

Code of Conduct and Ethics

Dynamox

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Message from the CEO

Dear all,

I present to you the Dynamox Code of Conduct and Ethics — a document that expresses our values and reinforces our unwavering commitment to integrity, transparency, and respect in all our relationships.

We believe that innovation and excellence are only sustainable when anchored in ethics and responsibility. Every action reflects who we are as an organization. This Code is therefore more than a set of guidelines — it is a guide that inspires our behavior and strengthens mutual trust in a collaborative environment.

We incorporate these principles into our daily routines, fostering a safe, inclusive, and sustainable workplace where there is no room for omission.

Dynamox is made up of people who believe in the power of transformation and the strength of the values that unite us. I count on everyone's commitment to continue walking a path guided by ethics, respect, and innovation.

Thank you for being part of this journey.

Guillaume Barrault

Introduction

This Code of Conduct and Ethics reflects our belief that integrity builds trust. Here, we bring together guidelines that guide decisions, inspire actions, and strengthen Dynamox's culture.

By applying these principles in our daily work, we cultivate an environment of trust where everyone collaborates with safety, respect, and innovation. More than a rulebook, this Code inspires us to act according to the values that shape our success and strengthen our relationships.



Mission

Make your industry safer and more productive than yesterday!

Vision

To be a global benchmark in efficient and effective solutions for asset monitoring, maintenance, and performance.

Values

Our values are:

- Adaptability
- Boldness
- Collaboration
- Excellence
- Innovation



Adaptability

Our ability to adapt allows us to thrive in constantly changing environments. We quickly adjust to new scenarios and transformations, strengthening our operational efficiency and fostering a culture of innovation and continuous learning.

Boldness

We are a bold company. We face challenges with courage and determination, explore the unknown, and stay focused on ambitious goals that drive our growth.

Collaboration

We foster a collaborative environment, valuing the exchange of ideas, diversity of thought, and synergy among teams. This encourages innovation and creative problem-solving, strengthens our competitive position, and adds value to the company.

Excellence

We pursue the highest standards of quality, innovation, and performance. Continuous improvement is part of our mindset, guiding us to exceed expectations and deliver exceptional results every day.

Innovation

Innovation is the fuel that drives our growth. We encourage creativity and develop pioneering solutions that generate value for our clients and partners, positioning Dynamox as a unique and differentiated brand.

Commitment to Ethical Conduct

At Dynamox, ethics is not just a stated commitment — it is the foundation of our organizational culture. We believe that acting with ethics, transparency, and responsibility strengthens trust in our relationships and drives sustainable growth.

Our commitment goes beyond compliance with rules and regulations: we strive to incorporate these principles into every decision and interaction, ensuring a fair, safe, and respectful work environment. Each employee plays a key role in this effort, being responsible for promoting and preserving conduct that is honest and aligned with our values. This means acting with integrity, respecting differences, avoiding conflicts of interest, and safeguarding the collective good — ensuring that our actions reflect what we truly believe.



Compliance with Applicable Laws and Regulations

We operate in full compliance with applicable laws and regulations, ensuring ethical and responsible operations. During inspections and audits, designated employees must cooperate fully with the relevant authorities. Any improper or illegal advantage or privilege is strictly prohibited.

a) International Trade
We fully comply with foreign trade regulations, including import, export, licensing, and sanctions, ensuring compliance in all transfers of products, technologies, services, and information.

b) Data Privacy
In accordance with the Brazilian General Data Protection Law – LGPD (Law No. 13.709/18) and other data protection regulations, we adopt technical and organizational measures that restrict access to personal data (of clients, employees, suppliers, and partners) exclusively to authorized individuals and for legitimate purposes. Data collection is limited to what is necessary, and data subjects may exercise their rights via the portal available on the Dynamox website or by email at dpo@dynamox.net.

c) Fraud, Bribery, Anti-Corruption, and Anti-Money Laundering
We maintain a strict policy against corruption, money laundering, fraud, and bribery, in compliance with Brazilian and international regulations. Any acts aimed at obtaining undue advantages are prohibited.

