

ELSYS

CODE OF ETHICS AND CONDUCT



OUR PURPOSE IS

**CONNECTING
PEOPLE TO
TRANSFORM
LIVES.**

ELSYS

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“INNOVATION IS A
MATTER OF SURVIVAL.”

DAMIAN ZISMAN



LETTER FROM THE BOARD

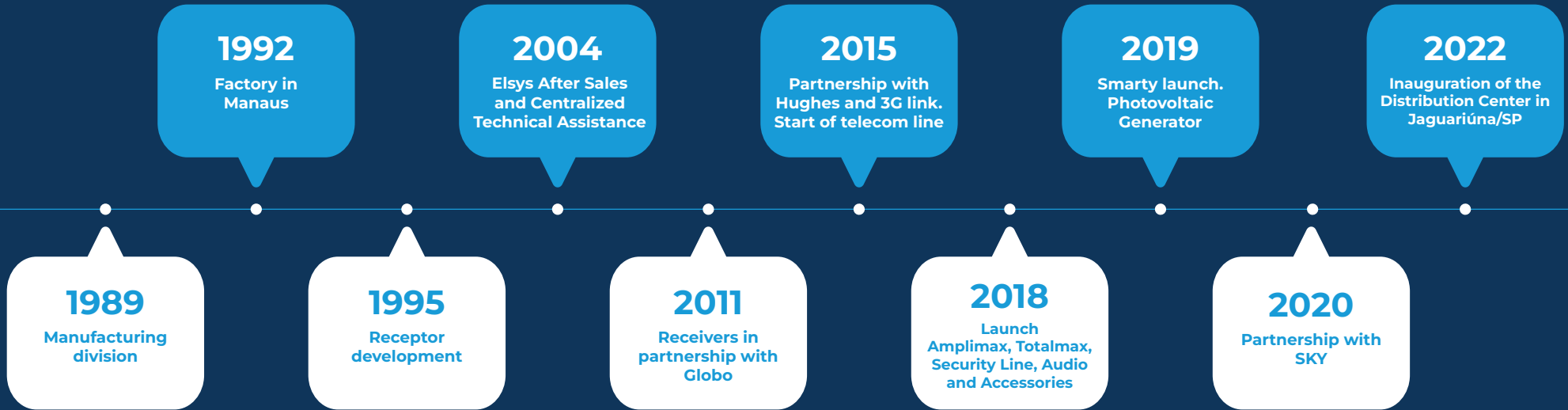
With more than 30 years in the market, ELSYS is always looking for innovative solutions to connect people and transform lives inside and outside the country. Specializing in TV, telephony and internet, accessories, security, smart home and solar energy, ELSYS develops products with exclusive functions, quality, ease of installation, simplicity of operation and high durability. It also offers specialized products and services through strategic partnerships in the satellite Internet segment and customized TV devices.

With a high capillarity in the national and international market, the company has sales channels in e-commerce, retail and a distribution network that has more than 30 thousand points of sale and 14 thousand accredited installation and technical assistance points. It also offers solutions to the B2B market, serving Brazilian companies and countries such as: Argentina, Colombia and Mexico. There are more than 900 employees divided between the headquarters in Valinhos (SP), the factory in Manaus (AM) with an area of 10,000 m2 and the branch in Shenzhen in China to facilitate and enable international business.

The Code of Ethics and Conduct demonstrates ELSYS'S concern for ethical and moral principles, human rights and social responsibility. In addition, it is the way we find to materialize the company's vision, mission, values and purpose.

Relationships are based on ethics, with a view to the sustainability of the activities that guide and conduct the business. Therefore, respect for people, integrity, equality, transparency and legality are stipulated as the basis for a relationship of trust and cooperation. That way, everyone must comply with the guidelines of this Code of Ethics and Conduct.

ELSYS: MORE THAN 35 YEARS OF HISTORY.



VISION

To build a respected and admired Business Group based on talent, dedication and enthusiasm.

MISSION

Exceeding customer expectations by creating innovative products and services, aiming for excellence in Quality, Cost and Service.

VALUES

Respect for people.
Delighting customers.
Integrity and corporate responsibility.
Innovation and continuous improvement.

WHO WE ARE:

What we do.
Who we do it for.
How we do it.

WHERE WE ARE GOING:

Where we want to go.
When we want to get there.

