



PART 01

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PART 02

PART MANAGEMENT OF THIS CODE



# PRESENTATION

# WORD FROM THE CHAIRMAN

The company's attitudes define itself. That's why, since our foundation, our commitment to respecting people and our way of acting ethically, with integrity and transparency have been responsible for achieving our goals and results.

This Code of Ethics and Conduct brings together these principles, guiding our actions and attitudes in internal and external relations to keep our culture of achievement and sustainable growth.

We work day by day in the development of technology which goes beyond a commercial commitment and the company's growth, it is an ethical commitment to do the best for the world, making a positive impact on agriculture to improve the world's food supply.

I'm counting on everyone's dedication to continue pursuing our objectives correctly, by embodying our values and principles.

Britaldo Hernandez





# APPLICATION AND USE OF THIS THIS CODE



This Code of Ethics and Conduct applies to all employees and anyone who is part of, associated with, or represents Solinftec. Therefore, everyone must know, comply with, and enforce our ethical conduct guidelines.

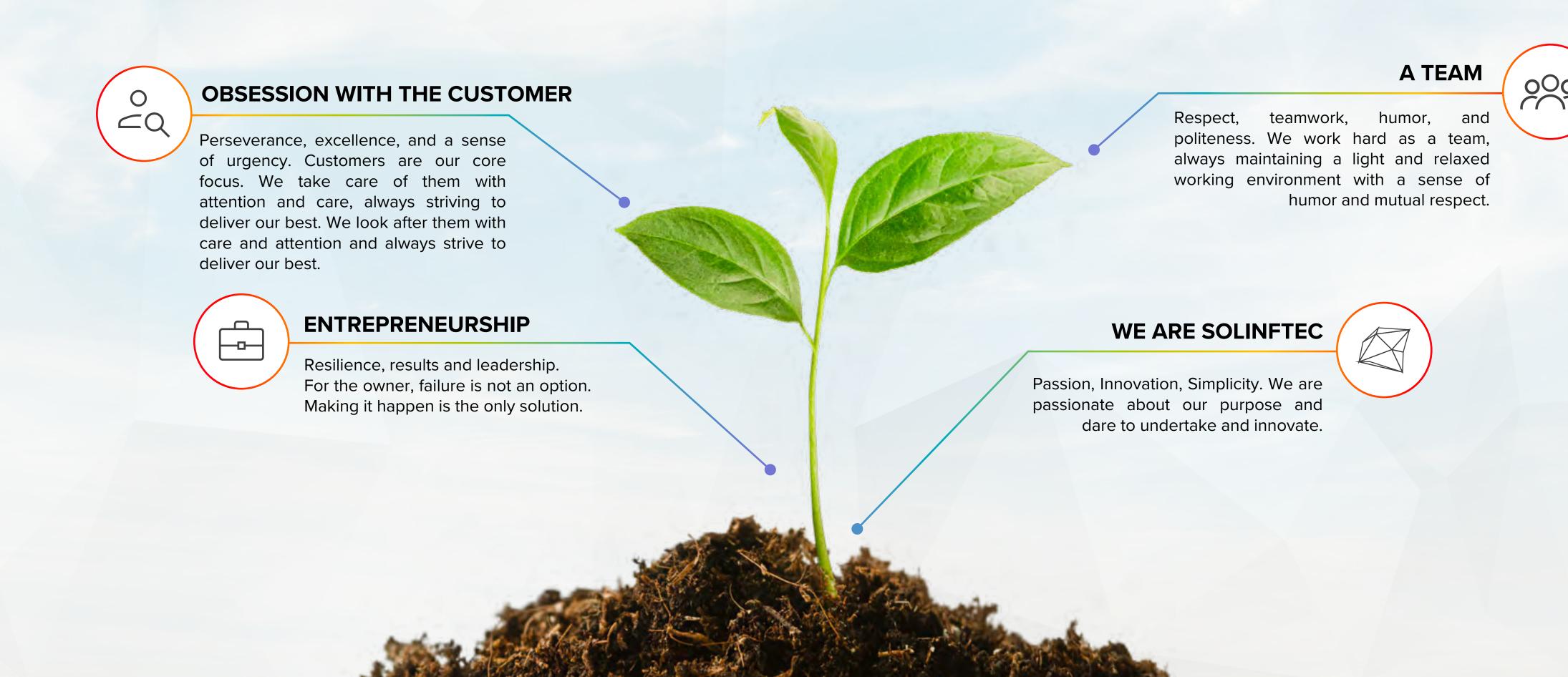
We know that image and reputation are built on our attitudes and choices, so it is very important that everyone pays attention to their ethical conduct inside and outside the organization, as our personal behavior reflects the environment at Solinftec.