Any fraudulent, corrupt, or bribery-related conduct is strictly prohibited by Dynamox. It is forbidden to offer, pay, or authorize any bribe to public or private agents, as well as to conceal the origin of illicit funds. Violations are subject to disciplinary and legal sanctions.

Expected Conduct

- Act with integrity and transparency in all professional and business relationships.
- Refuse offers, promises, or requests for advantages, regardless of value.
- Immediately report any suspicion of fraud, corruption, or money laundering to the Ethics and Conduct Committee.
- Know and follow the company's anti-corruption policy and applicable legal regulations.

Prohibited Conduct

- Offering, promising, or authorizing any benefit (financial or otherwise) to influence third-party decisions.
- Making unrecorded payments or disguising transactions with questionable origins.
- Using third parties (intermediaries, consultants, agents) to conceal illicit practices.
- Accepting gifts, promotional items, or hospitality that compromise decision-making impartiality.

d) Relationship with Competitors

We are committed to complying with antitrust and competition laws. Any formal or informal agreement on pricing, production, distribution, commercial terms, or exchange of sensitive information (costs, margins, investments, etc.) with competitors is strictly prohibited.

Respect for Health, Safety, and Well-being

We believe a safe and healthy environment goes beyond accident prevention — it also involves respect for dignity, diversity, and the physical and mental balance of each individual. Our responsibility is to create conditions that allow everyone to work peacefully, protected from physical, emotional, and social risks.



a) Physical and Operational Safety

We maintain a safe work environment by preventing accidents through training, proper equipment, and strict compliance with safety standards. No activity should be performed without ensuring the safety of everyone involved.

Expected Conduct

- Perform all activities in strict accordance with safety standards and procedures.
- Properly use the personal protective equipment (PPE) provided by the company.
- Participate in safety training and apply the knowledge in daily routines.
- Immediately report any risk situation or potential accident.

Prohibited Conduct

- Performing tasks without using protective equipment.
- Ignoring company-established safety procedures or guidelines.
- Carrying out activities in unsafe conditions or without proper authorization.
- With holding information about risks or incidents related to physical and operational safety.
- Mishandling equipment or machinery irresponsibly.

b) Occupational Health

We invest in health promotion, encouraging habits that reduce occupational risks and ensuring proper working conditions. We continuously monitor ergonomic, biological, and environmental factors that may affect employee health.

Expected Conduct

- Participate in periodic and occupational medical exams as scheduled.

- Properly use ergonomic resources available at the workstation.
- Immediately report any physical discomfort or condition that may affect health in the workplace.

Prohibited Conduct

- Concealing symptoms or health conditions during occupational medical evaluations.
- Mishandling furniture, equipment, or tools in disregard of ergonomic guidelines.
- Unjustifiably refusing to use mandatory personal protective equipment (PPE).

c) Psychosocial Risk Prevention

We recognize that factors such as excessive stress, work overload, moral harassment, or lack of work-life balance affect mental health and performance. Therefore, we promote an environment of respect and open dialogue to prevent negative impacts on mental health.

Expected Conduct

- Maintain respectful and collaborative communication with colleagues, leaders, and other departments.
- Respect individual boundaries and encourage work-life balance.
- Report harassment, overload, or hostile environments through appropriate company channels.

Prohibited Conduct

- Engaging in or tolerating moral harassment, intimidation, or humiliation.
- Encouraging excessive work hours or pressuring colleagues abusively.
- Ignoring clear signs of mental distress in oneself or others without seeking support or guidance.

d) Diversity, Equity, and Inclusion

We respect and value differences, ensuring that all individuals are treated with dignity and have fair opportunities. We believe that a truly inclusive environment fosters innovation, collaboration, and sustainable growth.