WHAT IS IMPORTANT TO US:

How we want to be recognized.
What we want to convey.

CUSTOMER RELATIONS

ELSYS customers are our greatest asset. The sustainability of our business depends on loyal and satisfied customers. With that in mind it's indispensable:

- 1**
Passing on truthful, clear and timely information, adequately indicating product prices, including in the media.
- 2**
Establish professional and impartial relationships, regardless of social conditions or any other individual characteristic.
- 3**
Maintaining cordiality and respect with our customers as a way of strengthening the relationship and the business.
- 4**
Respect the privacy and confidentiality of the information provided by clients.

The principles must permeate all the relationships established with the client, so it is not acceptable:

- 1**
Discriminate against or offend customers by expressing intolerance or prejudice, as this conduct is not only illegal, but also hurts the customer's dignity and damages ELSYS' image.
- 2**
Overlapping personal interests with those of clients or, on the contrary, favoring clients to the detriment of others.
- 3**
Circumventing legal provisions or internal regulations to benefit clients with whom personal relationships are maintained.
- 4**
Making any improper payment in order to facilitate the sale of products or services, even if it means depriving them of new business opportunities.
- 5**
Providing, trading or neglecting personal information of customers, visitors and others, putting individual privacy and reputation at risk.

RELATIONSHIP WITH SUPPLIERS

Suppliers play a very important role in the business value chain. That's why it's essential that relationships are based on transparency, respect, trust and a good business relationship.

Mutual and permanent competitive advantages are sought, based on contractual conditions, delivery times, compliance with technical specifications and the quality of the products and services contracted. ELSYS suppliers are therefore expected to comply with the best market practices and the legal requirements for their products and services. To achieve this it is essential:

- 1 Contracting suppliers in a transparent and objective manner, observing current legislation and internal rules.
- 2 To seek impartiality in negotiations and contract management, in order to guarantee the best cost-benefit ratio.
- 3 Providing equal opportunities and treatment to all, using only technical-commercial criteria, in specific cases also using creativity as a criterion in the accreditation and supplier selection process.
- 4 Check the registration and tax status of suppliers periodically, acting both preventively and detectively, thus preventing irregularities from being perpetuated.
- 5 Checking the products delivered by suppliers in their technical and physical aspects, paying particular attention to the expiry date.
- 6 Impose a contractual obligation and sign a Confidentiality Agreement in all cases where ELSYS and the supplier disclose or jeopardize confidential information or information related to the privacy of ELSYS customers and employees.
- 7 To preserve the confidentiality of the information shared and the commercial transactions carried out.

Free competition is encouraged and promoted, without interference in market demands and offers. Therefore, ELSYS suppliers or employees are not allowed to act to:

- 1 Inducing the parties or any of them to fail to comply with current legislation.
- 2 Receiving favors of any kind from the supplier with the aim of strengthening internal or external relations in order to influence decision-making or envisage differentiated treatment.
- 3 Representing or authorizing anyone to represent the company and/or use ELSYS brands, with the exception of anyone hired to do so.
- 4 Practicing any acts of corruption, actively or passively, to speed up public procedures or circumvent legal provisions.
- 5 Receiving or offering gifts or gratuities not mentioned under Gifts, Invitations, General Advantages, Events and Gifts, as specified on page 23 of this Code.

TRADE SANCTIONS

In compliance with international regulations, it is crucial to understand and adhere to applicable trade sanctions. Various countries and entities, including international organizations such as the United Nations, impose sanctions against certain countries, organizations and individuals. These sanctions can cover a variety of areas, from a total ban on transactions to specific restrictions on certain types of business, such as trade in goods or the provision of services.

It is essential that all employees who are involved in international business transactions are fully aware of the trade sanctions in force and strictly comply with all applicable guidelines. Before starting any business with an entity or individual subject to sanctions, it is essential to consult the company's Legal Department to ensure full compliance.

RELATIONS WITH PUBLIC BODIES

Relations with public bodies are guided by publicity and transparency, morality and legality.

One of our core values is social responsibility, and we believe in playing an important role in preventing and combating corruption in society, which is why each negotiation is carefully evaluated, avoiding any suspicion of favoritism or misuse of purpose.

