

CODE OF CONDUCT

GUARDIANS OF LIFE, a private legal entity enrolled with the Brazilian National Register of Legal Entities (CNPJ) under n. 03.596.009/0001-03, with registered office at Rua Elesbão Pinto da Luz, nº 85, sala 112, bairro Jardim Atlântico, Florianópolis/SC, ZIP Code 88.095-500, herein represented in accordance with its Articles of Association by its managing partner, Ms. Heloiza Beatriz da Rocha Arruda, hereinafter simply referred to as “**GUARDIANS OF LIFE**”.

Accordingly, this **CODE OF CONDUCT** (the “Code”) of **GUARDIANS OF LIFE** shall be governed by the following provisions and by all other applicable laws and regulations:

PREAMBLE - INTRODUCTION TO THE CODE OF ETHICS AND CONDUCT

As part of its commitment to corporate responsibility, **GUARDIANS OF LIFE**’s primary objective is to build trust with all of its employees, service providers, business partners, clients and the community. This commitment is first and foremost reflected in this Code of Conduct, which has been designed and structured around standards that embody our culture, mission, vision and values, with the aim of fostering a lasting culture of integrity, sustainability, honesty, transparency and ethical conduct. Furthermore, protecting the data of our employees, independent professionals and clients is of the utmost importance to us, which is why we rely on everyone’s cooperation in complying with these ethical standards.

GUARDIANS OF LIFE’s reputation and integrity are valuable assets and essential to its success. Accordingly, each employee is responsible for conducting their activities in accordance with the highest standards of ethics and integrity and for complying with all laws, rules, regulations, codes, guidelines and standards applicable to **GUARDIANS OF LIFE**’s business.

Everyone must uphold loyalty, honesty, transparency and mutual respect in their professional and personal dealings with clients, prospective clients, competitors, suppliers, regulatory and supervisory authorities, service providers and one another.

To the extent of the matters addressed herein, this Code shall prevail over any conflicting internal policies, manuals, notices, rules, practices, standards and/or guidelines. Everyone to whom this Code applies is responsible for knowing, understanding and complying with its provisions, with the objective of preserving the trust and credibility that **GUARDIANS OF LIFE** has established with its clients, business partners, employees and society at large.

To the extent applicable, this Code forms an integral part of the legal relationships maintained by **GUARDIANS OF LIFE** with its employees, officers, suppliers, service providers, business partners and other third parties acting on behalf of or for the benefit of the Company, without prejudice to the obligations set forth in specific agreements.

Accordingly, employees are prohibited from failing to comply with the provisions of this Code. Each employee is responsible for their own conduct and actions. It is therefore essential that everyone become familiar with and apply the information and values contained in this Code in their daily activities. Whenever any question arises regarding this document or the appropriate course of action in a particular situation, employees must immediately seek guidance from their direct supervisor and/or the department responsible for the relevant matter.

We therefore expect you to incorporate these standards of conduct into your daily routine and to contribute to fostering a strong organizational culture within the Company. The fundamental principle is that, in every situation, we have a duty, as employees and business partners of the Company, to act with integrity. Moreover, no code can ever replace individual conscience and sound judgment.

We trust in your commitment to the Company's guidelines and in your ability to put these principles into practice in your daily activities. Together, we will work to uphold our shared values and objectives.

I - MISSION, VISION AND VALUES

1.1. An organization's mission, vision and values are fundamental to guiding the actions and conduct of its employees and other individuals involved with the Company, as well as to establishing a strong and cohesive organizational culture. At **GUARDIANS OF LIFE**, we have developed a mission, vision and set of values that reflect our commitment to society:

- I. **Mission**: **GUARDIANS OF LIFE's** mission is to create inspiring art exhibitions and products that raise awareness and generate resources for environmental and social causes.
- II. **Vision**: Our vision is to bring art, information and knowledge about important causes to 500 million people by 2030.
- III. **Values**: Our actions are guided by trust, ethics, loyalty, transparency, integrity, commitment, social and environmental responsibility, and boldness.
- IV. **Purpose**: We seek to make the world a better place for all living beings through art.

II - THE CODE OF ETHICS AND CONDUCT

2.1. The Code of Ethics and Conduct comprises a set of fundamental ethical principles and rules of conduct that guide behavior and promote fair and harmonious relationships among our team and the stakeholders with whom we interact. Its provisions establish the practices and standards of conduct to be followed in everyday activities, always with the purpose of supporting **GUARDIANS OF LIFE's** corporate mission.

2.2. The purpose of this Code of Ethics and Conduct is to serve as a reference for attitudes and behaviors both within the Company and outside the workplace whenever such conduct may have an impact on the Company.

2.3. Based on our belief that the success of our business depends on the combination of results and a strong set of values, we are firmly committed to conducting our activities in compliance with the law and ethical principles.

II.1 - MAIN OBJECTIVES OF THE CODE OF ETHICS AND CONDUCT

2.1. The main objectives of this Code are to:

- I. Assist in resolving ethical dilemmas that may arise in connection with the day-to-day interpretation of the Company's policies;
- II. Establish appropriate boundaries for the activities and conduct of **GUARDIANS OF LIFE** and its employees;

- III. Guide and direct the judgment and conduct of the team and its members toward ethical behavior;
- IV. Establish conduct and behaviors that are unacceptable within **GUARDIANS OF LIFE**;
- V. Comply with all laws, regulations and policies governing our business;
- VI. Act honestly, fairly and reliably in all of our activities and relationships;
- VII. Treat one another fairly and foster a workplace based on respect for individuals and their unique characteristics, while maintaining a safe environment and acting responsibly toward the environment and the local community;
- VIII. Protect the Company's assets and information, as well as assets and information entrusted to us by third parties;
- IX. Avoid conflicts of interest, as well as situations that may create the appearance of a conflict between professional and personal interests;
- X. Compete responsibly in the marketplace;
- XI. Reinforce a culture of meritocracy;
- XII. Ask questions, seek guidance and raise concerns regarding any matter related to conduct;
- XIII. Through leadership at all levels, create and sustain a culture in which ethical conduct is recognized, valued and practiced by all employees.