We do not tolerate any form of discrimination or unequal treatment based on race, color, ethnicity, nationality, age, religion, gender, gender identity, sexual orientation, physical, mental, or psychological condition, political opinions or beliefs, or any other individual factor.

Our recruitment, selection, and promotion processes are based solely on competencies, qualifications, and alignment with the company's culture. We do not accept decisions influenced by bias, favoritism, or any form of privilege.

Expected Conduct

- Treat all individuals with respect, regardless of their personal characteristics or beliefs.
- Promote an inclusive environment that values diverse perspectives and experiences.
- Base hiring, promotion, and recognition decisions on technical and behavioral criteria, free from bias.

Prohibited Conduct

- Engage in or tolerate any form of discrimination, prejudice, or exclusion.
- Make jokes, comments, or insinuations that disrespect identities, backgrounds, or beliefs.
- Favor or disadvantage individuals in selection processes or internal opportunities based on non-competency-related factors.

e) Prevention of Harassment and Abusive Behavior

Any form of harassment — whether moral, sexual, or other abusive conduct — as well as discrimination or intimidation, is unacceptable at Dynamox. To ensure a safe, respectful, and dignified work environment, we provide a confidential and reliable whistleblower channel. All reports are investigated rigorously, impartially, and promptly, and appropriate measures are applied without exception.

Expected Conduct

- Treat all individuals with respect, maintaining professional relationships based on ethics and care.
- Report any witnessed or experienced harassment or abusive behavior through appropriate channels.
- Cooperate with investigations by providing truthful and respectful information.

Prohibited Conduct

- Engage in or tolerate any form of harassment, whether moral or sexual.
- Make comments, gestures, or insinuations that may embarrass or intimidate colleagues.
- Retaliate against or discriminate against individuals who report misconduct in good faith.

f) Safe and substance-free workplace

It is prohibited to carry weapons or use illicit substances on Dynamox premises and/or during working hours. Alcohol consumption is only permitted during authorized corporate events, and must be moderate and responsible, ensuring the safety and integrity of all employees.



g) Human rights and decent working conditions

We reject any form of exploitation, forced labor, or child labor. We require all our partners and suppliers to adopt practices aligned with the highest standards of ethics and dignity in the workplace. We are committed to respecting labor rights, including ensuring a safe and healthy environment, fair wages, and full compliance with applicable legislation.

Our operations are guided by an unwavering commitment to human rights, ensuring that our value chain is composed of companies that share and rigorously apply these principles.

Environmental Responsibility

Environmental responsibility is present in every stage of our operations. All employees must be aligned with Dynamox's Health, Safety, and Environmental Policy, promoting proper waste disposal and sustainable practices in daily routines. In addition to complying with legal requirements, we encourage a culture of environmental awareness, where daily choices reflect our respect for the environment and our commitment to a more sustainable future.

Expected Conduct

- Adopt sustainable practices in daily routines, such as resource conservation and proper waste disposal.
- Comply with the guidelines of Dynamox's Health, Safety, and Environmental Policy.
- Report improper environmental practices or identified environmental risks in the workplace.

Prohibited Conduct

- Waste natural resources or company materials intentionally or negligently.
- Dispose of waste improperly or in violation of environmental regulations.
- Ignore procedures and guidelines related to environmental preservation.

Transparency and Corporate Governance

Transparency is one of Dynamox's core pillars, reflecting our commitment to ethics, integrity, and corporate responsibility. We ensure that all relevant information is communicated clearly and accessibly to those who need to be informed, fostering a culture of trust among employees, partners, and clients.

a) Open Dialogue

Dynamox encourages its employees to communicate clearly, transparently, and professionally, always guided by integrity and honesty. This approach strengthens trust within the organization, promotes efficient information exchange, and contributes to more

agile, productive, and effective processes.

Expected Conduct

- Maintain transparent, professional, and respectful communication with all stakeholders.
- Actively contribute to creating an environment of greater trust and collaboration.
- Express doubts, suggestions, and concerns constructively.

