



CODE OF CONDUCT

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DOCUMENT CONTROL

CHANGE HISTORY

Version	Date	Modification
1.0	21/12/2021	Document creation
1.2	18/03/2022	Insertion of the Blip template into the document, standardization of nomenclature (replacing “Code of Ethics and Conduct” with “Code of Conduct”), adjustment for gender-neutral language (replacing “a Blip” with “Blip”), and update of the Integrity Committee’s email address (comite.integridade@take.net).
1.3	30/01/2025	Policy update with the new brand, visual identity, and new Blip values.

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1. CEO LETTER

Blip always relates based on principles that make up values such as ethics, trust, credibility, integrity and transparency. Based on our values, we have developed this Code of Ethics and Conduct that will guide all internal and external decisions of Blippers, service providers, suppliers, partners and customers.

Ethical conduct implies working with honesty and integrity, valuing a relationship of transparency, truth and trust between people, where everyone can be in a safe and respectful environment.

It is extremely important that the rules established here are known and practiced, as we seek to always be one step ahead and constantly learn, using the best practices and working our relations day by day so that they can be humane, healthy, respectful and transparent.

This Code will guide any situation in order to guarantee and strengthen our culture, in addition to enforcing what we believe is right and that contributes to our growth as persons and professionals. For this, the commitment of each person who interacts in Blip is necessary.

2. OUR VISION, PURPOSE AND VALUES

Vision: 100% of companies in the world will have an Intelligent Contact.

Purpose: One message can change the world. Blip was born to foster smarter interactions between brands and people. In a context where relationships between companies and consumers increasingly converge into messages, we provide complete solutions to help brands build lasting relationships and delightful experiences for their customers, keeping them one step ahead in the market.

Our Values: Blip is an ethical, honest, and transparent company that is built on trust in all its relationships, whether with its employees (“Blippers”), customers, partners, or society at large.

- **BLIP.HIGHER** – We dream big and are always one step ahead. Our desire to evolve drives us to seek innovative solutions with purpose, step out of our comfort zone, and turn well-founded ideas into reality.
- **BLIP.EXCELLENCE** – Excellence is our starting point. Every delivery is an opportunity to exceed expectations, learn, and

delight our clients. We are determined to achieve ever-greater results.

- **BLIP.EFFICIENT** - Our technical expertise allows us to make more efficient decisions. We translate complexity into simplicity for our clients, eliminating excess, prioritizing what matters, and getting straight to the point.
- **BLIP.OWNERSHIP** - We are proactive and have the autonomy to take on challenges. We take responsibility for our deliveries, fulfilling what we promise. Aligned with the whole, we analyze what is best for Blip.
- **BLIP.TEAM** - Our team is Blip! We build high-performance teams to work cooperatively, creating bridges to amplify results, recognizing and celebrating every achievement. We value "us" before "me."
- **BLIP.BE** - Blip is made by and for people — whether they are Blippers, customers, partners, or suppliers. Every interaction is an opportunity to communicate clearly, welcome different opinions, and show genuine care, creating empathetic and respectful connections.

3. OBJECTIVE

Blip's Code of Conduct ("Code of Conduct") shall work as a guide for our actions as Blippers and as members of the society in which we operate. It represents our commitment to always act ethically, transparently and respectfully in all our activities and to establish honest and sustainable relationships in accordance with the law and our values.

It is the responsibility of each Blipper to know and become familiar with this Code of Ethics and Conduct and with all other existing policies, also available for consultation on our official website and on Blip University.

4. SCOPE

The Code of Conduct applies and must be fully observed by the entire Blip community, regardless of the position or function held, including members of the Board, Executive Board and leadership, as well as

permanent employees, interns, apprentices or outsourced workers of Blip.

The Code of Conduct also applies to our partners, suppliers, representatives and any other natural or legal person that may represent us or act in behalf or interest of Blip.

5. GUIDELINES AND QUESTIONS

The rules of this Code of Conduct are not limited to what is set forth herein. On the contrary, they establish the general standards and principles to be observed during the daily life of the Blippers. Situations not provided for this Code of Conduct may arise. In these cases, always try to think about our values and question the correct posture to follow, in accordance with our principles of ethics, integrity, respect and transparency.

Do not pursue an action or conduct that you are not sure is in line with our values, this Code of Conduct or the law. In case of doubt, seek guidance from your manager or contact the Integrity Committee (email: comite.integridade@blip.ai).