II.II - FUNDAMENTAL ETHICAL PRINCIPLES

2.2. The fundamental ethical principles form the basis of this Code and shall guide the conduct of all **GUARDIANS OF LIFE** employees. They are:

- I. Dignity, respect, trust, lawfulness, and individual and collective integrity, as inalienable moral values of every individual, the team and the institution, without discrimination of any kind;
- II. The pursuit of positive outcomes for oneself and for others, with the common good as a higher aspiration;
- III. The creation of opportunities, appreciation of work, continuous pursuit of knowledge and enhancement of the workplace as an environment for experiences that promote human development in all its dimensions - biological, psychological, social and spiritual;
- IV. Encouragement of creativity, individual initiative, and individual and collective growth as part of the Company's mission;
- V. The development of awareness, sensitivity and consciousness toward collaboration, generosity and solidarity as integral aspects of human development;
- VI. In the event of disputes or disagreements, the parties shall seek to resolve such matters fairly and efficiently through dialogue and negotiation, ensuring that all parties involved are heard and that solutions are reached peacefully and in accordance with **GUARDIANS OF LIFE's** values;
- VII. **GUARDIANS OF LIFE** conducts its activities in accordance with ethics, integrity, transparency, respect for individuals, social and environmental responsibility, compliance with applicable laws, and the prevention of practices that may compromise its reputation, business activities or the trust of its employees, clients, business partners, suppliers and other stakeholders.

2.2.1. The principles established in this Code apply to all employees, officers, shareholders, service providers, suppliers, business partners and other third parties acting on behalf of or for the benefit of **GUARDIANS OF LIFE**, to the extent applicable to them.

II.III - GUARDIANS OF LIFE'S ETHICAL PRINCIPLES IN RELATION TO ITS CLIENTS

2.3. The following ethical principles shall govern **GUARDIANS OF LIFE's** relationships with its clients:

- I. Continuously strive for excellence in the provision of services through effective business management;
- II. Provide courteous and equal treatment, always offering clear and accurate information and complying with established quality standards;
- III. Preserve the confidentiality and proper organization of information and documents;
- IV. Uphold transparency and honesty in the provision of services;
- V. Avoid situations that create conflicts of interest or even the appearance of such conflicts;
- VI. Honor contracts and commitments of any nature;
- VII. Properly address any suggestions, compliments, complaints and criticism;
- VIII. Refuse compensation, gifts and personal benefits, except where expressly permitted under this Code and the policies relating to such matters.

II.IV - GUARDIANS OF LIFE'S ETHICAL PRINCIPLES IN RELATION TO ITS EMPLOYEES

2.4. The following ethical principles shall govern **GUARDIANS OF LIFE's** relationship with its employees:

- I. Encourage the professional and personal development of each employee;
- II. Ensure the confidentiality of each employee's personal and employment-related information;
- III. Promote transparency, integrity, honesty, dialogue, loyalty, cooperation and mutual respect;
- IV. Ensure treatment free from prejudice and discrimination of any kind, including on the basis of race, gender, sexual orientation, religion, regional origin, disability, social class, age or appearance, with due respect for plurality and diversity;
- V. Promote workplace safety, recognizing each employee's right to refuse to perform any activity involving risks beyond those inherent to their duties and for which the employee has not been properly trained and equipped;
- VI. Promote individual responsibility for the protection of personal data.

II.V - GUARDIANS OF LIFE'S ETHICAL PRINCIPLES IN RELATION TO SUPPLIERS AND SERVICE PROVIDERS

2.5. The following ethical principles shall govern **GUARDIANS OF LIFE's** relationship with its suppliers and service providers:

- I. Act impartially and fairly in the execution, extension, revocation or termination of agreements;
- II. Encourage improvements in safety conditions and professional qualifications;
- III. Provide the information, facilities or resources necessary for contracted services to be performed to the required quality standards;
- IV. Maintain the confidentiality of prices and other information related to contracted services;
- V. Monitor and evaluate the services provided based on well-founded criteria;

- VI. Neither accept nor offer compensation, gifts or other benefits in consideration for contracted services;
- VII. Support initiatives that promote development and well-being for all.

II.VI - GUARDIANS OF LIFE'S ETHICAL PRINCIPLES IN RELATION TO SOCIETY

2.6. The following ethical principles shall govern **GUARDIANS OF LIFE's** relationship with society at large:

- I. Respect cultural, political, regional and religious diversity;
- II. Support quality education and the development of children and society in all forms of progress;
- III. Support initiatives that promote development and well-being for all;
- IV. Maintain the knowledge and awareness necessary to identify and report any suspected cases involving human trafficking, forced labor or conditions analogous to slavery, exploitation, migration-related abuses, child labor and organ trafficking.

II.VII - GUARDIANS OF LIFE'S ETHICAL PRINCIPLES REGARDING THE CORPORATE ECOSYSTEM

2.7. Corporate social responsibility encompasses economic, social, ethical and environmental concerns and, accordingly, provides a means of achieving the broader objective of sustainable development. In conducting its activities, **GUARDIANS OF LIFE** is committed to complying with all applicable environmental laws, standards, codes and regulations. **GUARDIANS OF LIFE** prioritizes pollution prevention and the establishment of objectives based on environmentally appropriate alternatives, while also promoting awareness among its employees regarding social and corporate initiatives and environmental protection.