The aim is to ensure that business and interpersonal relationships are built with integrity and contribute to the country's development. It is therefore indispensable:

- 1 Exercise professional and honest conduct in relations with public authorities.
- 2 Collaborate with inspections and other administrative acts, presenting all documents requested by public authorities.
- 3 Maintaining an impartial approach to politics and avoiding institutional statements on the decisions or actions of public officials.

For the same reasons, and since good corporate practices are encouraged and promoted, it is not allowed:

- 1 Privileging public officials by virtue of their position, even to benefit ELSYS.
- 2 Corrupting public officials or candidates for elected office to favor our business, expedite procedures, exempt from legal obligations through gifts, promises, privileges or personal advantages, since the legal effects of these occurrences are negative for our activities and for the Company.
- 3 Providing assistance to Public Bodies, except when requested by formal letter and when for the benefit of the local community or after authorization from the Board of Directors.

RELATIONS WITH COMPETITORS

Free enterprise and fair competition are encouraged and respected, so that the market evolves as a whole.

In addition, through sound commercial negotiations and competitive strategies, each member of the market will achieve results through their own work and effort.

For this reason, competitors are treated with professional respect, and ELSYS expects to receive the same treatment from them.

So, it's not allowed:

1

Making comments that discredit the image of competitors, unduly affect the reputation of your brand or that may contribute to the spread of rumors, by any means, including social media.

2

Discussing internal matters with competitors, except in the latter case in associations that defend the interests of the sector.

3

Sending or sharing internal or confidential information belonging to ELSYS or strategic information for the company by any means.

4

Obtaining information from competitors by shady methods or using information that is known to be secret or confidential.

RELATIONS WITH MEDIA

Communications media such as television, radio, the Internet and social media are key to guaranteeing ELSYS' image. In this way, a press service channel is maintained made up of duly trained and authorized professionals to preserve reputation and establish a transparent, objective and truthful relationship in the dissemination of information.

Aiming to continue this respectful relationship and based on ethics, is fundamental:

1

Guarantee the right to responsible and balanced freedom of expression, which does not exceed legal limits.

2

Establishing an effective and respectful service with press professionals.

3

Ensure that only employees authorized by the Marketing Department or Board of Directors issue opinions or statements on behalf of ELSYS.

**Therefore,
it is not
allowed:**

1

That unauthorized persons establish contact with press professionals to give interviews or provide clarifications on behalf of the company or that they use personal profiles on social media to transmit ELSYS information.

2

That professionals from any media record (audio or video) or photograph employees or our company premises without formal authorization from the Marketing and People & Management Department.

3

Providing information to the detriment of competitors or third parties, even if it may be of some benefit to the business.

It is hereby clarified that contact with the press is only made by the Chairman of the Board, CEO, Marketing Department or persons designated by them.

ENVIRONMENTAL RELATIONS AND SOCIAL ENGAGEMENT

As everyone knows, conserving our environment is fundamental for society. Therefore, in addition to compliance with environmental legislation, the sustainable production of suppliers and the conscious consumption of employees and customers are stipulated. It's indispensable:

1

Contributing to the conscious consumption of water and electricity, through internal campaigns and the use of available technology.

2

Encourage the correct disposal of waste, encouraging recycling, whenever possible.

3

Encourage a reduction in the use of plastic bags and other non-biodegradable packaging.

4

Dispose of electronic equipment in accordance with current legislation.

In addition, ELSYS has a strong social commitment, frequently participating in and sponsoring actions that contribute to (i) increasing social well-being; (ii) helping those who need it most; and (iii) promoting inclusion for different groups of people, regardless of their color, race or sexual orientation. ELSYS places great value on human beings, and its concern goes beyond its employees to include society as a whole.

In order to guarantee the reliability and integrity of the activities, it is not permitted to support or sponsor requests for donations of any kind to carry out events or campaigns without authorization from the Marketing and People & Management Department.

STANDARDS AND CONDUCT IN THE WORKPLACE

ELSYS' relationship with employees is based on current national legislation, internal regulations, respect for dignity, freedom of expression, social values and the individuality of each one, with the main objective of promoting a healthy and harmonious work environment , aiming to enhance professional well-being.