If you become aware of or suspect improper or illegal conduct, you must report it immediately. You can do this directly to your manager, the Integrity Committee, but you can also use the whistleblowing channel called Ouvidor Digital (<https://canal.ouvidordigital.com.br/blip>), which is a secure and independent channel where you can make reports without identifying yourself. More information about the whistleblowing channel is described in Section 16 of this Code.

6. OUR GENERAL ETHICAL PRINCIPLES

- a) We adopt, in all our activities, a transparent, honest, loyal and respectful conduct.
- b) We defend the dignity, freedom and privacy of people and we repudiate any type of discrimination or prejudice.
- c) We do not tolerate any form of harassment, stalking or bullying.
- d) We promote an “open-door” culture, where all Blippers can feel free to voice their opinions, share ideas, expose frustrations or report practices they feel are wrong. We do not tolerate any type of retaliation against anyone acting in good faith.

- e) We comply with all laws and regulations applicable to our activities, wherever we operate. We interact with government agencies and authorities with respect and transparency.
- f) We care for the confidentiality, integrity and protection of all company information, which is strictly considered confidential, whether from Blip or our customers, partners or suppliers to which we have access in the performance of our activities.
- g) We do not use our position in Blip for our own benefit. We act with total transparency in any situation that may generate a perception of conflict between the performance of the professional activity and personal interests.
- h) We compete with our competitors fairly and within the rules of the game. We believe that free competition is the basis for achieving excellence.
- i) We believe in the constant search for sustainable development and seek to contribute to the society in which we live.
- j) We treat any violations of our ethical principles fairly, impartially and seriously.

7. RELATIONSHIP WITH THIRD PARTIES

Blip believes that the success of its business is not possible without maintaining a healthy relationship with the external public and with the third parties with whom we interact. These third parties include customers, users, partners, suppliers, service providers (internal and external), representatives, public authorities, competitors, among others.

Therefore, it is essential that Blippers always adopt an ethical and transparent posture when interacting with any third party. To this end, Blippers must carefully observe the following principles and practices. If in doubt, seek guidance from your manager or the Integrity Committee.

7.1 Relationship with Customers

- Every contact with our customers is an opportunity to surprise and delight. Our main objective is the satisfaction of our customers.
- Our relationship with customers is one of trust, honesty and transparency. Our service must always be guided by our values and principles.
- We seek a respectful and polite relationship. We serve customers without privileges or discrimination.

- We do not accept the offering of any undue advantages to persons related to clients in order to obtain business or other benefits for Blip.
- In addition to the quality of our services, we are also committed to keeping confidential all information to which we have access in the course of our activities.

7.2 Relationship with Partners, Suppliers and Service Providers

- We treat our partners and suppliers the same way we like to be treated: with respect, professionalism and seriousness.
- We are always impartial in the choice of any third parties that may work with us, selecting them carefully and based on technical and ethical precepts. We do not accept any type of undue favoritism or discrimination.
- We do not accept the offer by third parties (or acceptance by Blippers) of any advantages in order to obtain favors in contracts or other undue benefits with Blip.
- We expect Blippers to communicate to Blip (through the Integrity Committee), in a transparent manner, the existence of any actual or potential conflict of interest in their relationship with third parties.
- In the same way that we value integrity, our partners, suppliers and service providers must also observe our values and ethical principles.
- We maintain the confidentiality and integrity of the information entrusted to us and do not share confidential information owned by another party with third parties. We expect our partners, suppliers and service providers to treat Blip's confidential information in the same way, including following current legislation related to the protection of personal and sensitive data.

7.3 Relationship with Public Entities

- We value the maintenance of an ethical and transparent relationship with all government authorities and public bodies, observing and respecting all applicable laws and regulations.
- All communications with public authorities must be conducted with the highest level of accountability, integrity and transparency.
- We recognize the importance of the functions performed by government bodies and authorities. In this sense, we do not tolerate any conduct that may hinder investigation or inspection activities by public bodies, entities or agents, or interfere in their performance.

- Contracts with public entities, including public companies, mixed capital companies and public foundations, are subject to specific rules established by the public bidding and contracting laws. Such rules may be substantially different from those applicable to contracts with private sector clients.

