



## CODE OF ETHICS AND CONDUCT



## MESSAGE FROM OUR CEO



Dear Colleagues, what we believe in!

At Readiness IT, we care fundamentally about doing things well and doing the right things! Commitment is and always will be one of our values, along with transparency, the non-negotiable crease in operating under the highest ethical standards, and positive differentiation in everything we propose to do. With transparency, sharing, and commitment in everything we do, that's what makes us special.

We go beyond mere compliance, because of our commitment to acting as an accelerator of digital transformation, taking advantage of and learning the lessons from all the experiences we have the opportunity to experience, we always put our knowledge and cumulative learning at the service of our clients, assuming as our purpose to empower people in the next generation of digital experience, with concern for responsibility, inclusion, integrity, and sustainability for the businesses that support it. Therefore, we invest in training our people, so that they can always make decisions and act as agents of digital transformation with responsibility and speak with confidence.

With our Code of Ethics, we want to help our people make ethical behavior a natural part of what we do every day - with each other, with our customers and our business partners, as well as our communities worldwide.

Our Code is more than just a document; it is in fact what we believe, how we live, and how we lead. It is ever-present in everything we do. It's how we have built and grown the reputation of Readiness IT in the global marketplace to which it is exposed. This is how we put our customers and our people first as the main pillar of our existence. This is how we deliver and act with integrity in action... every single one of us, at every single moment!



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## OUR GOAL

This code is an extension of our core values. It sets out the standards of conduct that we expect from each other and owes to our customers and business partners. These standards apply to everyone who works for Readiness IT (employees, directors, and every member of our board of directors). Everyone is expected to respect the values, principles, and rules of the Code during their professional activities inside and outside the company as well as in their external relations with partners, suppliers, and customers.

Our Code represents our commitment to doing the right thing and defines the standards of conduct that should motivate each of us. It involves accepting certain responsibilities, respecting the rights and feelings of others, and refraining from behavior that could be harmful to ourselves, our peers, or to Readiness IT. It is only through our individual and daily respect for our principles and their guidance that we will ensure the ethical leadership of everyone in our company.

Our business partners are asked to follow these same principles as well. This will enable all of us to share the standards of integrity, accountability, transparency, and respect for all policies, procedures, laws, and regulations. Each of us has the responsibility to understand and comply with these laws.





## WHO IS READINESS IT?



Readiness IT acts as a digital transformation accelerator to create a digital advantage for enterprises and society, with local presence and global capabilities. With deep insight and understanding of customer culture, strategic and business drivers, Readiness IT provides fit-for-purpose services and solutions for customers to increase their business agility, growth, and innovation. With a group of people with extensive knowledge in telecommunications, we are one of the leading communities of technology and business professionals.

Readiness IT offers high-quality services and solutions that challenge customers' current needs and accelerate business innovation.

### PURPOSE

With Readiness IT's expertise, new technologies, and data, we empower people in the next generation of digital experience!

### MISSION

Acting as a digital transformation accelerator, it creates a digital advantage for business and society, with local presence and global capabilities.

### VALUES

Transparency, Sharing, and Commitment are more than values in our company, they are our way of life and work. New employees practice these values in their day-to-day lives, doing it by example.





## OUR RESPONSIBILITY TO OUR COLLABORATORS



### Respect and Dignity

We promote respect and reciprocal treatment, with dignity among all, and in promoting an atmosphere of open, loyal, and trusting communication.

We encourage the sharing of skills, experiences, cultures, knowledge, and the spirit of mutual help among all, to provide a healthy organizational climate and to foster team spirit.

We are committed to treating all employees fairly, as well as the applicants to our job offers, being selected for their qualifications, and demonstrated abilities.

As a multinational company, we work to comply with and respect all laws and regulations in the countries where we operate, respecting local cultures and traditions. Employees must act in strict compliance with applicable laws and regulations and in accordance with the responsibilities assigned to them, always with competence, rigor, care, and transparency.

We do not tolerate harassment behavior, whether moral or sexual, stalking, racism, homophobia, situations of humiliation, including forms of intimidation, namely the practice known as bullying/mobbing and bad faith reporting.