Questions related to the application of directives in daily life, the interpretation of this Code, or even topics not found in this document can be clarified by corporate policies, internal policies, or by contacting Solinftec managers and the Compliance area (compliance@solinftec.com)



# PURPOSE AND VALUES

Our purpose is to revolutionize global agriculture through technology. We pursue this by following our values, which foster respect and build trust, solidifying Solinftec's reputation.





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Find out more about our guiding commitments to a proper behavior:



# THE WORKING ENVIRONMENT



Solinftec believes in and invests in inclusion and diversity, with respect as the foundation of all relationships. We value equality and differences.

It is part of the company's daily routine to promote actions that ensure representation for groups of people with disabilities, LGBTQIA+, ethnic and racial backgrounds, foreigners, individuals aged 50 and above, and opportunities for first-time employment.



# AND PREJUDICE

We value the individuality of each person, which is why we do not tolerate any kind of prejudice, humiliation, discrimination or bullying on the grounds of gender, race, sexual orientation, gender identity, age group, religion, place of birth, disability, or any other personal characteristic.



# PROFESSIONAL ATTITUDE

We are all responsible for ensuring a working environment based on cordial relationships, respect and trust.

We ensure that our employees have the same opportunities to develop and improve their skills and are treated fairly, based on their qualifications and performance, respecting their diversity, individuality and privacy.

We value actions that contribute to a friendly and productive working environment:



LISTENING IS AS IMPORTANT AS SPEAKING. PAY ATTENTION TO OTHERS!



BE COURTEOUS AND KIND AT ALL TIMES. AVOID PARTICULARLY CONTROVERSIAL SUBJECTS THAT MIGHT LEAD TO ARGUMENTS.



KEEP YOUR GOOD HUMOR, IT HELPS TO MAINTAIN A PLEASANT AND RELAXED ATMOSPHERE.



BE OPEN TO DIALOGUE; AVOID ENGAGING IN ARGUMENTS.



BE HUMBLE. ARROGANT AND SUPERIOR BEHAVIORS ARE NOT ALIGNED WITH OUR CULTURE.



# HARASSMENT AND A B U S E OF POMFR

Solinftec is committed to promoting and personifying actions that eliminate discrimination and safeguard representation for all individuals, including those within the following protected classes; individuals with disabilities, LGBTOIAt, ethnic and acial backgrounds, foreigners, individuals aged 50 and above, and opportunities for first-time employment.

We take this matter very seriously. Situations that involve disrespect (both moral, verbal and physical), intimidation, or threats in relationships between employees or third parties will not be tolerated at Solinftec.



When harassing or discriminatory conduct is so severe and pervasive it interferes with an individual's ability to perform their job, creates an intimidating, offensive, threatening or humiliating work environment, or causes a situation where a person's psychological well-being is adversely affected.

# **HARASSMENT**

Harassment is unwelcome conduct that is based on race, color, religion, sex (including sexual orientation, gender identity, or pregnancy), national origin, older age (beginning at age 40), disability, or genetic information (including family medical history). Harassment becomes unlawful where:

- 1) Enduring the offensive conduct becomes a condition of continued employment, or
- 2) The conduct is severe of pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

And-discrimination laws also prohibit harassment against, individuals in retaliation for ling a discrimination charge, battling, or participating in any way in an investigation, proceeding, or lawsuit under these laws; or apposing employ ment practices that they remonably believe discriminate against individuals, in violation of these laws

SEXUAL HARASSMENT

Harassment can include "sexual harassment" or unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature. It is unlawful to harass a person (an applicant or employee) because of that person's sex. The harasser can be the victim's supervisor, a supervisor in another area, a co-worker, or someone who is not an employee of the employer, such as a client or customer.

## 08





Health and safety at work are Solinftec's essential commitments to our employees and third parties. Our managers, as well as the Occupational Safety department and the Internal Commission for the Prevention of Accidents and Harassment, are responsible for providing a safe working environment, following all legal provisions regarding safety and in accordance with the Regulatory Norms, including periodic training and the necessary equipment to prevent or minimize occupational risks.

We preserve sustainability in line with quality of life in our working conditions, which is why we do not tolerate forced labor, poor working conditions or child labor.

With a view to caution and care for our people, we stress that it is not permitted:



The use, carrying, keeping or handling of **firearms** or **ammunition** of any kind during work activities and on company property.



The consumption of alcoholic beverages and/or drugs during the performance of your duties, as well as working while intoxicated or under the influence of substances that interfere with our behavior or that may affect the safety of our activities.



Driving Company vehicles under the influence of alcohol or substances that could endanger the life of the employee or third parties.





We value our assets, and it is the duty of all individuals who are part of Solinftec or interact with it to follow our rules for protecting our tangible and intangible assets, whether physical or reputational. Therefore, it is the responsibility of everyone to safeguard the integrity of our image and brand and to use company resources only for Solinftecrelated matters of interest





A conflict of interest arises when, because of self-interest, we are company's ethical or legal principles, making inappropriate decision or failing to fulfill some of our professional responsibilities.

judgment and/or attitudes are distorted in favor of personal interests, to the detriment to those of the organization.