That's why, it's not acceptable for employees:

- 1** Act aggressively, offensively, ridiculously, humiliatingly, slanderously or embarrassingly in the workplace.
- 2** Carry out acts that denote or encourage any type of discrimination or prejudice, whether in person or digitally, for example, embarrassment as a result of color, race, sex, ethnic origin, language, age, economic condition, nationality, place of birth, physical condition, mental or psychic, kinship, religion, sexual orientation, union ideology or political positioning.
- 3** Have abusive conduct towards other employees, such as abuse, bullying, sexual harassment or moral harassment, regardless of whether in person or through digital means of communication.
- 4** Work under the influence of alcoholic beverages or illegal drugs, and are prohibited from carrying or consuming them on company premises.
- 5** Carry any type of weapon, whether firearms or bladed weapons, on company premises, regardless of whether they have the appropriate registration.
- 6** Carry out political, religious or commercial propaganda on company premises or with the use of resources.

The line manager is responsible for guiding and ensuring compliance with this Code of Ethics and Conduct, as well as all the day-to-day activities of employees.

However, employees must not execute orders from superiors or any other employee that are illegal or that cause damage to the integrity, image, reputation or assets of themselves, other employees and/or ELSYS. If any illegal order is received, the Elsys employee must report it to the Integrity Program, in accordance with the rules set out in the "COMPLAINTS AND QUESTIONS CHANNEL" section.

DIVERSITY AND INCLUSION

ELSYS values human rights as fundamental to the dignity and well-being of all people, committing to respect, protect and promote these rights in all operations and business relationships, regardless of race, ethnicity, religion, gender, orientation sexual, age, disability, or any other characteristic, also recognizing that diversity in each team strengthens the ability to innovate and meet the needs of all customers and third parties involved in the business.

ELSYS is committed to creating an inclusive work environment where everyone feels valued, respected and able to contribute fully. To achieve this goal, the following guidelines are adopted:



At ELSYS, diversity and inclusion are not just words, they are essential foundations of the organizational identity and culture. Everyone is committed to creating a working environment where all individuals can thrive and reach their full potential.

TRAININGS AND COMMUNICATION

ELSYS recognizes the critical importance of effective training and communication to promote a culture of ethics, integrity and compliance at all levels of the organization, committing to providing regular training and communication resources to ensure everyone involved in the business understands and complies their ethical and legal responsibilities.



The so-called "management by insult", that is, harsh and rude behavior directed at a group of people, without a specific target, is also strongly prohibited, and any practice of this conduct may result in the application of disciplinary measures after due analysis by the Committees of Investigation and Ethics.

It is also important to emphasize that leaders play a fundamental role in disseminating and applying the principles and values outlined in this Code of Conduct. In addition to fully understanding and adhering to the principles set out in this Code, leaders are expected to assume special responsibility for ensuring that their teams are fully informed about the content and purpose of this document, and must exemplify standards of ethical and professional conduct in all their interactions and decisions. They are encouraged to promote an inclusive work environment where all employees feel empowered to report any concerns related to compliance with this Code, without fear of retaliation or discrimination.

In this context, leaders are urged to offer continuous guidance and support to their team members, in order to ensure that everyone fully understands the ethical and behavioral expectations set. Through their exemplary and inspiring conduct, leaders play a crucial role in promoting an organizational culture based on integrity, transparency and mutual respect.

LEADERSHIP COMMITMENT



ELSYS values a fair, respectful, productive and inclusive working environment. In this scenario, leaders play an important role in managing employees.

It is unacceptable for an employee or a group of employees to be exposed to unethical conduct, which is why it is essential for leaders to conduct their activities in an empathetic and understanding manner, always focusing on the well-being of the group and results, through people.

REMOTE WORKING AND IN EXTERNAL ENVIRONMENTS

Depending on situations such as, for example, hybrid/remote work regime or visits to customers, it may be necessary for employees to carry out their activities remotely or in locations outside the ELSYS work environment, without forgetting to take precautions basic aspects regarding Integrity, confidentiality and availability, which are the fundamental pillars of Data Protection, privacy controls and other internal policies governed by this Code of Ethics and Conduct.

In that way, in remote working situations and in environments outside ELSYS premises, it is essential that the guidelines listed below are followed:

1

OBLIGATIONS UNDER THE CODE OF ETHICS AND CONDUCT AND CONTROLS OVER DATA PRIVACY AND INFORMATION SECURITY ARE MAINTAINED.