2.7.1. With regard to social responsibility, **GUARDIANS OF LIFE** recognizes that responsibility for one's actions stems from the ability to make choices. Accordingly, **GUARDIANS OF LIFE** prioritizes the incorporation into its activities of matters relating to human rights, the Sustainable Development Goals, the fight against corruption in all its forms, and other programs and initiatives adopted as guidelines for establishing its policies.

2.7.2. With regard to sustainable development, **GUARDIANS OF LIFE** incorporates into its activities and products management principles intended to have a positive impact on the development of society. Its mission, vision, values and corporate policies are based on guiding principles aimed at achieving economic efficiency, social fairness and inclusion, and environmental responsibility. Through its internal programs, **GUARDIANS OF LIFE** seeks to engage its clients, employees and suppliers in implementing concrete and consistent sustainable development measures, also encompassed by the concept of ESG (Environmental, Social and Governance).

2.7.3. Accordingly, this document also complements and strengthens **GUARDIANS OF LIFE's** governance framework in accordance with its corporate and technological obligations. In connection with this Code, **GUARDIANS OF LIFE** establishes procedures designed to prevent, detect and remediate risks relating to compliance with laws and regulations from an ethics and integrity perspective. The Company seeks to comply with all aspects of the corporate ecosystem, whether internal or external.

III - RULES OF CONDUCT FOR GUARDIANS OF LIFE EMPLOYEES

III.I - GENERAL GUIDELINES

3.1. **GUARDIANS OF LIFE** defines rules of conduct as standards of behavior that may be used to determine what is right or wrong. Accordingly, we expect our employees to:

- I. Perform their responsibilities lawfully and ethically;
- II. Always act competently and honestly;
- III. Remain mindful of the implications their actions may have for the entire team;
- IV. Fulfill their commitments to a high standard of quality;
- V. Interact with all stakeholders with respect, civility, solidarity, responsibility, transparency, honesty and tolerance;
- VI. Respect professional confidentiality, documents, rules and regulations, and the safety and security of all persons involved;
- VII. Maintain courteous and respectful relationships with everyone;
- VIII. Cooperate and work as a team;
- IX. Safeguard both personal and corporate reputation;
- X. Promote environmental sustainability by ensuring that natural resources are used consciously and efficiently.

III.II - CONDUCT DEEMED UNACCEPTABLE BY GUARDIANS OF LIFE

3.2. The following conduct is deemed unacceptable within **GUARDIANS OF LIFE's** workplace and professional relationships:

- I. Discriminating against any person on the basis of race, creed, gender, age, sexual orientation, regional origin, appearance, nationality, marital status or physical disability;
- II. Sexually harassing any person;
- III. Giving preferential treatment to any person based on personal interests or feelings;
- IV. Failing to safeguard workplace safety by disregarding applicable legal requirements and best practices for accident prevention;
- V. Disclosing **GUARDIANS OF LIFE's** proprietary information to third parties without proper authorization from the appropriate level of management;
- VI. Knowingly condoning, whether by action or omission, conduct by employees or third parties that compromises the safety, integrity or proper performance of services provided by **GUARDIANS OF LIFE**;
- VII. Misusing technology and information resources made available by the Company, including by violating information security policies or otherwise causing harm to **GUARDIANS OF LIFE**;
- VIII. Using the Company's property, equipment or facilities for personal purposes or for activities unrelated to work, except where expressly authorized by the Company;
- IX. Forging or falsifying documents, misappropriating funds, or engaging in any other form of financial fraud, all of which shall be deemed serious misconduct and may result in legal action.

IV - CONFLICTS OF INTEREST

4.1. A conflict of interest arises when personal interests conflict with those of the Company. A conflict of interest includes any situation involving a benefit, whether material or otherwise, for oneself or for third parties (including first-degree relatives, personal relationships, friends, etc.).

4.2. To ensure that the conduct of employees and business partners remains consistent with **GUARDIANS OF LIFE's** principles, the following rules must be observed:

- I. Maintain only such professional or commercial relationships with suppliers, service providers, competitors or clients as are strictly necessary for the performance of one's duties;
- II. It is expressly prohibited to engage in any transaction or business involving **GUARDIANS OF LIFE** for the purpose of obtaining a personal benefit;
- III. It is prohibited to obtain personal advantages, privileges or favors, whether internally or externally, arising from one's role or position at **GUARDIANS OF LIFE**;
- IV. Any situation that may constitute a conflict of interest must be formally disclosed to the relevant managers or individuals responsible for the applicable engagement or hiring decision;
- V. Disclose in advance any personal, family, corporate, professional or other relationship that may influence, or appear to influence, the impartiality of decisions relating to **GUARDIANS OF LIFE**, including relationships involving a public official, a Politically Exposed Person, client, supplier, service provider or business partner.

IV.I - BENEFITS, GIFTS AND HOSPITALITY

4.3 Our decisions are guided by the best interests of our business, as well as by compliance with applicable legal, labor and environmental requirements. Accordingly, the following rules must be observed:

- I. Do not offer, directly or indirectly, advantages, privileges, gifts and/or favors that may influence any type of decision;
- II. Gifts of significant value or gifts other than customary promotional items, such as pens, keychains, calendars and similar items, must not be accepted;
- III. **GUARDIANS OF LIFE** strictly prohibits and rejects the acceptance of any cash payment, gratuity or cash equivalent;
- IV. It is expressly prohibited to receive from clients or suppliers any gifts, money or other rewards that could be construed as a bribe;
- V. It is prohibited to request or receive any gift, favor, invitation or advantage, whether for oneself or for another person, from any individual or legal entity;
- VI. Offering or accepting gifts, meals, travel, accommodation, tickets, entertainment, hospitality or any other benefits is prohibited whenever their purpose, nature, value or surrounding circumstances may influence, or appear to influence, a professional or administrative decision, particularly where a public official or Politically Exposed Person is involved.