Our employees must not get involved in situations constitute a conflict of interest, meaning situations that affect their ability to act in the best interests of business development and Solinftec.

Potential situations regarding conflict of interest are monitored influenced to act contrary to the and subject to internal control criteria, such as questionnaires, inquiries from interested parties, and audit processes. Therefore, they must be respected by all with a commitment to accuracy in These are situations in which reported data. To avoid situations that may lead to potential conflicts of interest, we have established some rules and principles:





# Existence of degree of kinship and affective relationship between employees:

→ Allowed within the same business area, as long as they are not under the same direct leadership, and/or one is not under the leadership of the other.



# Existence of degree of kinship and active relationship between employees of competing companies:

→ Allowed with the approval of management, Human Resources and Compliance.



# **Emotional relationships or family ties between** employees and business partners (suppliers and third parties) are:

→ Allowed with the approval of management, Human Resources and Compliance.

Communication regarding kinship or personal relationships to management and the Compliance department is essential.

Valuing family and the presence of close ties between our employees and partners are part of our organizational culture. We understand that affective relationships can arise in daily life.

These or any other conflicts of interest should be reported to the Compliance department, either through our periodically circulated conflict of interest forms or voluntarily through the Listening Channel or by emailing compliance@solinftec.com, which also welcomes questions on the subject.



These are activities performed outside of the company's scope.

They are permitted at Solinftec as long as they do not negatively interfere with the work routine and follow the premises below:

- They are not allowed if carried out incompanies and/or related interests.
- ➤ Communicating this activity to management and the area is essential.

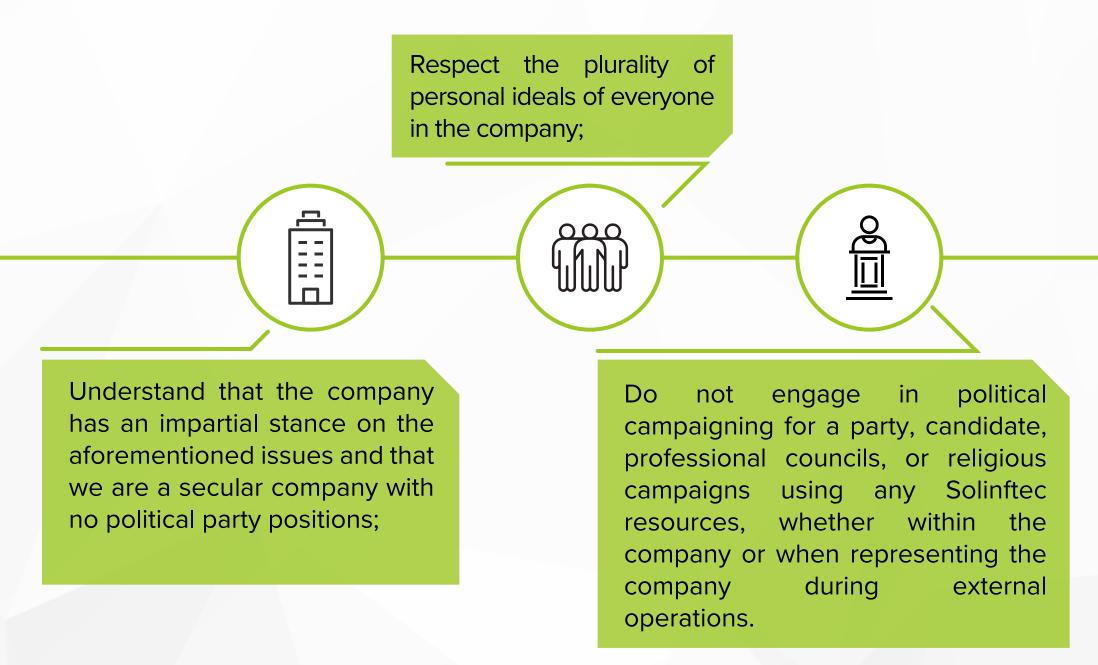
Once authorized, they must be carried out in a diligent, professional and in compliance with the law and internal policies professional manner and in compliance with the law and internal policies, in order to avoid possible conflicts of interest or improper use of confidential information.

Donations to election campaigns or candidates are **prohibited**, as are monetary contributions, sponsorships, payment for fundraising events or the like, whether similar, either before or after the end of such campaigns.





We respect the freedom of political, philosophical, moral, ideological and religious convictions of employees, partners and suppliers. To this end, we have established specific guidelines for all those who interact with the company:



It is worth noting that employees who decide to run for political office must apply for unpaid leave from their professional activities to the management and Human Resources department.