Prohibited Conduct

- Spread rumors, gossip, or unfounded information.
- Remain silent in the face of conduct that violates company principles.
- Adopt aggressive or passive-aggressive behavior in communication channels.



b) Responsible use of corporate resources

Electronic communication tools provided by Dynamox are intended exclusively for professional use. To ensure information protection, the company may monitor device usage and internet access, always in accordance with applicable legislation and best security practices.

Installing unauthorized software and misusing corporate resources for personal or non-compliant activities is strictly prohibited.

Expected Conduct

- Use company resources and systems exclusively for professional purposes.
- Comply with internal information security and technology usage policies.
- Take care of the equipment and tools provided by the company.
- Store work-related documents in official environments, such as SharePoint.

Prohibited Conduct

- Install unauthorized software or make changes to corporate systems.
- Use company devices excessively or inappropriately for personal purposes.
- Share passwords, data, or access credentials carelessly.
- Store files only on the desktop or personal accounts, to avoid data loss and rework.

c) Access and Confidentiality of Information

Dynamox ensures that all corporate information is shared clearly, objectively, and accessibly, while respecting confidentiality and security principles. Access to internal documents and data must follow defined protocols, ensuring that only authorized individuals can consult them.

Expected Conduct

- Maintain confidentiality of internal information, even after leaving the company.
- Access documents and data only when authorized and for

legitimate professional purposes.

- Protect sensitive and strategic data from unauthorized access.

Prohibited Conduct

- Share confidential information with unauthorized individuals.
- Print, copy, or send corporate data unnecessarily or without authorization.
- Access restricted systems or documents without proper permission.

d) Financial Transparency

The company's accounting records are prepared consistently and in compliance with current legislation, accurately reflecting the organization's operations. These records are available for internal and external audits and for competent authorities.

e) Risk Management and Internal Controls

We maintain a formal structure for risk prevention and management, with clearly defined roles and responsibilities. Periodic monitoring provides a comprehensive and transparent view of the main risks faced by the organization and the effectiveness of our critical controls, ensuring the security, compliance, and integrity of our operations.

f) Donations and Sponsorships

Dynamox seeks to promote positive social transformation through donations and sponsorships, always with full transparency. Sponsorship initiatives are guided by company directives and subject to management review. In line with principles of transparency and integrity, no donation or sponsorship may be made on behalf of Dynamox if it violates applicable legislation.

g) Gifts, Promotional Items, and Institutional Invitations

Gifts, promotional items, and institutional invitations are permitted provided they meet strict criteria of transparency and integrity. They must be evaluated based on nature, purpose, value, and frequency, respecting the limit of up to 10% of the current national minimum wage and applicable legislation.

Externally Received Items

- Up to R$ 50.00: may be accepted directly by the employee, with no need for reporting.
- Above R$ 50.00 and up to 10% of the minimum wage: must be forwarded to the People & Culture department (Florianópolis) or local management (other units) for registration and allocation via internal raffle.

Internally Received Items

- Any value (up to 10% of the minimum wage): must be forwarded to the People & Culture department (Florianópolis) or local management (other units) for registration and allocation via internal raffle.

In case of doubt or exceptional situations, formal review by the Compliance Manager is mandatory.



h) Intellectual Property

All intellectual property rights — including trademarks, patents, industrial designs, domain names, copyrights, innovations, inventions, processes, projects, prototypes, ideas, and any financial, commercial, or market information — created directly or indirectly by employees or third parties linked to Dynamox belong exclusively to the company. Dynamox may freely use, license, or exploit these rights in Brazil and abroad, ensuring full transparency in their registration and management, in accordance with applicable legislation.

i) Partnerships with Third Parties and Suppliers

Dynamox adopts a rigorous process for supplier selection and approval, based on technical, ethical, and professional criteria, and always conducted with full transparency. Selection considers the best cost-benefit ratio and alignment with our compliance practices and legal standards. All negotiations must be conducted openly and based on mutual trust. Additionally, we rely on the Supplier Code of Conduct and Relationship, which establishes standards of professionalism, impartiality, and mutual respect in our partnerships.

j) Conflict of Interest

Dynamox values ethics, integrity, and transparency in both internal and external relationships. Therefore, all employees are expected to act impartially and avoid situations that may compromise — or appear to compromise — their objectivity in performing their duties. A conflict of interest is any situation in which personal, family, emotional, financial, or professional interests may influence, or appear to influence, the employee's ability to act in the best interest of the company.