4.3.1. In the event of any doubt as to whether a benefit may be accepted, the employee must consult the Ethics Committee. If any of the circumstances described above occurs, it is essential that the relevant service provider or employee immediately report the matter to their supervisor. Failure to do so may subject such person to the sanctions provided for under the Brazilian Consolidation of Labor Laws (Consolidação das Leis do Trabalho – “CLT”).

V - CONFIDENTIALITY AND DISCLOSURE OF GUARDIANS OF LIFE INFORMATION

5.1. All information relating to the Company's operations and business that is not classified as public is confidential and, accordingly, any external disclosure thereof, when required or necessary, must be

formally authorized. Even information shared internally, particularly sensitive information, must be handled with the utmost care.

5.2. The Company's confidential information includes, but is not limited to, information relating to business plans, client data, financial data and information, systems, infrastructure, personnel and organizational matters. In short, all information that is not publicly available shall be treated as confidential.

5.3. **GUARDIANS OF LIFE** employees must exercise particular care and comply with the following requirements:

- I. When creating or handling documents or materials containing **GUARDIANS OF LIFE** data, appropriately classify them to reflect their status as proprietary and/or confidential Company information;
- II. When receiving materials marked as proprietary and/or confidential Company information, retain such markings on all copies and on any new materials incorporating such information;
- III. Whenever confidential information needs to be shared with third parties, ensure that a Confidentiality Agreement or Non-Disclosure Agreement ("NDA") is entered into, subject to prior authorization by the Company's management;
- IV. Information that may relate to material facts or events must be shared internally only with those persons who need to know such information in order to perform their duties;
- V. Employees who have access to confidential or privileged business information may not use such information for personal, financial or any other type of gain;
- VI. Confidential information may not be used for personal purposes or for the benefit of third parties without the prior formal authorization of the person responsible for such information;
- VII. Our confidential information may not be shared on social media without the express consent of the Marketing and Internal Communications department (see also the section on Social Media and Other Forms of Sharing);
- VIII. Information concerning current or former employees may only be shared internally with persons who require such information in order to perform their duties. Sharing such information with third parties requires the consent of the Human Resources department, which shall assess each case individually;
- IX. The obligations set forth herein shall survive the termination of an employee's relationship with the Company. Upon termination of the employment or professional relationship, the former employee must return all documents, records, papers and equipment containing any **GUARDIANS OF LIFE** proprietary information and must not retain copies of any Company information;
- X. Our information and management systems are among our most valuable assets and must therefore be protected with all of the precautions described herein.

5.4. Without prejudice to the provisions above, when disclosing information relating to or owned by **GUARDIANS OF LIFE**, no **GUARDIANS OF LIFE** employee or service provider may:

- I. Omit or distort any facts or information that they are required to disclose;
- II. Provide false information under any circumstances;
- III. Omit information concerning any unlawful act committed by a client, supplier or employee;
- IV. Act in an unethical, inappropriate or unlawful manner under any circumstances;

- V. Obtain personal advantages or benefits;
- VI. Disclose any information relating to suppliers, employees or clients, or any other strategic or confidential information belonging to **GUARDIANS OF LIFE**;
- VII. Disclose confidential, internal or material information to third parties or professionals who are not authorized to receive such information, whether during the term of the employment agreement or after its termination, for as long as such information remains confidential;
- VIII. Fail to exercise due care to ensure that confidential information is not improperly disclosed;
- IX. Share user accounts for access to **GUARDIANS OF LIFE**'s systems and e-mail accounts, which are personal and non-transferable. Access credentials may not be shared with any other person, and passwords must be kept confidential and known only to the individuals responsible for the respective accounts;
- X. Fail to comply with this Code, other applicable policies and guidelines, or internal training requirements relating to these matters.

VI - ANTI-CORRUPTION RULES

6.1. **GUARDIANS OF LIFE** values honesty, transparency and respect in all of its relationships, particularly in its dealings with Public Authorities. Accordingly, under no circumstances does **GUARDIANS OF LIFE** permit or encourage the obtaining of any undue advantage from public authorities or private parties. The Brazilian Anti-Corruption Law (Law No. 12,846/2013) must be complied with by all persons subject to this Code, and sanctions shall apply in the event of any violation.

6.2. Accordingly, **GUARDIANS OF LIFE** does not permit any employee to engage in bribery, corruption of any kind, improper payments or the receipt of kickbacks involving any person whatsoever as a means of obtaining or retaining business, benefits or any other form of improper advantage.

6.2.1. For purposes of this Code, an undue advantage means any payment, offer, promise, authorization, benefit, gift, favor, contribution, donation or any other form of advantage, directly or indirectly offered or granted to a public official or any third party for the purpose of obtaining, retaining or directing business, decisions, authorizations, contracts, benefits or any other improper advantage.

6.2.2. The prohibition established in this Code applies both to conduct carried out directly by **GUARDIANS OF LIFE**'s employees and officers and to conduct carried out by third parties, intermediaries, representatives, consultants, business partners, suppliers or any other persons acting on behalf of or for the benefit of **GUARDIANS OF LIFE**.

6.2.3. It is prohibited to make, authorize or facilitate payments of any kind intended to expedite, secure or facilitate acts, procedures, services or decisions by public officials, even where such payments are of nominal value or are described as fees, gratuities or routine expenses, except solely for official payments duly required under applicable law.