- The provisions of internal policies and the Code of Ethical Conduct continue to apply even outside the physical work environment.
- The values and principles that underpin ELSYS' operations remain fully applicable.
- Continue to protect customer data and the image and reputation of ELSYS.

BE CAREFUL WITH THE DATA!

- If you use a corporate computer or cell phone, or if you access ELSYS' information and data systems from any device, keep working safely, responsibly and focused on your work activities.
- Never give or lend your access credentials and/or the corporate equipment in your custody to third parties, even family members.

2

WHAT IS SECRET REMAINS SECRET!

- Do not disclose confidential ELSYS and/or Customer information to family or friends;
- Use data, records and restricted information with the utmost caution, whether in physical, oral or digital form;
- If you are handling confidential ELSYS documents or personal data of customers, employees and suppliers, you are responsible for the proper handling of this information.

Follow ELSYS' privacy and data protection guidelines and, if in doubt, consult the Information Technology Department and/or the Legal Department.

3

COMMUNICATION IS THE KEY!

- Are you unsure about what to do while working remotely?
- If this Code does not fully answer your questions, seek help from the Legal Department, People & Management or Information Technology.

CONFLICT OF INTERESTS

Conflict of interest is any situation that influences, or appears to reasonably influence, the loyalty, impartiality, and objectivity of an employee in relation to the company while acting on its behalf.



THE MOST COMMON SITUATIONS INVOLVING CONFLICTS OF INTEREST ARE:

- 1 Amorous and/or family relationships within the company, when there is a relationship between the functions performed, as well as with suppliers and service providers;
- 2 Other work activity that conflicts with working hours or working for the company;
- 3 Direct participation in the process of hiring service providers with whom they have a close relationship (friendship and/or kinship);
- 4 Personal relationship with any of the company's clients, when there is a relationship between the functions performed;
- 5 Personal relationship with an employee of a competitor company, when there is a relationship between the positions held;
- 6 Previous employment with a competitor.

CONFLICT OF INTERESTS

All internal and external relations are based on integrity, transparency, reciprocity and respect for ethical principles. Employees' professional decisions must be impartial and unbiased, always based on this Code of Ethics and Conduct and on defending the company's interests. That's why it's not accepted, for example:

1

The interference of private interests or third parties in decisions taken within the scope of ELSYS' business.

Private relationships can affect corporate decision-making when, for example, there is direct participation in the process of hiring service providers with whom you have a close relationship (friendship and/or family), or when there is a family and/or romantic relationship with another employee of the Company, as long as there is a relationship between the functions performed.



2

The exercise of other activities concomitant with the work activity that compromise the performance, credibility or responsibilities with ELSYS.

The performance of another work activity may impact the function performed at ELSYS when, for example, the working hours of the other job conflict with the working hours established in the employment contract with ELSYS.



3

Simultaneous employment with ELSYS and its competitors.

In this case, the conflict of interest exists since the employee will have access to confidential information from both companies. Such conduct may even constitute just cause for termination of employment, under the terms of Article 482, paragraph "c" of the Consolidation of Labor Laws (CLT). It is understood that, as a rule, it is not possible for employees to accumulate functions in competing companies.



CONFLICT OF INTERESTS



4

Participation in party political activities or any other activities, such as dinners, events or get-togethers, which could compromise ELSYS' impartiality.

ELSYS, as a business company, does not engage in political activities. Therefore, any employee who wishes to support, defend or sponsor candidates must not involve the name or image of ELSYS in actions of this nature.



5

The use of ELSYS resources and information for personal purposes or for the benefit of third parties.

ELSYS resources and information should only be used for the benefit of the company. Therefore, no employee will be able to use work tools, such as notebooks and corporate cell phones for exclusively personal activities, nor will they be able to share confidential company information with people who do not have express authorization to know them.



6

The use of confidential information previously acquired in previous jobs in competing companies.

ELSYS employees may use all the expertise developed in previous jobs, but may not, however, share information protected by confidentiality. This can even damage the company's image.

CONFLICT OF INTERESTS



It is important to note that it is not always easy to identify a Conflict of Interest.

Therefore, in case of doubt, it is very important that the specific case is brought to the attention of the ELSYS Investigation and Treatment Committee, so that it can be analyzed in detail and with all the necessary confidentiality.

