



webcore

# CODE OF ETHICS AND CONDUCT

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# 1. MESSAGE FROM LEADERSHIP

First of all, we want to thank you for being part of our history. This Code of Ethics and Conduct was created to guide us in our daily lives, ensuring that all our decisions and relationships are based on respect, responsibility, and transparency.

Here you will find principles we truly believe in — not just rules written on paper. Our culture is built by each person in the company, and we count on you to sustain an environment where everyone can work with confidence, safety, and pride.

We are together on this journey. May this document be an aid, a reference, and a reminder that acting with integrity is part of who we are and what we want to build in the future.



## 2. The Webcore Culture

At Webcore, we believe it's people who make the difference. We build our culture by placing human relationships at the core of everything we do. We value open dialogue, collaboration, and caring for those around us — because we know that good ideas emerge in environments where everyone feels safe to contribute.

Here, inclusion is not just a pretty word: it's a daily commitment. We respect every story, every journey, and every point of view. We celebrate diversity for we understand that diverse teams can come up with better, more creative, and more human solutions.

We are also strict about one essential point: we do not tolerate any type of discrimination, harassment, or attitude that compromises anyone's dignity. Our coexistence must always be guided by ethics, empathy, and mutual respect.

Webcore is built by real people, with different experiences and unique talents. And this mix is precisely what makes our environment so special. Together, we cultivate an environment where everyone can grow, express themselves, and be part of something bigger.

## 3. Scope, Application, and Responsibility for Compliance

This Code of Ethics and Conduct applies to WEBCORE INTERACTIVE, WEBCORE GAMES, as well as to affiliated, controlled, or controlling companies in which the group has shareholding, significant influence, or a direct management relationship.

For the purposes of interpreting this Code, the term “**WEBCORE**” shall jointly and indistinctly refer to all the companies mentioned above, as well as their administrators, directors, board members, employees, interns, interns, representatives, agents, and any other members who, by contractual link or de facto relationship, act on behalf of the group or in its interest.

The purpose of this Code is to establish principles, values, and standards of behavior that guide all relationships, decisions, and activities conducted by **WEBCORE**, promoting an ethical, transparent, and coherent culture in all its operations, units, and partnerships.

## 3.1 Scope, Application and Responsibility for Compliance

The guidelines contained herein also apply to all employees, managers, partners, directors, service providers, suppliers, clients, business partners, and representatives who act, directly or indirectly, on behalf of or in the interest of any company belonging to **WEBCORE**.

A **WEBCORE** demands and promotes compliance with this Code by all stakeholders, expecting employees, partners, associates, service providers, suppliers, representatives, and clients to act in accordance with applicable laws, norms, and regulations, observing ethical conduct compatible with the principles established herein and with the WEBCORE Culture.

A **WEBCORE** believes that the work environment should be a space of respect, diversity, and human development. No type of discrimination, prejudice, harassment, or abusive behavior is compatible with our values.

We promote diversity in all its forms: gender, race, sexual orientation, age, disability, belief, origin, and thought. We believe that differences enrich creativity and strengthen innovation.

Everyone must contribute to a healthy, welcoming, and intimidation-free work environment. Respecting others is respecting **WEBCORE**.

## 4. Work Environment and Respect in Relationships

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## 4.1 Work Environment and Respect in Relationships

A **WEBCORE** does not tolerate under any circumstances:

- Discrimination of any kind, including by race, color, ethnicity, gender, gender identity or expression, sexual orientation, age, disability, religion, origin, appearance, marital status, or social condition.
- Sexual, moral, psychological, or virtual harassment, at any hierarchical level.
- Abusive behaviors, threats, humiliation, sarcasm, or intimidation.
- Offensive language, inappropriate jokes, or gestures with sexual connotations.
- Inappropriate exposure of colleagues in physical or digital environments.
- Retaliation against anyone who reports a conduct violation or participates in an internal investigation.



## 4.2 Work Environment and Respect in Relationships



We acknowledge each person's right to express their individual beliefs and choices, including political and ideological beliefs, as long as they do so with respect, peacefully, and without imposing opinions, practicing discrimination, coercion or proselytism, ideological, political, or religious persuasion or indoctrination, or any form of hate speech and manifestations, within the workplace or any institutional space.

A **WEBCORE** commits to investigating and adopting appropriate measures in response to any report or finding of inappropriate or illicit conduct. Prevention, listening, and accountability are part of our commitment to an ethical and safe work environment.