6.3. The Company fully complies with Brazilian Law No. 12,846/2013 and strongly condemns any act of corruption carried out by employees, officers, third parties, consultants, business partners or similar persons on behalf of the Company in dealings with Public Authorities. Appropriate legal and disciplinary measures shall be taken in the event of any violation. Accordingly:

- I. No payment may be made to Public Authorities for the purpose of obtaining any type of undue advantage;
- II. Meals, travel or entertainment may not be offered to public officials for the purpose of improperly influencing or rewarding any official act or decision, whether as actual or intended consideration for any benefit to **GUARDIANS OF LIFE**;
- III. Under no circumstances may any gift or promotional item be given in exchange for improper favorable treatment by a public official for the purpose of obtaining any benefit for **GUARDIANS OF LIFE**;
- IV. Contributions or donations may not be made to charitable organizations in exchange for favors from any public official, even where the beneficiary is a legitimate charitable organization;
- V. All Company agreements, particularly those entered into with government entities or Public Authorities, must be reviewed and approved by the Legal Department prior to execution;
- VI. All employees are responsible for reporting any suspicious conduct or action that is contrary to this Code or applicable law. **GUARDIANS OF LIFE** may also monitor and review agreements, business partners and transactions for compliance purposes.

6.4. In connection with operations, business activities, agreements or relationships involving foreign jurisdictions, **GUARDIANS OF LIFE** shall comply, in addition to applicable Brazilian law, with any foreign anti-corruption laws applicable to its activities, including, where applicable, the United States Foreign Corrupt Practices Act ("FCPA") and the United Kingdom Bribery Act 2010, and is committed to maintaining integrity standards consistent with all applicable legal requirements.

VI.I - POLITICAL, PARTISAN AND RELIGIOUS ACTIVITIES

6.5. **GUARDIANS OF LIFE** maintains an institutionally non-partisan position and does not use its resources, property, facilities, communication channels, brand, name, image or other assets for political, partisan or religious purposes.

6.5.1. **GUARDIANS OF LIFE's** name, brand, image, financial resources, communication channels, facilities, equipment or any other assets may not be used to promote, support, finance, publicize or otherwise favor political parties, candidates, election campaigns, political or partisan movements, or religious organizations.

6.5.2. Any political, partisan or religious beliefs or opinions individually expressed by employees are personal in nature and do not represent **GUARDIANS OF LIFE's** institutional position and may not be presented as an expression, endorsement or position of the Company.

6.5.3. No employee, officer, service provider, supplier or business partner may use their position, role or relationship with **GUARDIANS OF LIFE** to induce third parties to join, support or contribute to any particular political or partisan organization or religious organization.

6.5.4. Employees may participate individually in political, partisan or religious activities, provided that such participation is undertaken strictly in a personal capacity and outside the performance of their professional duties, complies with applicable law, and does not involve **GUARDIANS OF LIFE's** resources, assets, working time or institutional representation.

VI.II - POLITICALLY EXPOSED PERSONS – PEPs

6.6. **GUARDIANS OF LIFE** adopts risk-based preventive and due diligence measures in connection with business or professional relationships involving Politically Exposed Persons (“PEPs”), their family members, close associates, or legal entities in which such persons hold an ownership interest, exercise control or otherwise exert significant influence.

6.6.1. For purposes of this Code, a Politically Exposed Person means an individual who holds or has held a prominent public position or public function in Brazil or abroad, as defined by applicable laws and regulations.

6.6.2. **GUARDIANS OF LIFE** may request from its employees, clients, suppliers, service providers, business partners and other third parties such information and declarations as may be necessary to identify any PEP status, including the existence of any relevant family, corporate or professional relationship with a person classified as a PEP.

6.6.3. The identification of a person as a PEP shall not, in and of itself, prevent **GUARDIANS OF LIFE** from entering into or maintaining a relationship with such person. Any such relationship shall be assessed in light of the risks involved, the nature of the transaction, the source of funds, the purpose of the relationship and any other relevant circumstances of the particular case.

6.6.4. Where heightened risks are identified, **GUARDIANS OF LIFE** may adopt enhanced due diligence measures, including requesting additional information, obtaining prior management approval, verifying the source of funds and conducting enhanced monitoring of the relationship.

6.6.5. PEP status shall be taken into consideration for the period prescribed by applicable laws and regulations, including after the individual ceases to hold the relevant public position or function.

VII - PERSONAL DATA PROTECTION GUIDELINES

7.1. The Personal Data Protection Guidelines set forth the main ethical principles and standards that shall govern **GUARDIANS OF LIFE**’s internal, business and governmental relationships. These Guidelines apply to employees, suppliers, service providers and business partners who have access to personal data collected and processed by the Company.

7.2. This section is intended to establish and harmonize internal procedures for the processing of personal data. It also seeks to raise awareness among employees, suppliers, service providers and business partners regarding the proper processing of personal data, with a view to ensuring compliance with Brazilian Law No. 13,709/2018 (the Brazilian General Data Protection Law – “LGPD”) and respect for personal information.

7.3. Compliance with this Code of Ethics and Conduct does not exempt those who have internal access to or process personal data from the obligation to understand and comply with applicable data protection laws.

VII.I - COMMITMENT AND ACCOUNTABILITY

7.4. Among **GUARDIANS OF LIFE**’s core values, the pursuit of excellence through ethics and transparency is a fundamental pillar of the Company’s privacy and data protection framework. Accordingly, senior management, the Privacy Committee, the Data Protection Officer, as well as employees, suppliers,

service providers, business partners and other stakeholders, are committed to this Code and to compliance with applicable laws, ensuring its proper implementation and effectiveness.

7.4.1. **GUARDIANS OF LIFE** does not tolerate any violation of applicable laws and investigates all matters involving suspected violations of privacy or the protection of personal data collected and processed by the Company.

7.4.2. All persons subject to this Code must safeguard, protect and maintain in strict confidence all third-party personal data to which they have access in the performance of their duties, particularly information constituting personal data.