The mere existence of a personal connection does not, in itself, constitute a violation. What must be avoided is direct involvement in processes that involve such connections without prior disclosure and evaluation by the company.

Connections that must be disclosed when related to company decisions:

- Family: blood or affinity relatives up to the third degree (e.g., spouse, parents, children, siblings, in-laws).
- Financial or Economic: direct or indirect participation in companies (as partner, shareholder, or executive), business relationships

with interested third parties (such as suppliers, clients, or partners), or any financial dependency between the employee and a person involved in company decisions.

- Professional: current or recent (within the last 12 months) work or service relationships with companies that are suppliers, clients, partners, or competitors of Dynamox. Includes formal ties (employment, consulting, service provision) and informal ones (recurring collaboration, technical advisory, etc.).
- Emotional or Personal: romantic relationships, close friendships, or emotional ties with individuals involved in company decision-making processes, as well as public enmity, personal conflicts, or known rivalries that may compromise impartiality.

Examples of conflict of interest situations

- An employee participates in the selection process of a supplier company in which a family member is a partner.
- An employee is responsible for supplier selection and recommends a company in which they are a minority shareholder, without informing the company.
- A manager is romantically involved with a team member and directly participates in their performance evaluation.
- A manager is conducting the recruitment of a candidate who is leaving a competitor of Dynamox. In such cases, prior approval is required, as the recent connection with the competitor may pose risks. Best practice is to prioritize hiring after the candidate has worked elsewhere between leaving the competitor and joining Dynamox.
- An employee recommends a close friend for a job opening and participates in the selection process without disclosing the personal connection.
- A newly hired employee is assigned to a project with a client for whom they provided consulting services within the last six months and with whom they still maintain informal ties.
- A manager accesses strategic company data and uses it to help a friend start a competing business.
- A manager chooses to hire a supplier with whom they have a history of working in other companies, based on trust and service quality, but resists considering new quotes or equally qualified suppliers with better commercial terms — limiting competition and compromising fairness in

in the selection process.

- An employee has a known personal rivalry with a supplier and excludes them from a selection process, despite their superior technical and commercial proposal.

Duty to disclose and evaluate

The employee must report any situation that may constitute a conflict of interest to the Compliance team within five (5) business days of identifying the situation, so that proper evaluation can be conducted. Compliance will analyze the case and issue a response within ten (10) business days of receiving the report.

In case of doubt, the employee must consult Compliance before participating in decisions, meetings, or processes related to the potential conflict.

Expected Conduct

- Fully and promptly disclose any connections that may represent a conflict of interest.
- Refrain from participating in situations where a potential conflict exists until receiving company guidance.
- Keep the Self-Declaration Form updated whenever relevant changes occur.
- Cooperate with any internal reviews or investigations.

Prohibited Conduct

- Fail to disclose or delay reporting of connections that may constitute a conflict of interest.
- Participate in decisions, approvals, or evaluations involving individuals or companies with whom the employee has a connection, without prior company authorization.
- Use one's position or internal information to benefit personal interests or those of connected third parties.
- Interfere with or influence corporate decisions for personal gain or the benefit of third parties, even if not directly involved in the process.

Responsibilities of Stakeholders

The responsibilities below represent the key commitments of each party involved in upholding the values and principles of this Code. Although not exhaustive, all individuals must act with ethics, responsibility, integrity, and respect — even in situations not explicitly covered in this document.