## 5. Governance and Legal Compliance

**WEBCORE** adopts corporate governance practices guided by transparency, equity, accountability, and corporate responsibility.

All members of **WEBCORE**, regardless of their position or function, must observe and comply with the laws, regulations, and internal rules applicable to the company's activities.

No commercial goal, deadline, or expected outcome justifies the breach of legal or ethical rules, or the guidelines established by this Code.

Leadership is expected to act as an example, promote understanding and application of this Code's guidelines by their teams, encourage compliance with integrity standards, and support continuous training and awareness initiatives regarding ethics, conduct and compliance.

**WEBCORE** is committed to continuously improving its Governance structure, responsible for the supervision, review, and strengthening of internal control mechanisms, auditing, risk management, as well as internal procedures for communication, analysis, and treatment of issues related to integrity and compliance with this Code.

## 6. Integrity and Professional Conduct

Every person who acts, collaborates, or relates professionally with **WEBCORE**, directly or indirectly, must adopt ethical, upright conduct, aligned with this Code. It is everyone's duty to comply with applicable laws and regulations, observe internal policies, and protect **WEBCORE's** resources, reputation, and image, preserving trust in the organization and its stakeholders.

The equipment, systems, data, information, and other resources made available by **WEBCORE** are intended exclusively for the performance of professional activities and must be used ethically, safely, and responsibly. It is everyone's duty to ensure the integrity, confidentiality, and protection of these assets, avoiding any conduct that may expose the company to operational, legal, reputational, or information security risks.

Transparency is an essential principle of **WEBCORE's** internal and external relations. Communication with colleagues, clients, suppliers and partners should be guided by clarity, correctness, and good faith, acknowledging and communicating errors, doubts, or inconsistencies in a constructive way. Honesty is a non-negotiable principle and the basis for trust in the relations that sustain **WEBCORE's** purpose and reputation.

## 7. Freedom of Expression and Responsibility for Corporate Image

**WEBCORE** acknowledges and respects each person's right to freely and consciously express their political, religious, or ideological opinions, beliefs, and preferences. However, it is everyone's responsibility to ensure that such manifestations are made on a personal basis, outside the work environment and without undue association with the **WEBCORE** brand, image, or official and institutional channels. No one is authorized to speak on behalf of **WEBCORE** and its affiliates without prior, express, and written authorization, duly signed by its legal representatives.

It is expressly forbidden to use the name, logo, uniforms, corporate email addresses, institutional social networks, corporate environment, or any other means linked to **WEBCORE** to promote opinions, campaigns, political parties, ideological movements, or religious manifestations.

The company repudiates and does not tolerate any form of hate speech, discrimination, harassment, intimidation, or manifestation that violates human rights, offends the dignity of individuals or groups, or promotes intolerance of a political, religious, ethnic, gender, sexual orientation, or any other nature.

All public expressions, including on social networks, must observe the principles of this Code, maintaining respect, moderation, and discernment, so as not to create confusion between personal opinions and the company's institutional positions, nor to affect its reputation, neutrality, or image before clients, partners, and the general public.

## 8. Conflicts of Interest and Transparency

The basis of all **WEBCORE's** business relations are ethics, transparency, and professionalism. Our clients, partners, and suppliers must trust our services, confident in our commitment to diligence and focus on the best results.

However, no result justifies unethical, illegal conduct, or conduct that could compromise the company's reputation. Therefore, all employees and representatives of **WEBCORE** must carry out their activities based on integrity, impartiality, and compliance with laws, internal policies, and good governance practices.

Any situation in which personal, family, financial, commercial, or any other interests may influence or appear to influence professional judgment, decision-making, outcome, or performance of duties on behalf of **WEBCORE** is considered a conflict of interest. These are examples of conflict of interest:

- Taking part in decisions involving companies that belong to family members or close friends;
- Use internal information from **WEBCORE** for your own benefit or for the benefit of third parties;
- Accepting gifts, favors, advantages, or invitations that may create implicit obligations;
- Engage in external activities or parallel businesses that interfere with impartiality or compromise the time and resources dedicated to **WEBCORE**;
- Maintaining personal or professional relationships that may affect objectivity in conducting negotiations, hiring, or establishing partnerships.

## 8.1 Conflicts of Interest and Transparency

Whenever there is potential or apparent conflict of interest, or doubts about it, the employee must report the situation to their direct leadership or the manager responsible for the related contract, project, or activity, before making any decision.