VII.II - PROCESSING OF PERSONAL DATA

7.5. The collection and processing of personal data must be carried out in accordance with the LGPD, without being limited thereto, and in strict observance of the rights, freedoms and guarantees established by the Federal Constitution of Brazil. Such processing must be carried out lawfully, transparently and without deception.

7.5.1. All data processing activities and practices adopted by the Company must at all times be based on transparency and the ethical principles established in this Code of Ethics and Conduct, whether in internal relationships or in dealings with clients, private institutions, public authorities or competent governmental authorities, including any foreign or domestic governmental entity at any level, state-owned or state-controlled entities (such as state-owned oil companies), sovereign wealth funds, political parties or candidates.

VII.III - RESPECT FOR PERSONAL DATA SUBJECTS

7.6. All work performed and developed by **GUARDIANS OF LIFE** is founded upon and inspired by client satisfaction and the protection of privacy and personal data. We continuously seek to enhance our privacy and personal data protection practices, recognizing that everyone within **GUARDIANS OF LIFE** plays an essential role in ensuring the ethical, transparent and lawful use of personal information.

7.6.1. To this end, all relationships with personal data subjects must observe the following:

- I. All rights provided for under the LGPD;
- II. Transparency in all interactions, ensuring that any information of interest to the client that is not subject to confidentiality is provided clearly and as a matter of priority;
- III. Maintain and support rules and procedures designed to safeguard the confidentiality, privacy and protection of personal data;
- IV. Comply with rules protecting the rights of personal data subjects, particularly by acting with honesty, ethics and transparency;
- V. Safeguard the security of personal data subjects in all respects;
- VI. Refrain from any discriminatory or prejudicial conduct in connection with information relating to personal data subjects.

7.6.2. In the event of any doubt concerning any of the situations described above, the employee's direct supervisor or the Privacy Committee must be consulted.

VII.IV - ENGAGEMENT OF THIRD PARTIES INVOLVED IN PERSONAL DATA PROCESSING

7.7 **GUARDIANS OF LIFE** values honesty, ethics and transparency in all processes involving the use and processing of personal data within the Company. Accordingly, **GUARDIANS OF LIFE** maintains internal rules and procedures governing the selection, assessment and monitoring of third parties involved in personal data protection.

7.7.1. We expect our third parties to adhere to the same standards of integrity, information security, transparency, ethics and personal data protection upheld by **GUARDIANS OF LIFE**.

7.7.2. **GUARDIANS OF LIFE** does not engage third parties that refuse to comply with applicable personal data protection laws, the provisions of this Code or equivalent principles.

VII.V - CONFIDENTIALITY AND NON-DISCLOSURE

7.8. **GUARDIANS OF LIFE** processes personal data and may also process sensitive information. All employees, suppliers, service providers, business partners and other stakeholders must maintain appropriate confidentiality with respect to Company data and protect such data comprehensively, proactively and effectively.

7.8.1. Personal data processed by **GUARDIANS OF LIFE** shall be used exclusively for legitimate and specific purposes compatible with the activities performed, in accordance with the principles, legal bases for processing, data subject rights and other requirements established under applicable law, particularly Brazilian Law No. 13,709/2018 ("LGPD").

7.8.2. Access to and use of information made available by the Company shall be restricted to those involved in its business activities and only to the extent required for the performance of their respective duties. Disclosure to third parties is prohibited unless expressly authorized in writing.

7.8.3. Any and all internal information is protected as proprietary business information and may under no circumstances be externally disclosed, shared or reported without the Company's express consent.

7.8.4. Employees, suppliers, service providers, business partners and other stakeholders must refrain from discussing Company matters or internal or client personal data in public places and must maintain strict confidentiality regarding confidential or privileged information to which they have access in the performance of their professional activities. In the event of any doubt regarding the confidentiality of information or whether it may be disclosed, the Legal Department and/or the Data Protection Officer ("DPO") must be consulted.

VII.VI - RESPONSIBILITIES

7.9. Employees, suppliers, service providers, business partners and other stakeholders involved in the personal data lifecycle may be subject to disciplinary liability for any violation or unlawful transmission of personal data to which they have access and are responsible for complying with the guidelines established in this Code.

7.9.1. Clients, external suppliers, subcontractors and other stakeholders shall be liable in accordance with applicable contractual provisions and legal requirements.

VII.VII - INFORMATION SECURITY

7.10. Information security is essential to **GUARDIANS OF LIFE**'s sustainability, trust and credibility. **GUARDIANS OF LIFE** processes its own data as well as data belonging to clients, suppliers, service providers, business partners and other stakeholders.

7.10.1. **GUARDIANS OF LIFE** undertakes to use all reasonable efforts to ensure security and safeguard the integrity of information contained in its systems and equipment and adopts policies and procedures necessary to protect against cyberattacks, unauthorized access and data breaches. The disclosure of data relating to employees, suppliers, service providers, business partners or other persons involved with personal data without proper authorization is prohibited, whether through in-person sharing, written communication or storage or transmission in any other electronic format.

7.10.2. Corporate e-mail accounts and any technological equipment owned by the Company and used on the corporate network or on behalf of the organization may be monitored. Individuals involved in the Company's internal activities who have access to personal data should have no expectation of privacy when using such corporate systems and resources.

7.10.3. Making copies or printing files used, generated or made available by the Company, whether in hard copy or digital format, is strictly prohibited, as such files contain information that constitutes the Company's proprietary information. In cases where a professional has custody or possession of a file in printed or digital form, such professional shall be directly responsible for its proper preservation, integrity and confidentiality.

7.10.4. Technology provided by **GUARDIANS OF LIFE**, including computers, mobile devices, software and internet access, must be used responsibly and for professional purposes. The use of technology must at all times comply with internal cybersecurity and privacy policies and must not involve any activity that could compromise the Company's security or violate copyrights or applicable laws.