# PREVENTING FRAUD AND FIGHTING CORRUPTION

Fraudulent behaviors involving a breach of trust, misuse of Solinftec's assets, resources, or information, or the provision, offering, or receipt of any benefit to a third party—whether a public official or not—that provides undue advantage to Solinftec or oneself are strictly prohibited. This remains true even if refusing such practices results in a missed business opportunity.

# **EVERYDAY** SITUATIONS

These are examples of fraudulent conduct



- Falsification of company documents
- Improper manipulation of the company's systems
- Tampering with accounting records

Our employees, third parties, suppliers and customers must not only comply with our internal policies and the national and international anti-corruption standards applicable in the places where we do business, but also reinforce the obligation to comply with them in order to prevent, mitigate and remedy the risks of fraud and corruption at Solinftec, anywhere in the world.



Signing documents without authorization or power of attorney



Presentation of false medical certificates



Presentation of invoices or receipts that do not correspond to contracted services.

Employees with questions should consult Solinftec's Corporate Anti-Corruption Policy, available on the company's website, to ensure you — are not engaging in any prohibited behavior.

More information is available in our Anti-Corruption Policy:

https://www.solinftec.com/pt-br/governanca/



# COMPETICONDUCT

Engaging in practices that undermine free competition and freedom of initiative compromises the integrity of the business environment and the fundamental principles of fair competition, while damaging the organization's long-term reputation.

## **Examples of anti-competitive conduct are:**

Manipulating the price of goods or services and restricting production or trade.

Division of markets and obstruction of public tenders.

Promotion of uniform commercial conduct among competitors.

Using deceptive means to manipulate the prices of third parties.

Discriminating against buyers or suppliers through differentiated prices.

Unjustified refusal to sell under normal commercial conditions.

Unjustified interruption of commercial relations.

Unjustified sale of products below cost price.

Destruction, destruction or hoarding of raw materials.

Unjustified retention of goods to cover production costs.

Making the sale of one good conditional on the purchase of another.

Offering or accepting discounts that are not recorded in the amounts to be paid.

Solinftec does not condone this type of conduct, and employees, suppliers, partners, and service providers must avoid engaging in anti-competitive acts.

Concerns should be reported to Compliance via the Listening Channel or by emailing compliance@solinftec.com.



# ACONER ING



The prevention of money laundering is the ethical and legal foundation that supports the integrity of the financial system, safeguarding transparency and guaranteeing the legitimacy of transactions.



The following conduct may be indicative of attempted money laundering and must not be accepted by Solinftec's employees, service providers, suppliers, or partners:

Requests for cash payments, when this is not the only possible or usual means of settlement of an obligation

Requests to make payments to multiple beneficiaries

Requests to make payments by any unusual means

Request for payment to a person other than the supplier or service provider.

Employees, suppliers, partners, and service providers must refuse to carry out any acts when there is suspicion as to their legitimacy and legality.

Suspicions must be reported to Compliance via the Listening Channel or by emailing compliance@solinftec.com.



# PREVENTONS

Solinftec is committed to fighting corruption, which is why it reinforces some practices to be followed by all employees in order to avoid corrupt practices:



- Understand and respect the Anti-Corruption Law, the Code of Ethics and Conduct, and related standards.
- Participate in training and communication activities related to Combating and Preventing Corruption.
- Seek information on third parties and the services to be before contracting.
- Clarify doubts with their immediate manager, the Compliance area, or the Legal department whenever something is out of the ordinary and raises suspicions.

# Avoid or seek further clarification in the event of:

- Contracts foreign to the Company's activity.
- Invoices without an identification number or description of the services provided.
- Meetings with public officials outside the scope of work.
- Proposals of apparent accounting artifice to conceal or in any way cover up payments.
- Refusal to sign contracts containing anti-corruption clauses.

- Ensuring the veracity and transparency of the accounts and financial statements, and keeping the accounting documentation up to date and in accordance with the accounting standards in force.
- Use the Listening Channel to contact Compliance at compliance@solinftec.com when there is a suspicion of inappropriate conduct.
- Act with probity, reliability, loyalty, and fairness in professional relationships.

- Develop a critical sense in order to be able to identify attitudes that may result in undue advantage and not to practice them.
- Manage Solinftec's resources rationally and transparently.
- Take care of your professional reputation.
- Use Solinftec's assets with care and for the purposes for which they are intended.



We support the freedom of all our employees to join, or not join, any trade union or professional organization. We respect trade union freedom and seek to align the interests of the Solinftec group, our employees, and trade unions in a transparent manner.

# DONATIONS AND SPONSORSHIPS

We only make donations and sponsorships for social and institutional responsibility purposes. Before making donations or offering scholarships, Solinftec verifies that the goals align with the company's objectives to drive business growth, raise brand awareness, or enhance communication with our customers, suppliers, and society.