If the potential conflict involves the leadership or manager themselves, the employee must report the fact directly to the partners or the legal representative of **WEBCORE**, so that the situation can be analyzed appropriately and impartially.

**WEBCORE** repudiates any form of corruption, fraud, bribery, or unfair market practice. Competition must always be fair, and all commercial decisions, including pricing policies, must be made independently, without exchanging sensitive information with competitors or third parties.

The confidentiality of strategic information, customer data, and contractually protected content is mandatory and must be sustained even after the professional relationship ends.

No employee shall suffer any form of retaliation for making a good-faith report, it being their duty to act with transparency to preserve the trust, integrity, and reputation of **WEBCORE**, avoiding ethical and legal risk, as well as risks to its corporate image.

## 9. Relationships with Clients, Partners and Suppliers

Our clients, partners, and suppliers are an essential part of the **WEBCORE** ecosystem and must share the same values of integrity, transparency, and respect for people.

All negotiations must be conducted clearly, fairly, and professionally, with well-defined contracts and scopes of service, transparent payment mechanisms, and compensation compatible with the level of complexity and quality of the services provided. A **WEBCORE** rigorously fulfills its commitments and expects the same from all those with whom it relates.

**WEBCORE's** suppliers and business partners must maintain compliance and integrity practices, acting in strict observance of current legislation and good labor, tax, environmental, and safety practices. The use of child labor, forced labor, or labor analogous to slavery is strictly prohibited, as is any form of discrimination, harassment, abuse, or violation of human rights.

**WEBCORE** adopts technical, ethical, and objective criteria for choosing and keeping suppliers and partners, considering, among other aspects, the performance, quality, sustainability, and integrity of the organizations with which it relates. There is no room for personal favors, exchange of advantages, or any conduct that could compromise the impartiality, transparency, or credibility of business relationships.

## 9.1 Relationships with Clients, Partners and Suppliers

As a practice, **WEBCARE** carries out integrity and transparency procedures in the evaluation of institutional and commercial partnerships, which may include reputational analyses, consultations with public sources and media research, in order to verify the compliance and ethical history of potential partners and suppliers.

**WEBCARE** may request documents, statements, or additional information whenever it deems necessary, to verify whether its partners, suppliers, and other individuals or organizations with whom it maintains business relationships adopt good practices, comply with current legislation and have values aligned to the company's.

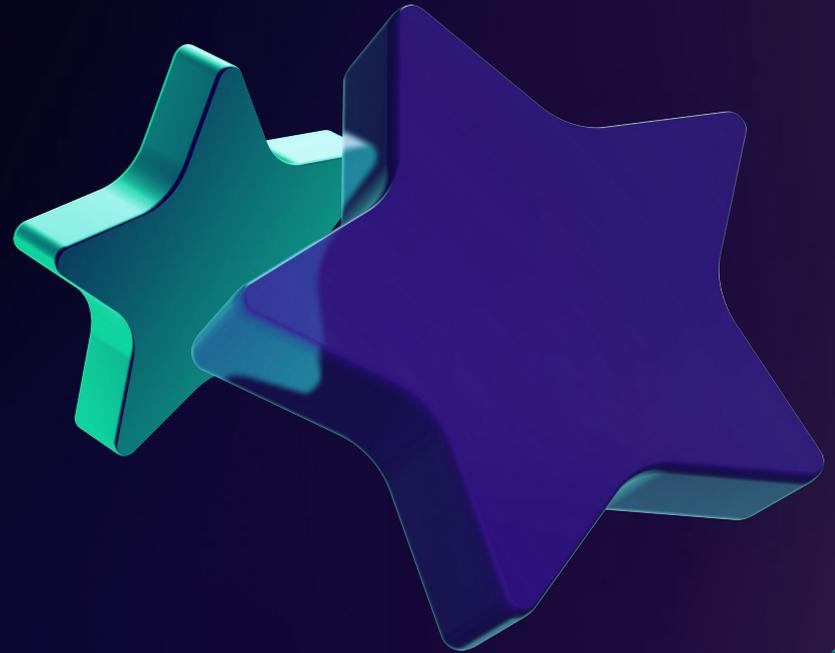
During the term of commercial relations with partners and suppliers, **WEBCARE** may periodically monitor and evaluate the activities carried out, especially in situations where the partner directly or indirectly represents the company's interests before public agents, governmental institutions, or political authorities.