7.4 Relationship with Competitors

- The relationship with our competitors, like all others, must be guided by honesty, integrity and transparency.
- Our performance must always respect all competition and antitrust laws. We compete fairly and equitably, but at the same time vigorously and without any kind of adjustment or combination. We make all our decisions independently, including on strategy, pricing, customers, markets, etc.
- In meetings with competitors, we must not discuss pricing policy, terms and conditions, confidential information, product design, financial planning, marketing strategies or future planning. Blippers must avoid any conduct that could result in or create the perception that there is a combination (express or implied) with competitors, including pricing, market division, customers or other factors.
- Blip rejects any form of unfair competition. We do not tolerate any practice that could result in the illegitimate acquisition of information about competitors, trade secrets or confidential information, including information that contains personal or sensitive data. We do not accept any practice that involves providing false, misleading or defamatory information about competitors or any third party.

7.5 Relationship with the Press

- Blip conquered and strengthened its space in the media through an image of integrity, excellence and transparency, and therefore it values its relationship with the press. This is also the role of each Blipper, taking care of the company's image.
- Public statements are made by the Press Office and must be previously aligned/approved by Marketing.
- The same care applies to social networks. It is not allowed to link Blip's name to inappropriate conduct, nor to disclose

confidential and sensitive information about the company, including, and especially, those relating to customers and strategic business partners.

8. CONFLICTS OF INTERESTS

It is common for our personal and professional lives to have some level of correlation and that is not wrong. In these cases, however, there are precautions to be taken to avoid conflicts of interest.

Conflicts of interest often arise when someone has family relationships, personal relationships, or other activities and interests that may cast doubt on their ability to perform their professional duties objectively, impartially and in the best interest of the company.

In this sense, some rules must be observed:

- Unless authorized by the Blip Integrity Committee, Blippers who are related or have a close relationship must not be subordinate (directly or indirectly) to each other. Approval will take into account, among other things, the extent to which a Blipper has supervisory, evaluation, management or control authority over their relative or close relationship.
- Unless authorized by the company's Integrity Committee, Blippers may not hold equity interest in Blip's partners, suppliers or service providers, nor may they exercise outside occupations that may interfere or conflict with the exercise of their functions or responsibilities at Blip, or which may represent any form of conflict with Blip's interests.

Conflict of interest situations may also arise in relationships with customers, competitors or public bodies acting in relation to Blip.

In order for Blip to adopt adequate measures to mitigate situations of conflict of interest, the Blippers must disclose to the Integrity Committee or to the People and Management area (i) if they have relatives or people with a close relationship who also work for Blip or who work/have an interest in partners, suppliers, service providers, customers, competitors or public bodies acting in relation to Blip; or (ii) if they have interests in other companies or other occupations outside of Blip.

The performance of Blippers as freelancers for Blip clients can only occur with the prior authorization of the Integrity Committee. Blipper's

performance as a freelancer cannot conflict with the performance of its activities for Blip, nor with working hours.

In any case of Blipper's professional performance outside of Blip (including situations of acting as a freelancer for Blip clients), Blipper may not use Blip's internal resources, assets or information.

9. ANTI-CORRUPTION

Blip is committed to operating with the highest standards of ethics and integrity in all of its businesses. This implies fully comply, among other legal regulations, the Anti-Corruption Law (Law No. 12,846/13), regulated by Decree No. 8,420/2015, as well as its subsequent amendments.

Violations of anti-corruption laws can expose Blip and the Blippers to serious consequences, including administrative, judicial, tax, labor and criminal penalties.

Blip strongly prohibits any Blipper or any third party acting on Blip's behalf, interest or benefit:

- Offer, promise or give (or authorize any other person to offer, promise or give), directly or indirectly, through any third party, any type of undue advantage to public agents (national or foreign) or any third parties related to them;
- Offer, promise or give (or authorize any other person to offer, promote or give), directly or indirectly, through any third party, any type of undue advantage to employees of private companies, or any third parties related thereto;
- Request, receive or accept an undue advantage, directly or indirectly, from any third party, for their own benefit or that of a related person, in order to influence the practice of any act in the performance of their duties for Blip.

For the purposes of this Code of Conduct, a public agent is considered to be:

- who, although temporarily or without remuneration, holds a public position, job or function;
- who exercise a position, job or function in state entities or legal entities directly or indirectly controlled by the government;

- who works for a service provider contracted or contracted for the execution of a typical activity of the Public Administration;
- candidates for public office; and
- officials from political parties, international public organizations and diplomatic representations.