The Marketing, Sustainability, and Compliance departments must approve any donations or sponsorships in advance to ensure compatibility with our objectives, integrity, transparency, and proper documentation.

The procedure for requesting, investigating, and deciding on Donations and Sponsorships must comply with the guidelines of Solinftec's Internal Donations and Sponsorships Policy.

If you would like to contact us about this, we can be reached at: compliance@solinftec.com.





# GIFTS, PRESENTS AND OTHER HOSPITALITY

Although giving and receiving gifts, presents and other hospitality is common in business, this interaction can lead to undue influence or advantage. This is why we have outlined some rules and limitations to guide our actions in this area.

It is not permitted to receive or offer any kind of gifts or hospitality to public officials or third parties related to them.

"A public official is anyone who holds, even temporarily or without remuneration, by election, appointment, designation, contract or any other form of investiture or link, a mandate, position, job or function in state entities."

GIFTS 🚇

These are items of an institutional nature, which have a logo, with the aim of advertising the company, such as diaries, pens, backpacks, key rings, caps, mugs, etc.

We only allow the receipt or offering of gifts up to \$50 per year, to and from the same business partner.

# PRESENTS (1)



These are items that do not fall within the definition of a gift, the giving or receiving of which is intended for personal enjoyment, such as alcoholic drinks, watches, electronic cigarettes, chocolates, flowers, etc.

Gifts of up to \$100 per year may be offered or received to/from the same business partner, if legal requirements are met, and not accepted or offered during the evaluation processes, or prior to awarding the business.

# ENTERTAINMENT AND HOSPITALITY



These are activities intended for fun and personal satisfaction or advantages, such as parties, concerts, social events, trips, airline tickets, vouchers, hotel stays, etc.

As a general rule, offering or receiving such items is permitted if done in a transparent manner, without generating a conflict of interest and without influencing an objective decision in Solinftec's best interests, whether in relation to a negotiation, concession or conclusion of a contract.

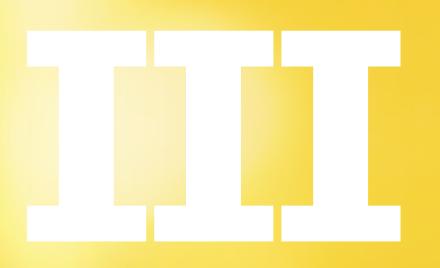
In the case of meals provided or accepted, for example, we suggest a value of up to \$100 per person.

Gifts, presents or hospitality that are offered in breach of our rules must be refused. If for some reason they cannot be politely refused, they should be forwarded to the Human Resources department and informed to the Compliance department compliance@solinftec.com, which will jointly take the appropriate measures as to their destination (either an internal raffle or to a charitable organization).

• Further details on this subject can be found in Solinftec's Internal Policy on Gifts, Presents and Hospitality.

If you would like to contact us about this, we can be reached at the following e-mail address: compliance@solinftec.com.





REGARDING
INFORMATION
SECURITY



USE AND PROTECTION OF DATA AND PRESERVATION OF RECORDS

We take care to preserve Solinftec's assets, which include facilities, systems, furniture, intellectual property, technologies, and others.

Information technology assets, such as phones, emails, internet, software, and hardware, among others, must be used to meet our work needs with care and awareness.





# CONFIDENTIALITY

Our employees must treat all matters involving Solinftec, its employees, clients, and partners that are not known to the market or the general public with secrecy and confidentiality.

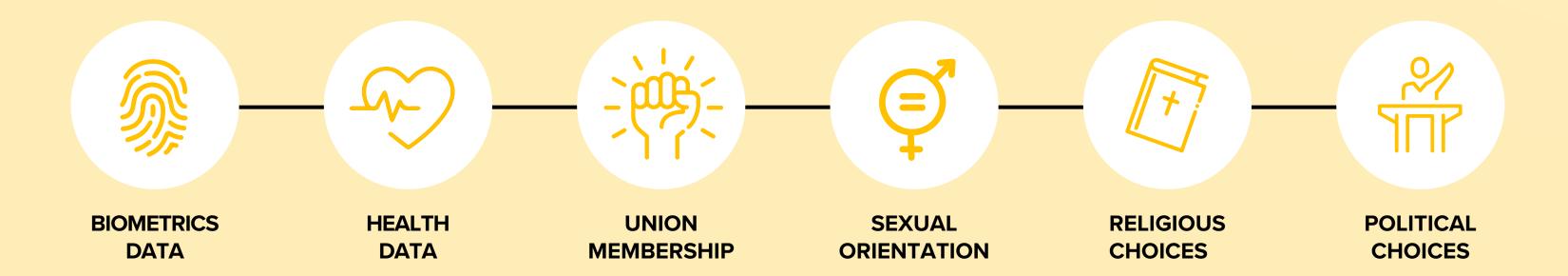
User data, market information, internal events, and other financial, economic, operational, and contractual issues must not be reproduced or disclosed to third parties, including family members, thus protecting the integrity and confidentiality of the information.