It is expressly forbidden for any person who has a direct or indirect relationship with **WEBCARE** to offer, promise, request, or accept any type of undue advantage, be it direct or indirect, that may generate conflicts of interest or affect commercial decisions, whether in relation to collaborators, third parties, public agents, or any other interlocutors. Any payments made must have a lawful basis, a legitimate purpose, and contractual or legal provision.

## 9.2 Relationships with Clients, Partners and Suppliers

The commercial, technical, and strategic information shared with **WEBCORE**, or provided by it to third parties, must be treated with absolute confidentiality and used exclusively for the purposes of the established relationship. Its use for any other purposes is forbidden.

If any action incompatible with the principles of this Code of Conduct, with legislation, or with good governance and compliance practices is identified, **WEBCORE** may adopt the necessary measures, including the suspension or termination of the contractual relationship or legal procedures.



# 10. Business Integrity, Prevention of Corruption, Money Laundering, and Illicit Activities

**WEBCORE** operates in strict compliance with current laws and does not tolerate any form of corruption, bribery, fraud, money laundering, or illicit practice. All conduct that violates, by action or omission, the organization's values or applicable legislation, including, but not limited to, the Anti-Corruption Law, the Peocedural Impropriety Law, the Bidding Law, and the Money Laundering Law, is prohibited.

It is strictly forbidden to offer, promise, authorize, request, or accept payments, donations, favors, or any other benefit with the objective of influencing decisions, directing business, or obtaining undue advantages, whether in public or private relations.

All representatives, collaborators, suppliers, partners, service providers, and other third parties who interact directly or indirectly with **WEBCORE** must act with honesty, diligence, and alignment with the organization's ethical principles, safeguarding its reputation and fostering honest and transparent professional relationships.

# 10.1 Business Integrity, Prevention of Corruption, Money Laundering, and Illicit Activities

The use of **WEBCORE**'s structures, products, platforms, or services for illicit purposes is strictly prohibited, including the concealment, fragmentation, untraceable movement, or circulation of resources incompatible with legitimate economic activity. It is also forbidden to conceal, facilitate, or collaborate with operations of dubious origin or without proper documentation, as well as to use personal or third-party accounts to move funds related to **WEBCORE**'s business.

In interactions with public agents, state bodies, or governmental entities, **WEBCORE** maintains absolute rigor, ensuring that all institutional relationships are ethical, transparent, and legitimate, without any favoritism, interference, or undue influence. No action may be guided by personal, partisan, or ideological interests, nor generate a conflict of interest.

## 10.2 Business Integrity, Prevention of Corruption, Money Laundering, and Illicit Activities

All payments, receipts, and contracts must be made exclusively through the company's formal channels, with proper accounting and documentary traceability.

It is expressly forbidden for collaborators, representatives, suppliers, partners, service providers, or any third party related to **WEBCORE** to participate in, conceal, facilitate, or collaborate, directly or indirectly, with operations of dubious origin or that lack legitimate and transparent justification. In this context, the following is also prohibited: the splitting of payments or receipts for the purpose of concealing amounts or reducing traceability; the omission or manipulation of accounting or documentary records; the carrying out of transactions in the name of third parties or without proper documentation; as well as the use of personal accounts, third-party accounts, or any informal payment methods to move resources related to **WEBCORE's** activities.

## 10.3 Business Integrity, Prevention of Corruption, Money Laundering, and Illicit Activities

Such actions, besides violating this Code of Ethics and Conduct, may constitute serious legal offenses and subject the offender and the organization to civil, administrative, and criminal sanctions, under the terms of current legislation, especially the anti-money laundering regulations and the legal procedures applicable to harmful acts against Public Administration.

If any violation of the law, this Code, or the ethical principles that guide the company's actions is identified, **WEBCARE** may terminate commercial or institutional relationships at any time. Integrity is a non negotiable value and guides all professional connections established.

Anyone covered by this Code has a duty to report suspected irregularities related to bribery, fraud, money laundering, or conduct which is inconsistent with this Code. **WEBCARE** ensures protection for the good-faith whistleblower, preserving confidentiality and preventing retaliatory practices.

# 11. Fair Competition and Market Conduct

A **WEBCORE** values free competition and repudiates any practice that constitutes abuse of economic power, cartel formation, market manipulation, or anti-competitive conduct. All market relations must occur in compliance with Brazilian competition law, including, among other applicable regulations, the Competition Defense Law, the Consumer Defense Code, the Industrial Property and Copyright legislation, and other administrative, civil, and criminal rules related to the protection of the economic order.