Employees must inform their superiors and send an electronic mail to the email address **integrity@elsys.com.br**, describing and reporting situations that may characterize a Conflict of Interest, so that the specificities of the case can be analyzed with the consequent preparation of an action plan to mitigate any existing risks.

If a Conflict is not disclosed and, consequently, its possible risks are not mitigated, the company could suffer irreparable damage to its image. That's why, we're counting on everyone in this mission to connect people to transform lives in an ethical and correct way.

If there is no transparency on the part of the employee, ELSYS reserves the right to apply disciplinary measures due to the breach of trust between the parties.

PRIVACY AND INFORMATION SECURITY



Information and data that need to be kept in the custody of ELSYS must be considered and treated as confidential and critical to the company's business and interests, therefore, they must be protected and kept intact and available to ELSYS in accordance with the business needs that it determines. the level of secrecy and criticality of this data and information.

All personal and sensitive data from customers, employees, partners, suppliers and other people, which are collected and processed in ELSYS' business activities, must be considered, classified and treated as confidential and business-critical data at a level of importance equivalent to ELSYS strategic data.

Personal and sensitive personal data that are associated with a person's physical and personal characteristics or private life should only be collected and processed in ELSYS business if they are essential, and, after knowledge, registration and approval by a department manager.

All access and use of data and information held by ELSYS must only occur by those who have corporate needs and who justify their knowledge and treatment, and due to the professional activity carried out in the company.

All employees, partners and suppliers who access, process or become aware of this data and information in any way must be committed to the protection, safeguarding and confidentiality of these, as established in ELSYS corporate policies and standards, not and must use them for other purposes nor disclose them unduly, even after the end of the relationship with ELSYS.

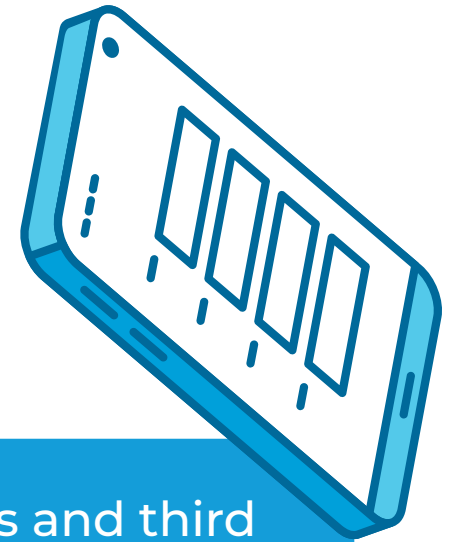
Any information and data received and/or made available from suppliers and partners cannot be used for personal purposes or purposes that are not related to the company's business activities.

Everyone who uses computers and corporate equipment must ensure and respect the copyright and/or intellectual property rights owned by ELSYS and third parties, including licenses, brands and other distinctive signs, such as the company name, domain name and other elements of visual identity, patents, industrial and business secrets, know-how and industrial designs.

PRIVACY AND INFORMATION SECURITY

ELSYS is the owner and holder of the copyright of all work and information generated as a result of the professional activities of employees, which have been developed with the use of company resources and/or which have been the subject of a contract that determines the ownership of ELSYS or whatever the law determines.

No information or personal data of employees, customers, partners and suppliers, including, but not limited to, registration data, images and photographs, should be published or posted on social networks or internet pages in the name of ELSYS without the knowledge and authorization of the data subjects and marketing and legal departments.



All employees, partners and third parties who need to process personal data on behalf of ELSYS must be aware of and respect the definitions in the Privacy Policy and the provisions of Law 13.709/2018.

Finally, demonstrating its commitment to privacy and information security, as well as complying with applicable legislation, ELSYS created the Information Security and Privacy Committee, which, through periodic meetings and in accordance with its Regulations, acts in a preventive and corrective manner in search of the implementation of best practices related to the topic. Whenever there are doubts regarding the processing procedure for personal data eventually involved in the activities, any of the members of this Committee must be consulted and, if necessary, the matter will be taken to deliberation.

CORRUPTION AND FRAUD

ELSYS complies with anti-corruption legislation in Brazil, especially regarding the Anti-Corruption Law, No. 12846/2013, and repudiates any and all forms of corruption, fraud, bribery, favoritism, extortion, rewards and kickbacks in relationships that we establish or during negotiation processes.