Any kind of discriminatory behavior, harassment, or inconvenience to any employee should be reported to the Director of each BU, or to our People & Culture department.



## Inclusion and Equal Treatment

Our policy is to respect the diversity, rights, and choices of each person, and do not discriminate against our people or others because of age, gender, race, sexual orientation, religion, disability, nationality, culture, medical condition, economic situation, employment status, etc.

As Readiness IT is in different countries, cultures, and continents, we inevitably have people of various nationalities, creeds, sexes, races, and sexual orientations. We are a company that values diversity and treats each of our employees with dignity.

In our recruitment processes, as well as in labor relations, in people's evolution and development, in their promotion or leaving the company, we do not discriminate in any way. There is no difference in the treatment of our employees, we value diversity and promote an inclusive environment, creating opportunities in a fair and equal manner, based on each person's achievements.



## Training and Development

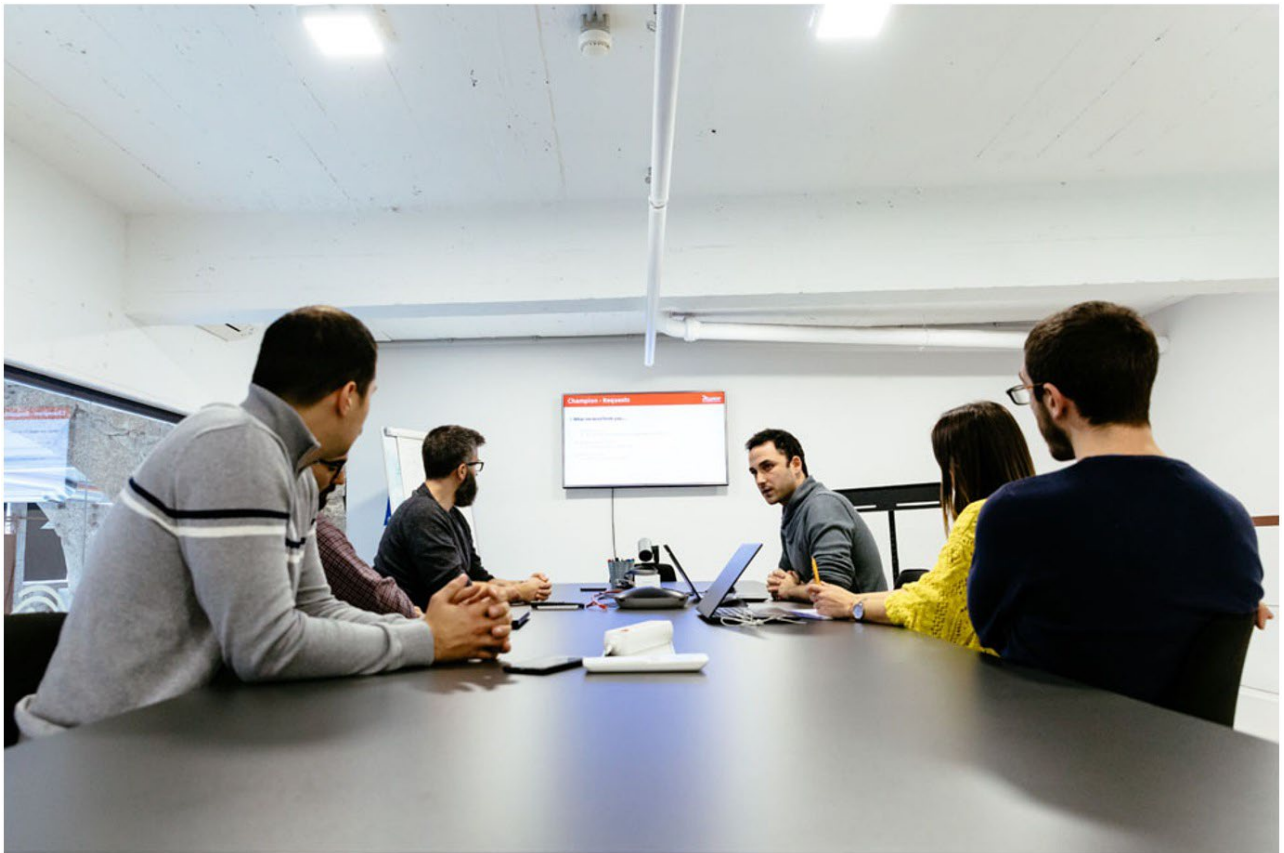
Readiness IT constantly promotes and invests in adequate training for its employees, to enhance their performance, growth, motivation, and value. We recognize our responsibility to support and contribute to our employees' development, to help them with their training, to keep them motivated, and to value their autonomy, commitment, and responsibility by recognizing their merit. Readiness IT stimulates initiative, competence, proactivity, creativity, good ideas, accountability, and delegation of tasks.