It is the duty of all employees, partners, suppliers, and any third parties acting on behalf of or in the interest of **WEBCORE** to act with loyalty and respect for market rules, competing ethically, transparently, and based on the quality of the products, services, and solutions offered.

Behaviors such as the following are not tolerated: obtaining commercial information from competitors through illegitimate means; disseminating false, misleading, or defamatory data about companies, professionals, or products; price-fixing or other agreements concerning commercial conditions, customers, or areas of operation; engaging in industrial espionage, misappropriation of commercial secrets, or unauthorized use of intellectual property; copying, reproducing, decompiling, reverse-engineering, cloning, extracting, or using third-party or competitor software, code, algorithms, libraries, or other technological assets without authorization or a valid license; plagiarizing protected content, as well as any other fraudulent, illicit, or unethical conduct aimed at obtaining a competitive advantage.

# 11.1 Fair Competition and Market Conduct



The use of digital communication, advertising, platforms, and social networks must respect legislation, image rights, copyright, intellectual property, and the principles of advertising ethics.

Failure to comply with this clause may result in internal disciplinary measures and the adoption of appropriate legal procedures, without prejudice to civil, administrative, and criminal liability, in accordance with applicable legislation.

## 12. Privacy and Data Protection

**WEBCORE** understands that privacy is an essential right and that the responsible processing of personal data is a fundamental part of its ethical and transparent operation. Therefore, all data processed by the company, whether those of clients, employees, partners, or users of its platforms, are handled with security, confidentiality, and absolute respect for Brazilian legislation, especially Law No. 13.709/2018 (General Data Protection Law – LGPD) and Law No. 12.965/2014 (Civil Mark of the Internet).

The use, storage, and other operations of personal information processing by **WEBCORE** must always have legitimate, specific purposes, clearly linked to its professional, technological, and commercial activities. All treatment shall observe the principles of necessity, adequacy, purpose, transparency, security, prevention, and good faith, ensuring that no information is used in an abusive or discriminatory manner, or in a way that is incompatible with the rights of the data subjects.

**WEBCORE** adopts technical and administrative measures aimed at protecting personal data, seeking to prevent unauthorized access, use, disclosure, alteration, or sharing of information. In the event of suspicion or confirmation of a security incident involving personal data, the company shall take the necessary measures for control, investigation, and risk mitigation, and may report to the affected data subjects and, when applicable, the competent authorities.

# 12.1 Privacy and Data Protection

All collaborators, suppliers, partners, and any third parties who have access to personal data in the context of their activities with **WEBCORE** must handle it with care, confidentiality, and strict adherence to the organization's legislation and internal policies.

Sharing, transferring, assigning, or any form of disclosure of personal data is prohibited without a valid legal basis, the data subject's consent when required, or other legitimate justification that authorizes the processing.



## 13. Use of Resources, Assets, and Information Technology

The assets, equipment, systems, and facilities of **WEBCORE** must be used responsibly and exclusively for professional activities related to the company. These resources should not be used for personal purposes or purposes unrelated to the **WEBCORE**'s objectives.

Anyone who has access to company resources, whether employees, partners, suppliers, service providers, or authorized third parties, is responsible for ensuring the proper use, conservation, and security of these assets, immediately reporting any situation that may represent a risk, failure, or loss to **WEBCORE**.

Corporate emails and other technological tools must be used responsibly, professionally, and only with authorization. The use of personal addresses or those of other organizations to discuss matters related to the activities of **WEBCORE** and its Affiliates is forbidden.

Everyone must act with diligence to preserve the integrity of the company's systems and networks. It is forbidden to access, transfer, send, or store offensive, illegal, discriminatory content, or content that may compromise the security and proper functioning of technological tools.

## 13.1 Use of Resources, Assets, and Information Technology

Similarly, it is not allowed to install unauthorized software, applications, or devices, nor to make copies, transfers, or store information, documents, codes, files, or any corporate data from **WEBCORE** in personal emails, private devices, external media, or other environments without express authorization from the company, even if the goal is to carry out professional activities.

Everyone is responsible for ensuring the confidentiality and appropriate use of access credentials (logins, passwords, tokens, and other authentication methods), and it is forbidden to share them or allow their use by third parties.