7.10.5. **GUARDIANS OF LIFE** owns and protects its intellectual property assets, including patents, trademarks, copyrights and trade secrets. All employees must respect and protect such assets, as well as the intellectual property rights of third parties. Any misuse or unauthorized use of the Company's intellectual property may result in legal and disciplinary action.

7.10.6. In addition, professionals must refrain from using removable storage devices (such as USB flash drives, external hard drives, memory cards or similar devices), as well as any other media or data-transfer technologies, unless expressly authorized and intended exclusively for the performance of professional activities within the Company.

7.10.7. **GUARDIANS OF LIFE** periodically conducts assessments and tests designed to identify potential technical and procedural vulnerabilities that may pose risks to personal information. Accordingly, connecting any equipment to the Company's internal or external network without prior authorization from the person responsible for information technology is prohibited.

VII.VIII - PERSONAL DATA PROTECTION AND PRIVACY MANAGEMENT SYSTEM – SGPD

7.11. The SGPD shall be implemented as follows:

- I. **Procedures**: Specific procedures and guidelines shall be established for the performance of operations and services, organized in accordance with the objectives of the LGPD and this Code.
- II. **Training**: Training shall be conducted in accordance with specific procedures and an established schedule, including the following:
 - a. Basic privacy training shall be provided to the team whenever new employees are hired, new positions or functions are created, or internal changes in positions or functions occur;
 - b. Ongoing privacy and data protection training shall be conducted periodically, at least once every six (6) months;
 - c. Additional privacy training shall be provided whenever new needs arise or processes are changed.

VIII - PERSONAL RESPONSIBILITY OF EMPLOYEES

8.1. All employees are personally responsible for complying with this Code of Ethics and Conduct and for understanding and observing the guidelines established herein. This includes applying ethical principles, complying with internal policies and observing applicable laws and regulations.

8.2. Employees must act with integrity and diligence, ensuring that their actions reflect the Company's values and standards. In particular, employees and service providers must:

- I. Perform their duties honestly, carefully, diligently, professionally, impartially and with integrity;
- II. Strive to uphold the highest ethical standards in order to maintain the trust and credibility of clients and other persons involved, rather than merely meeting the minimum requirements necessary for legal or procedural compliance;
- III. Take the time necessary to read and understand this Code and the consequences of any failure to comply with its provisions;
- IV. Refrain from holding financial interests that conflict with the conscientious performance of their duties

IX - NON-SOLICITATION, NON-POACHING AND NON-DISPARAGEMENT

9.1. Consistent with the anti-corruption provisions set forth herein, employees may not engage in acts that compete with or may directly or indirectly harm **GUARDIANS OF LIFE's** interests, particularly in the following circumstances:

- I. **(Non-Solicitation)** Employees may not solicit, induce or invite, under any pretext, **GUARDIANS OF LIFE's** clients, suppliers or business partners (including their respective representatives, whether individuals or legal entities) — understood herein as **GUARDIANS OF LIFE's** external relationships — for commercial purposes in any manner that may reduce **GUARDIANS OF LIFE's** client portfolio or compete with the activities carried out by **GUARDIANS OF LIFE**;

- II. **(Non-Poaching)** Upon termination of their relationship with **GUARDIANS OF LIFE**, employees are prohibited from entering into any professional relationship and/or engagement with **GUARDIANS OF LIFE's** shareholders, employees or service providers (even if such persons subsequently cease to be **GUARDIANS OF LIFE's** clients, representatives or partners) — understood herein as **GUARDIANS OF LIFE's** internal relationships — for commercial, employment or any other business purpose that may in any way reduce **GUARDIANS OF LIFE's** team or compete with or otherwise harm the activities carried out by **GUARDIANS OF LIFE**;
- III. **(Non-Disparagement)** Employees undertake not to make public statements or otherwise publicly express themselves against **GUARDIANS OF LIFE** or its representatives, particularly through comments that may harm **GUARDIANS OF LIFE's** public image. For purposes of this provision, comments and posts published on the internet (including, without limitation, Facebook, Twitter, WhatsApp, blogs or personal profiles of any kind) shall be deemed public statements, in accordance with the duties of good faith applicable during and after the contractual relationship;
- IV. The restrictions set forth above shall apply throughout the contractual relationship and for a continuous period of sixty (60) months following termination of the contractual relationship or the date on which the relevant employee ceases to be associated with **GUARDIANS OF LIFE**;
- V. Employees hereby acknowledge that they are aware of all persons referred to above and may not claim lack of knowledge thereof, including with respect to persons who are no longer associated with **GUARDIANS OF LIFE**;
- VI. A violation shall also be deemed to have occurred if a new organization with which a former employee or departing shareholder becomes associated fails to comply with the obligations set forth above, and such person shall be required to exercise due diligence to prevent such violation;
- VII. Any violation of the provisions above shall constitute grounds for termination for cause by **GUARDIANS OF LIFE** and shall further subject the employee to a non-compensatory penalty equal to ten (10) times the highest remuneration received by such employee during the preceding twelve (12) months, for each violation, without prejudice to any losses and damages caused, to be determined out of court.

X - PUNCTUALITY

10.1. **GUARDIANS OF LIFE** values punctuality and respect for the time of others. Punctuality is an attribute of utmost importance to the Company and to maintaining its credibility with clients, as well as a fundamental requirement for the provision of excellent services.

10.2. Employees must arrive in advance for scheduled meetings, whether held at the office or elsewhere, so that meetings may begin promptly at the scheduled time. Heavy traffic shall not be considered a justification for tardiness, except in the event of accidents or other unforeseen circumstances beyond the employee's reasonable control.

10.3. To improve performance and avoid overlooking relevant matters, employees should always arrive ten (10) minutes before the scheduled time. Over time, this habit will provide benefits and enhance professional credibility.