## Personal Data Protection and Professional Secrecy

We are committed to strictly complying with the data protection legislation in force in each of the jurisdictions in which guarantee the effectiveness of the rights arising therefrom.

We are committed to our employees to scrupulously comply with the data protection principles set out in the applicable legislation and internal rules in the performance of our duties. We protect the privacy and confidentiality of employees' personal records.



We do not compromise the trust our employees place in us by not disclosing confidential information to any person without a specific and necessarily need to do so.

At Readiness IT employees are subject to professional secrecy, whether during or after the performance of their duties, and to strict compliance with current data protection laws and regulations. Since we operate in other jurisdictions, not only nationally but also internationally, we also commit to comply with the data protection legislation in force in each of these jurisdictions.





## Good Working Environment with Respect for Health and Safety Standards

Well-being and safety in the workplace are important to Readiness IT. We are committed to providing a healthy, professional, and safe working environment for all our employees and anyone who visits our sites.

We provide the resources necessary to prevent occupational risks, to improve the safety, hygiene, and well-being conditions necessary for the proper performance of activities.

We guarantee that there are no threats or acts of violence, abusive behavior or use of drugs, narcotics, or other illicit substances, or consumption of alcohol during working hours.



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*We call ethics the set of things people do when everyone is watching. The set of things people do when no one is watching is called character.*

*-Oscar Wilde*



## OUR RESPONSIBILITY TO OUR CUSTOMERS/PARTNERS

### Compliance With the Law

We observe and exercise due diligence in complying with the legal and regulatory duties applicable in each jurisdiction where Readiness IT operates. We respect the local cultures of the operations where we are located, both nationally and internationally, and are committed to contributing to their socio-economic progress and development.

### Transparency and Integrity

One of our core values is transparency, and in performing our duties we comply with the law and best practices. We deal fairly and ethically with our customers, suppliers, and business partners.

At Readiness IT, we are professional and show respect in every commitment we make. When we celebrate a contract, we honor it and fulfill our obligations, make sure that the agreed-upon conditions are strictly adhered to, and do not participate in any fraud scheme or falsification of any documents or information.

It is our obligation to treat all information, whether financial or non-financial, in an authentic manner, to comply with legal and internal requirements for the treatment of documentary information, to provide complete, factual, and truthful statements, and to ensure the integrity, accuracy, and clarity of published information.

We make it a point to deal fairly and honestly with our customers, suppliers, business partners, and even our competitors. Never make disparaging comments about our competitors or make unfair comparisons between our products and services and those of a competitor.

At Readiness IT the laws, antitrust and unfair competition, are meticulously applied and respected and any violation of them can result in serious sanctions for Readiness IT and its employees.



## Confidentiality and Professional Secrecy

All the information we have knowledge of while performing our duties is for strictly internal use and its confidentiality must be kept. We undertake not to share outside the company any information Readiness IT has or is accessible to employees in the performance of their duties.

Information such as business plans or strategies, financial information, intellectual property, sales, projects, technologies, operations, contracts, personal information, techniques, human resources, trade secrets, third-party information and non-public information is considered sensitive and confidential.

## Data Protection

At Readiness IT we ensure the protection of our customers' data and treat it fairly and transparently.

We make sure that our customers' personal data is not transmitted without their consent, unless such consent is not legally required, or the sharing of such data is required by law.





## Communication

We consider information quality to be fundamental, and for that reason, we are rigorous in sharing any kind of communication made by our company, be it internal or external.

Any Readiness IT employee must not share with the outside world confidential information that he or she has because of performing his or her job or even when not performing his or her job and accidentally having it in his or her possession.