# 14. Social Responsibility and Environmental Sustainability

**WEBCORE** absolutely repudiates any practice that violates human dignity, including the improper use of child labor, forced labor or labor analogous to slavery. This commitment extends to all our employees, clients, partners, and suppliers, who must adopt the same ethical and legal standards in their activities.

**WEBCORE** understands that respecting people is also taking care of the planet. Therefore, even though we are a digitally based company, we are committed to acting in an environmentally responsible manner, seeking to reduce waste, minimize impacts, and adopt sustainable practices in our daily operations. This includes the rational use of energy and resources, the correct disposal of waste, the preference for suppliers and solutions that adopt sustainability criteria, and the constant search for cleaner and more efficient technologies and processes.

We hope that everyone who relates to **WEBCORE** shares this same vision, acting with socio-environmental awareness and ethical commitment. We do not condone any predatory, discriminatory practices, or those that violate human rights, fauna, flora, or natural balance.

## 15. Communication of doubts, reports, and accusations.

**WEBCORE** provides institutional channels for receiving questions, reports, and accusations related to possible violations of this Code, internal policies, or current legislation, including the electronic address: [compliance@webcore.com.br](mailto:compliance@webcore.com.br).

All manifestations will be treated with seriousness, confidentiality, and respect, being analyzed by individuals designated by **WEBCORE**, who will take the necessary measures to investigate the facts and, when applicable, refer the matter to the competent instances of the Company.

**WEBCORE** does not allow any form of retaliation, punishment, or harm against employees, partners, or third parties who make good-faith reports, even if they are not subsequently confirmed.

The improper use of the latter communication channels through false, malicious, or bad-faith complaints, constitutes a serious ethical offense and may subject the author to applicable disciplinary or legal measures.

## 16. Accountability and Sanctions

Failure to comply with this Code or with **WEBCORE**'s internal policies and regulations may subject the offender to disciplinary measures, which may include warning, suspension, dismissal, or contract termination, depending on the severity of the offense and applicable legislation.

The application of penalties shall observe due process, ensuring the right to be heard and full defense, through an internal process conducted with impartiality and proportionality.

Where there are indications of any violation of applicable law, **WEBCORE** may report the facts to the competent authorities and fully cooperate with any investigations.

The sanctions presented in this section do not exclude any civil, labor, administrative, or criminal liabilities arising from the conduct in question, including in relation to harmed third parties.

# 17. Code Validity Period, Update, and Ethical Commitment

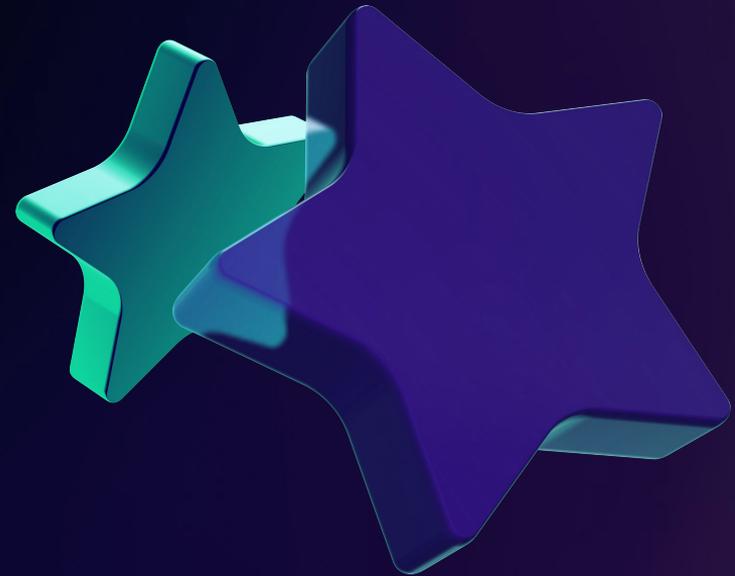
This Code comes into effect on the date of its approval by the **WEBCARE** Board of Directors, revoking previous versions.

This document will be periodically reviewed and updated by the department or people designated by **WEBCARE**, in order to reflect legal, organizational, and market changes.

All employees, managers, and third parties shall declare their awareness and formal commitment to the principles herein contained.

Adherence to the Code is an essential condition for performing any activities linked to **WEBCARE**.

Compliance with this Code is an individual and non-transferable responsibility of each person who acts with or on behalf of **WEBCARE**, directly or indirectly.





webcore

Webcore Board of Directors

2025-12-11