10.4. In the event of unforeseen circumstances, the person responsible for or leading the meeting must be privately notified sufficiently in advance so that no person is left waiting without explanation. This demonstrates respect for others.

10.5. Repeated tardiness may be regarded as a lack of interest or preparedness on the part of an employee and may result in a warning and, in the event of repeated occurrences, may constitute grounds for termination for cause.

XI - PENALTIES

11.1. All employees, officers, suppliers, service providers, business partners and other stakeholders have a duty to report, in good faith, any suspected or actual violation of this Code, applicable law or GUARDIANS OF LIFE's internal policies.

11.1.1. Reports may be submitted through compliance@guardiansoflife.org, and the reporting person may choose to remain anonymous where technically feasible.

11.1.2. **GUARDIANS OF LIFE** shall treat all information received as confidential and shall take reasonable measures to protect the identity of the reporting person, the persons involved and the information relating to the report.

11.1.3. Any form of retaliation, threat, intimidation, discrimination or adverse treatment against any person who, in good faith, submits a report, communicates a suspicion or participates in an investigation concerning a potential violation of this Code is expressly prohibited.

11.1.4. The reporting channel must be used responsibly and in good faith. Deliberately false or fraudulent reports, or reports made for the purpose of harming third parties, are prohibited.

11.2. Whenever a violation of this Code is reported or identified, **GUARDIANS OF LIFE** may conduct an internal investigation, either directly or through duly appointed internal or external professionals, in accordance with standards of impartiality, confidentiality, proportionality and respect for the rights of the persons involved.

11.2.1. Whenever applicable and consistent with the nature of the investigation, the persons involved shall be given an opportunity to provide explanations and relevant information necessary for a proper understanding of the facts.

11.2.2. Information and documents obtained during an investigation shall be treated as confidential, subject to the limitations imposed by applicable law and to the requirements of the investigation, defense rights and compliance with legal obligations.

11.3. Measures resulting from a violation of this Code shall be applied in proportion to the seriousness of the conduct, the extent of any harm caused, the degree of responsibility of the person involved, whether the conduct was intentional or negligent, any recurrence, and any other relevant circumstances of the particular case.

I. With respect to employees:

a. **Verbal or Written Warning:** For minor violations or as an initial corrective measure;

- b. **Disciplinary Suspension:** Where applicable and in accordance with applicable labor laws;
- c. **Termination for Cause:** Serious violations, such as fraud, corruption, harassment, unlawful conduct or repeated minor violations, may result in immediate termination for cause;
- d. **Civil and/or Criminal Liability:** In cases involving unlawful activities, the employee may be subject to civil and criminal liability, including judicial proceedings.

II. **With respect to the other persons subject to this Code:**

- a. **Warning or Formal Notice:** To formally communicate the occurrence of a violation and provide guidance regarding the necessary adjustment in conduct;
- b. **Request for Corrective Measures:** To require the adoption of measures necessary to correct the conduct and prevent recurrence;
- c. **Contractual Penalties:** Contractual penalties may be imposed in accordance with the applicable contractual provisions;
- d. **Termination of the Contractual Relationship:** Serious violations, such as fraud, corruption, harassment, unlawful conduct or repeated minor violations, may result in immediate termination for cause;
- e. **Civil and/or Criminal Liability:** In cases involving unlawful activities, the responsible party may be subject to civil and criminal liability, including judicial proceedings.

XII - DISPOSIÇÕES GERAIS

12.1. Requests for clarification and questions regarding the interpretation or application of this Code shall be directed to the managing partner at admin@guardiansoflife.org, with a copy to compliance@guardiansoflife.org. The DPO shall promote the dissemination of this Code, provide training regarding its provisions, and ensure awareness, acknowledgment, adherence and validation thereof.

12.1.1. **GUARDIANS OF LIFE** shall, in accordance with its needs and risks, conduct communication, training, awareness and guidance initiatives relating to this Code, ensuring that all persons subject to it have access to its contents and understand its principal provisions.

12.2. This Code does not exhaust all potential ethical issues relating to the Company's business activities and does not preclude the adoption of appropriate measures in response to any conduct that violates generally accepted standards of good judgment, ethics and morality.

12.3. All employees, officers and other persons subject to this Code shall acknowledge their awareness of and commitment to complying with its provisions by physically or electronically signing the applicable Acknowledgment and Acceptance Form.

12.3.1. Suppliers, service providers, business partners and other third parties acting on behalf of or for the benefit of **GUARDIANS OF LIFE** may be required to formally adhere to this Code depending on the nature, significance and risk of the relevant contractual relationship.

12.4. Any questions concerning the matters addressed herein or matters not expressly provided for in this document may be submitted to **GUARDIANS OF LIFE's** managing partner or addressed by exercising sound judgment as to the appropriate course of action. In doing so, each person should ask themselves the following questions:

- I. What is best for **GUARDIANS OF LIFE**?
- II. Is what I am considering doing the right thing?
- III. Is my proposed course of action fair and honest?
- IV. Could this action be questioned at a later date?
- V. What impact will this conduct have on the Company?
- VI. How will I feel afterwards?
- VII. How would this look on the front page of a newspaper?
- VIII. What would I advise my children to do in the same situation?
- IX. How would I feel if my family, friends and neighbors knew about it?

12.5. This Code of Ethics and Conduct shall become effective upon its publication and shall remain in force for as long as **GUARDIANS OF LIFE** continues its business activities. Where expressly provided herein, certain provisions shall continue to apply following termination of an employee's relationship with **GUARDIANS OF LIFE**.

12.6. This Code may be reviewed and updated every two (2) years, or at shorter intervals where necessary to reflect legal, regulatory, self-regulatory or structural changes affecting the Company, with the aim of continuously enhancing security and effectiveness.

Last updated: September 22, 2026.