We are committed to using social networking and traditional means of communication in an ethically responsible way and not using them in ways that expose private or confidential information about the company and our employees.

To guarantee this commitment, we have a dedicated department designated for this purpose. Only our people from the Marketing and Communication department are authorized to authenticate and disseminate the information externally, with the media and social networks, so that the communication is reliable, transparent, trustworthy, and ethically responsible.



## Conflict of Interest and Corruption

Readiness IT is committed to developing and enforcing internal standards aimed at preventing conflicts of interest.

A conflict of interest exists when we have conflicting personal interests that interfere or may interfere with our ability to make an objective business decision. These types of situations can be financially damaging to our organization or can tarnish our reputation or the trust that others place in us and must be avoided.

We, therefore, do not tolerate fraud, corruption, abuse of power, bribery, or the falsification of any documents or information. We do not accept that these acts are carried out by our employees, or third parties that are related to us in the exercise of our activity and may result in a conflict of interest.

We commit to act in an open, transparent, and corruption-free manner, and not to influence the decisions of our business partners illegally, avoiding behaviors that may imply benefits for oneself or family members.



## Advantages and Bribes

Our employees must not offer any improper advantage of any kind to win or retain business to a third party. Nor should they accept any advantage in exchange for any advantageous treatment from a third party.

Benefits such as loans, invitations, gifts, hospitality, or other benefits or favors, by virtue of and during their professional activity, must be lawful and must not be frequent or extravagant, nor intended to improperly influence decision-making.

Before receiving or offering any gift or benefit, each of us is responsible for ensuring that it is permitted in accordance with laws and ethical standards.





## OUR RESPONSIBILITY FOR SUSTAINABLE DEVELOPMENT

At Readiness IT, we work towards sustainable development in economic, social, and environmental terms. We promote the adoption of the best environmental practices and ensure environmental protection in projects, as well as the efficient use of energy, materials from sustainable sources, and the incorporation of safe and innovative technologies in our day-to-day and in the various centers where we are.





## **VIOLATION OF THE CODE OF CONDUCT**

All recipients of the code are bound to observe and use it responsibly.

As Readiness IT is a company that acts according to the value of transparency, and advocates open and honest communication, we guarantee a workplace in which employees can report any incidence or violation of the code without fear of retaliation.

Thus, in a situation where any of us suspect or become aware of any violation of the code, or applicable law, you should report it immediately to your Mentor or People & Culture.

Any behavior contrary to the Code, whether committed by act or omission, by an employee, business partner, supplier, or customer, is punishable and could put the Company at substantial risk.

Failure to comply with the Code constitutes a punishable disciplinary offense, without prejudice to the criminal or civil liability to which the facts making up the violation may give rise.





## FAQS

### 1 Does our code apply equally to all our Readiness IT operations?

Yes, always in accordance with the applicable law and the rules in force in each jurisdiction where we are located, it may undergo some adaptations considering the legal reality of each operation.

### 2 What is considered harassment?

Harassment can be manifested in verbal, written, or physical form, or other action that is degrading, or shows hostility or dislike toward an individual.

### 3 What are examples of harassment?

- Insulting jokes and comments that demean the other person.
- Derisive, offensive, or abusive comments.
- Threats or intimidation that create an uncomfortable environment.
- Creating a negative image (stereotyping).
- Having offensive objects, material, or images or that belittle or create dislike for an individual or group in the workplace.

These manifestations can be in physical form or communicated by e-mail or social networks.

### 4 If I am the victim of harassment or bullying or witness behavior of this nature, how can I make sure it is covered by this Code?

You should report it internally to your Mentor or People & Culture.

### 5 If because of having communicated as provided in this chapter I suffer any kind of retaliation, how should I proceed?

At Readiness IT, we have zero tolerance for retaliation, for anyone who in good faith reports knowledge or reasonable suspicion of behavior that is incompatible with our code and should be reported to Mentor or People & Culture.

### 6 Can I refuse to cooperate with the inquiry process foreseen in this chapter?

No. The cooperation of everyone in the inquiries, besides being extremely important, is our duty as recipients of this code, including to external entities that support this type of situation.



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