# PROTECTION AND PRIVACY OF PERSONAL

In accordance with national and international Personal Data Protection laws, employees must take the appropriate technical and organizational measures to ensure that personal data of employees, customers, and third parties, recorded on paper or in digital format, is processed only for the specific purposes of Solinftec's business and operations, especially for data classified as sensitive.

# For example:





Access to personal data is continuously monitored and controlled, whether in a physical or digital environment. The sharing and disclosure of data managed by Solinftec is based on necessity for our operations or legal obligations, always ensuring that the purpose of the operation is respected. Personal data is disposed of in accordance with legally defined security and retention periods. Individuals have the right to request information from Solinftec about their personal data at any time, as outlined in Article 18 of the LGPD.



# SOCIO ENVIRONMENTAL ENVIRONMENTAL ENVIRONMENTAL

Solinftec's sustainability guidelines are aligned with the United Nations (UN) Sustainable Development Goals (SDGs) and the International Finance Corporation's (IFC) Environmental and Social Management System, as set out in the Company's Corporate Sustainability Policy.

We believe in sustainable economic development and act in compliance with laws and regulations, driving innovation to solve structural problems and challenges in agricultural management. Our solutions optimize resources, increase productivity, and promote low-impact agriculture.

These commitments are part of our culture, guiding strategic and operational decisions, ensuring the proper management of socio-environmental risks, and recognizing our potential to influence the agriculture of the future and improve the quality of life on a global scale.

We monitor the greenhouse gas (GHG) emissions of our operations and are constantly working to reduce them. In addition, we enable the monitoring of agrochemical use in the field to minimize unnecessary applications, reducing dispersion losses and mitigating environmental impacts.

are committed to providing resources for the implementation of effective environmental and social management practices, with a view to continuously improving our performance.

We expect our suppliers and partners to pursue the same goal by continuously improving the efficiency and sustainability of their operations while protecting the integrity of the environment (air, water, and soil) and avoiding negative impacts.

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# WITHTHE > > > > > COMMUNITY

Our social and environmental responsibility is a priority in all our actions and commitments, extending beyond our doors.

We act in collaboration with our partners, suppliers, and customers, as we recognize that shared responsibility is fundamental to effective initiatives in favor of sustainable development.

We seek to strengthen dialogue with neighboring communities and contribute to positive transformations in the places where we operate, monitoring them through specific indicators.

If you have any questions, please contact sustentabilidade@solinftec.com.







# COMMUNICATION AND RELATIONSHIP

# BUSINESS COMMUNICATION



Solinftec values ethical, transparent, and consistent communication in shaping public opinion and sharing our vision. We recognize the importance of engaging thoughtfully with the media and the public, especially in a competitive market. For employees engaging in business-related discussions, conferences, or interviews, Solinftec encourages thoughtful and responsible representation that reflects our core values. We are committed to providing support and guidance to team members as we continue to expand our brand presence.





Solinftec values the unique insights and experiences of our employees and recognizes social media as a powerful tool for sharing these stories. Team members are encouraged to share authentic moments about Solinftec and highlights from their work with Solix, including field experiences and interactions with our technology, in a way that positively reflects our core values and commitment to transparency.

When sharing Solinftec-related content on personal profiles, we trust employees to use good judgment and respect the company's brand. Posts should aim to provide an honest perspective, without suggesting official company positions or commitments. If employees are unsure about the appropriateness of any content, Solinftec's leadership and marketing teams are available to offer guidance.



# CUSTOMERS, SUPPLIERS, AND SERVICE PROVIDERS

We strive to meet high standards of excellence and quality in our products and services, generating value for our customers through a high level of service and upholding fair competition, which is essential for the development of the market and the interests of society.

Our business partners, suppliers, and third parties are essential to the consolidation of our company and must therefore have a good reputation and act responsibly.

In addition to the ethical principles and guidelines set out in this Code, we have established social and environmental guidelines for Solinftec's entire supply chain, business partners, and service providers, outlined in our **Partner Manual** (https://www.solinftec.com/pt-br/governanca/), which can be consulted at any time on our website.