Company Responsibilities

a) Ensure broad dissemination and understanding of this Code among all internal and external audiences.

b) Maintain secure and effective channels for receiving and handling reports of violations of this Code.

c) Implement corrective measures when necessary to ensure compliance with the guidelines established herein.

d) Promote training and awareness initiatives to reinforce Dynamox's ethical values and principles.

e) Review this Code annually or whenever necessary.

Manager Responsibilities

a) Comply with and promote this Code through leadership, management, and monitoring practices.

b) Continuously communicate this Code and be available to clarify doubts and receive suggestions.

c) Refrain from using their position to influence or coerce hiring decisions from which they may benefit directly or indirectly.

d) Ensure a healthy work environment, free from embarrassment, harassment, discrimination, or any form of prejudice.

e) Identify, prevent, and correct misconduct in the workplace.

f) Proactively map and report risks identified in their area, supporting the implementation of internal controls and mitigation plans in coordination with the Compliance department.

Employee Responsibilities

a) Act in accordance with the principles and guidelines of this Code, safeguarding integrity and ethics in internal and external relations.

b) Report any conduct that violates this Code through appropriate channels, ensuring confidentiality and good faith.

c) Contribute to a respectful and inclusive work environment, avoiding harassment, discrimination, or inappropriate behavior.

d) Use company resources responsibly and avoid conflicts of interest.

Supplier and Partner Responsibilities

a) Respect and follow the guidelines of this Code and the Supplier Code of Conduct in all interactions with Dynamox.

b) Conduct business ethically, transparently, and in compliance with applicable laws.

c) Do not offer, promise, or grant undue advantages, favors, or any form of corruption to employees, partners, representatives, or any third parties directly or indirectly linked to Dynamox.

d) Maintain fair business relationships based on respect for human rights, prohibiting any form of forced or child labor, discrimination, harassment, or violation of freedom of association.

e) Ensure dignified working conditions for their employees, including legally compliant working hours, fair compensation, and safe and healthy environments.

Complaints and Whistleblower Channel

Our Communication and Whistleblower Channel, accessible via BeCompliance – Ethics Channel, is a tool that ensures the integrity of our company and compliance with the ethical principles we uphold. The channel is open to all — employees, third parties, clients, suppliers, and other stakeholders — allowing anyone to report, safely and confidentially, inappropriate conduct, violations of this Code of Conduct and Ethics, breaches of internal policies, or any irregularities that may compromise the company's integrity.

This channel is independently managed by BeCompliance, a company specialized in compliance and corporate governance, ensuring impartiality, absolute confidentiality, and whistleblower protection. Reports may be submitted anonymously or with identification, at the whistleblower's discretion.



Whistleblower Protection

Dynamox guarantees that no individual who uses the channel to report an irregularity in good faith will suffer retaliation, discrimination, or any form of reprisal. If any retaliation occurs, those responsible will be subject to appropriate disciplinary measures.

Investigation of Reports

Reports received will be handled with seriousness, confidentiality, and impartiality by the Ethics and Conduct Committee, which will conduct investigations thoroughly, ensuring proper treatment throughout the process. For the investigation to be effective, it is essential that the whistleblower provides, whenever possible, detailed information and evidence to support the analysis.

The whistleblower may track the progress of the report through the whistleblower channel. Upon conclusion of the investigation, if the report is confirmed, corrective and disciplinary measures will be applied, ensuring that those responsible are held accountable.

Compliance with Internal Policies

All Dynamox employees, suppliers, and service providers must strictly comply with internal policies and standards, ensuring transparency, ethics, data protection, and information security.

Failure to comply with these guidelines may result in disciplinary measures, as established in Dynamox's internal policies and applicable legislation. Such measures may include mandatory training, warnings, suspension, contract termination, dismissal, or termination for cause, depending on the severity of the violation.

In cases involving legal violations, those responsible may also be subject to civil and criminal penalties.



Dynamox

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