PREVENTING MONEY LAUNDERING AND TERRORIST FINANCING



ELSYS, recognizing its ethical and legal responsibility, is firmly committed to preventing money laundering and terrorist financing. We understand that such activities pose serious threats not only to the integrity of the financial system, but also to global security.

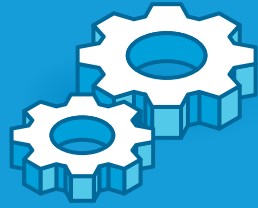
Therefore, any involvement in these illicit activities in the company is repudiated and strictly prohibited, and all ELSYS employees, partners and suppliers must be vigilant to avoid any connections with institutions or companies involved in this criminal practice.

SELECTING, HIRING AND PROMOTION OF EMPLOYEES

Equality, impartiality and transparency are guaranteed, without discrimination of any kind in employee selection, hiring and promotion processes.

Thus, equal opportunities are promoted for all employees, with a transparent hiring, promotion and dismissal process, which uses criteria of merit and competence and which allows employees to be aware of their performance throughout the period they maintain the contract. professional with ELSYS.

USE OF RESOURCES



Employees must make ethical, safe and legal use of the information, data, equipment and resources that ELSYS makes available, in an exclusively professional manner and in accordance with the company's interests, respecting internal policies and standards. It is therefore not permitted to use it to access content that is pornographic, obscene, immoral, illegal, offensive, discriminatory or that disrespects the privacy, freedom or intimacy of third parties.

Every employee must ensure the correct use, integrity and preservation of ELSYS resources, equipment, data and facilities, avoiding waste, destruction or unauthorized or illegal use.

GIFTS, INVITATIONS, ADVANTAGES IN GENERAL, EVENTS AND PRESENTS

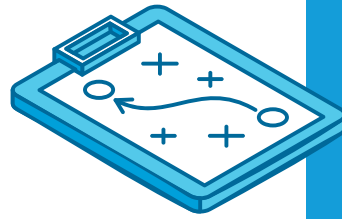
Employees are encouraged to take part in entertainment or ceremonial events related to or resulting from the business, as well as intellectual and professional development.

It is necessary to eliminate any situation that could interfere with decisions or cause discredit to the employee or the company due to the attitude presented towards receiving courtesies, gifts, gifts, bonuses, invitations, discounts on personal transactions, trips and benefits in general .

It is therefore, everyone's responsibility not to accept or offer, directly or indirectly, favors, money, gifts, invitations or presents of a personal nature that could affect decisions, facilitate business or benefit third parties. Employees are prohibited from suggesting or accepting shares, commissions or any other form of personal remuneration in connection with any transaction or business involving the company, except for market practices controlled and authorized by Management.

Only gifts, presents, invitations and advantages in general that do not exceed US\$ 50.00 (fifty dollars) can be accepted and, if the currency is the Brazilian real, the value cannot exceed R\$ 150.00 (one hundred and fifty reais). In any case, the advantage may not constitute non-compliance with the other rules of this Code of Ethics and Conduct. The employee must forward any gifts, presents, invitations or any other type of advantage received that is above the established limit to the Investigations and Handling Committee, which will define the destination together with the Ethics Committee. In this case, the Committee must approve and register the receipt of the goods, and an alternative method of approval is possible in case of urgency, by electronic mail.

LABOR LEGISLATION



ELSYS fully complies with all the precepts and guidelines of current labor legislation applicable to its employees, and the existence of forced labor and/or labor analogous to slavery and child labor is strictly prohibited. All partners who do business with ELSYS must also comply with current legislation, preventing practices that are harmful to the life, integrity and health of workers.

In addition, ELSYS ensures that all its employees exercise constitutionally guaranteed rights while at work, such as the right to come and go and the right to hold their convictions and speak out in accordance with them.

Finally, ELSYS is committed to promoting equal opportunities and fair treatment for all employees. We recognize that equal pay is a fundamental principle of justice and respect for human rights. As such, we are committed to complying with all laws and regulations related to equal pay, including those that prohibit pay discrimination based on gender, race, ethnicity, age, sexual orientation, disability, or any other protected characteristic.