# MANAGEMENT OF THIS CODE

# DISCLOSURE, DISSEMINATION AND REVIEW

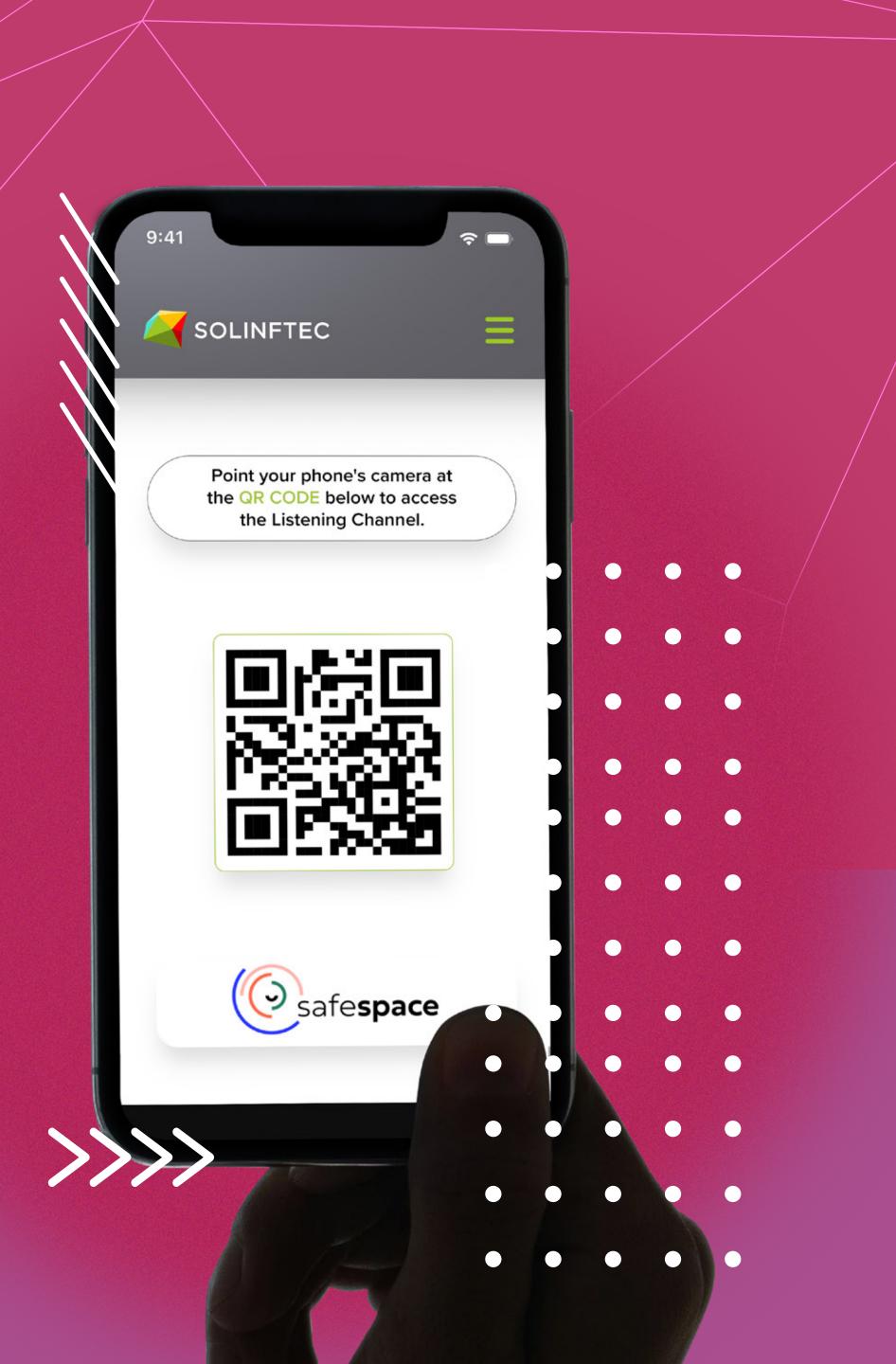
This document was developed by our Solinftec employees and reflects our ethical guidelines and principles. It is everyone's role to communicate and share it. It is reviewed periodically and coordinated by Solinftec's leadership and the Compliance department.

# **ETHICAL COMMITTEE**

Solinftec has an Ethics Committee, made up of members of the company, which is responsible for promoting proper conduct throughout all business areas, as well as receiving, investigating, analyzing, and submitting to senior management any cases of deviations from conduct and ethical behavior.