COMPLIANCE AND VIOLATION OF THE CODE

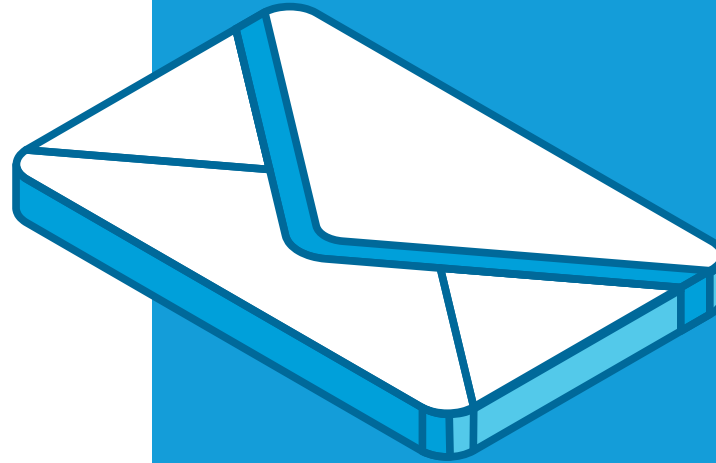
It is the obligation of all employees, suppliers, service providers and business partners to be aware of and comply with this Code of Ethics and Conduct in all professional relationships and activities involving ELSYS. Any attitudes contrary to what is established in this document or in the company's corporate policies and standards, including attempts to intentionally circumvent the definitions, are considered violations and are subject to analysis by the Investigation and Treatment Committee and the Ethics Committee, to determine and apply the applicable sanctions, such as verbal or written warning, suspension and even contractual termination, depending on the nature and severity of the conduct, without prejudice to the possible initiation of judicial or administrative proceedings.

Any action or event that intentionally or accidentally violates the controls, standards and policies that regulate the privacy, security, conduct and behavior of ELSYS employees, third parties and partners will be considered as non-compliance with the Code, and will be duly dealt with in order to avoid damage and losses to ELSYS and others involved. In this context, the facts will be investigated so that preventive and corrective actions can be established minimizing the possibility of future occurrences.

MEASURES DISCIPLINARY AND SANCTIONS

ELSYS takes all violations of the Code of Conduct seriously and is committed to applying fair and consistent disciplinary measures in response to such misconduct. Disciplinary measures, depending on the seriousness of the violation, may include, but are not limited to:

- 1 VERBAL OR WRITTEN WARNING;**
- 2 SUSPENSION;**
- 3 DISMISSAL, WITH OR WITHOUT CAUSE;**
- 4 TERMINATION OF CONTRACTS WITH SUPPLIERS, CLIENTS, BUSINESS PARTNERS AND SERVICE PROVIDERS.**



All disciplinary measures will be applied fairly and impartially, taking into account the seriousness of the infraction, the performance history of the employee and/or third party, and other relevant circumstances. ELSYS is committed to maintaining high standards of ethics and professional conduct in all areas of operation.

COMPLAINTS AND QUESTIONS CHANNEL

Incidents and cases of suspected violation of the provisions of this Code of Ethics and Conduct or other ELSYS policies and regulations must be immediately reported to one of the channels below:

- (i) to the immediate Manager, who must bring the matter to the attention of the company's Investigation and Treatment Committee**
- (ii) on the form available at the website <https://elsys.com/programa-integridade/>**
- (iii) for any of the members of the Investigation and Treatment Committee or the Ethics Committee**

In the case of using the "Canal Portas Abertas", item (ii) above, complaints will be registered, including, anonymously, if the complainant so wishes, and analyzed impartially, taking into account the confidentiality of the complainant's identity and the information provided.

When making a complaint, whether anonymous or identified, it is crucial to provide as many details as possible to ensure a thorough and immediate resolution of the problem. Furthermore, it is your responsibility to cooperate fully during any investigation.

Once the investigation of complaints and incidents has been completed, where appropriate, all the information gathered will be sent to the members of the Ethics Committee, who will be responsible for carrying out any disciplinary and remedial measures.



It is important to remember and emphasize that ELSYS prohibits any kind of retaliation against the whistle blower, even in cases of bad faith, ELSYS' conduct for correction will be based on the company's principles and values.

Any doubts or questions not covered by this Code of Ethics and Conduct can also be directed to <https://elsys.com/programa-integridade/>, or, if the whistle blower/informant prefers, they can direct their questions directly to their leaders, the People & Management Department or the Legal Department, who should, in turn, align the matter with the Investigation & Treatment Committee.

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