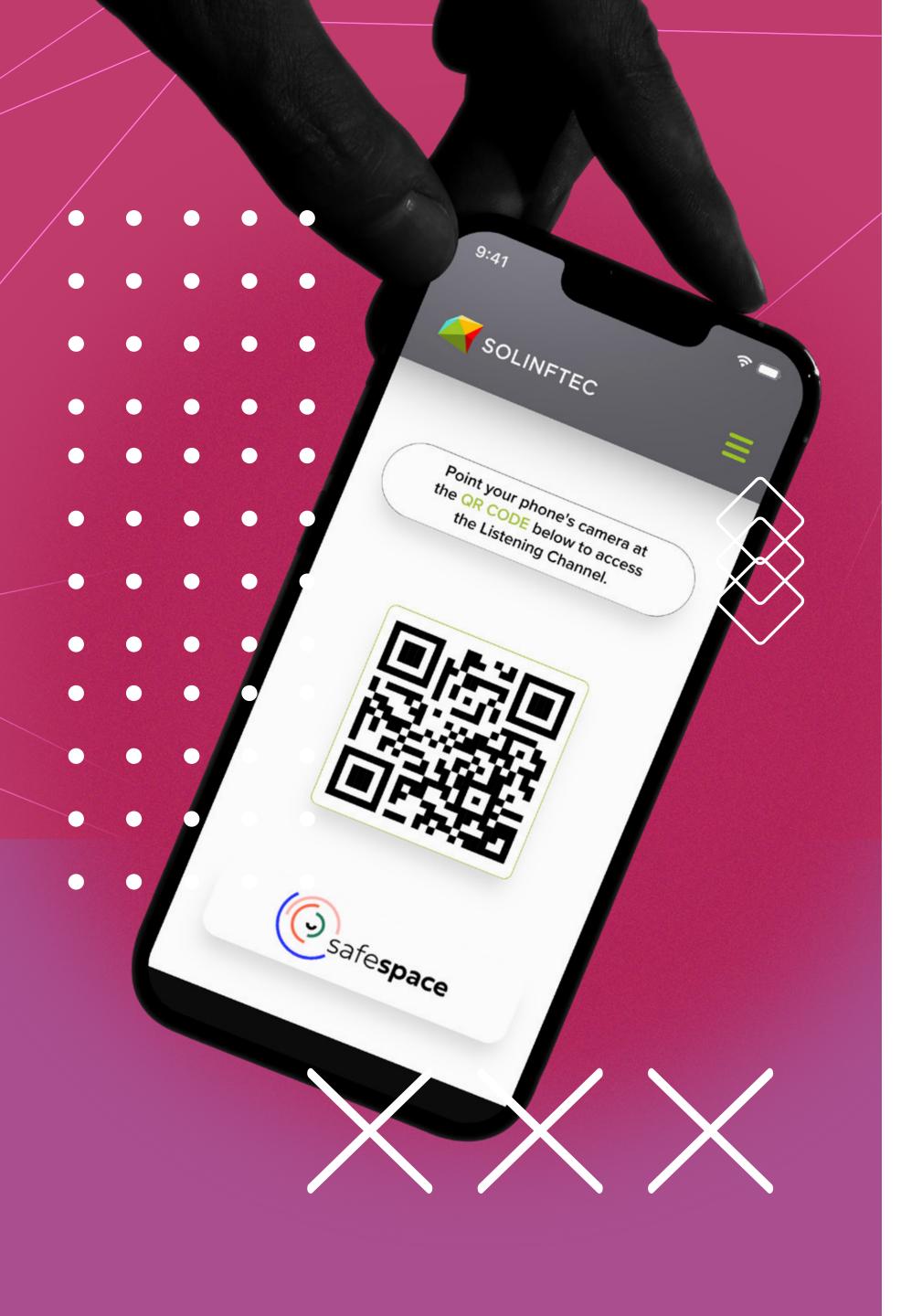


# LISTENING COUNTY COU

We offer employees, suppliers, partners, service providers and anyone else who is interested access to our Listening Channel, an important communication tool for reporting and answering questions and/or concerns regarding discomfort, illegal or unethical business conduct and any violations of ethical guidelines and values.

We encourage people to report acts, facts, concrete conduct or suspicions of inappropriate conduct in good faith, because it's the right thing to do! Our Listening Channel is managed by a specialized third-party company, which, through an online platform, guarantees the confidentiality and anonymity of the information reported, respecting the wishes of the reporter. Reports can be submitted anonymously or with identification. Individuals that report issues can track the status of their reports using a unique tracking code.

In addition to reports of discomfort and/or legal and ethical irregularities, such as acts of harassment, sexual harassment, non-compliance with regulations, corruption, fraud and other irregularities provided for in Law n. 12.846/2013, our Listening Channel can be used to answer any and all questions regarding the company and/or any business area. In addition to reports, questions can also be asked in an identified or anonymous way.







# **CONSEQUENCE MANAGEMENT**

Violations of national and international laws, the Company's internal policies, or the guidelines of this Code may result in disciplinary measures, including warnings, suspensions, or dismissals with or without cause.

Suppliers, third parties, and business partners are also subject to sanctions, such as contract termination, suspension of services/products, severance of business relationships, and/or exclusion from future partnerships.

We value total transparency in our relationships, and whenever necessary, in addition to our Listening Channel, the Compliance department can be contacted at: compliance@solinftec.com.



# **NON-RETALIATION POLICY**

We encourage transparency in our relationships, which is why we do not tolerate any retaliation against those who ask questions or show concern when reporting possibly inappropriate behavior, when done in good faith.

Retaliation is also a violation of this Code and therefore subject to disciplinary action.