The term “undue advantage” should be interpreted broadly, including tangible and intangible assets, such as (but not limited to): payments or donations; gifts or presents; tickets for shows and events; travel, airfare, accommodation or meals as defined in the Gifts Policy.

The prohibition expressed here also applies to any type of facilitation, acceleration or urgency payment (that is, payments that aim to speed up or expedite the practice of routine acts by public agents, such as the issuance of licenses, permits or authorizations).

10. GIFTS, PRESENTS, ENTERTAINMENT AND HOSPITALITY

The offering or acceptance of gifts, presents, entertainment and hospitality can be seen as an important part of normal business practices and good institutional or commercial relationships. However, the provision of such items may influence (or appear to influence) the decisions of public officials or the private sector. Likewise, its receipt by employees of Blip may affect the impartiality of decisions or create the appearance of a conflict of interest.

Special care must be taken in providing gifts, presents, entertainment and hospitality to government officials. Although there is no intention to unduly influence the conduct of public agents, such initiatives may generate liability for Blip, its managers and employees.

No Blipper – or representatives of Blip – may provide or offer any kind of present, gift, entertainment or hospitality to any third party, unless it observes all rules to be defined in a specific policy by Blip, including, as the case may be, obtaining prior internal authorization.

11. DONATIONS AND CONTRIBUTIONS

Blip understands that legitimate and legally authorized institutional donations and contributions are an important part of the company's activities. However, donations and contributions carry inherent risks and should be carefully assessed and approved.

No Blipper or third party may make any kind of donation or contribution, including of a philanthropic or political nature, on behalf of Blip.

Donations and contributions by Blip can only be made by the company itself and must observe the rules provided for in a specific policy. Rules may include prior verification of the beneficiary entity, procedures to confirm the absence of conflicts, declarations of legal compliance and prior approval requirements.

12. HARASSMENTS

Blip strongly repudiates the practice of harassment by its employees, whether in relation to another Blippers or any other person. A professional environment based on respect and cordiality is expected from everyone and is one of the most important principles that guide our activities.

12.1 Harassment

Moral harassment is characterized by any and all abusive conduct towards an individual or group of individuals. These conducts can be perceived by behaviors, words, acts, gestures and evaluations that can harm the personality, dignity or physical or psychological integrity of a person, and end up generating an intimidating, hostile, degrading and humiliating environment for those who are victims.

Moral harassment is usually more perceived in situations of direct hierarchy, but sometimes it is also possible to characterize harassment between employees of the same level or even from lower-level employees to the detriment of their superiors.

A distinction must be made between management and moral harassment. Management has interests linked to the company's strategy and is not to be confused with moral harassment. For example, feedbacks and evaluations, collection for results and goals, area transferring and coordination of daily activities are inherent to management. However, the actions inherent to effective management must always be guided by respect and transparency, and never by humiliation.

12.2 Sexual Harassment

Sexual harassment is characterized by unwanted conduct, constant and non-consensual insinuations, or inappropriate and sexual actions that generate embarrassment for those who receive them.

Any comment, gesture, message, blackmail, insinuation or pressure of a sexual nature may constitute sexual harassment, especially if they are not consented by the victim and if such acts may cause embarrassment.

Blip rejects and does not tolerate any acts of harassment. Any employee who practices or contributes to this practice will be subject to disciplinary action.

13. DIVERSITY

We believe it is Blip's duty to provide a safe environment for everyone. That's why we cultivate a culture that encourages respect, individuality, autonomy and collaboration.

Thus, we promote inclusion and appreciation of diversity, where everyone, without exception, feels comfortable to be who they are; free from social, racial, belief, gender, sexual orientation, age, nationality, among other kinds of discrimination.

It is essential that everyone feels comfortable in the work environment and, for that, we need to respect some rules of conduct and personal posture. This reflects the way we relate to each other and how we practice Blip's values. We carry the company name and it is important that we are committed to its values and culture.

Blip strongly repudiates and does not tolerate any form of discrimination or prejudice against anyone, whether within the company or with third parties.

14. ENVIRONMENT, SAFETY AND HEALTH

Blip recognizes the importance of protecting and conserving the environment, which is a responsibility of all of us. Our commitment in this regard must be shared by all Blippers, whether working in the company or in their personal lives.

Even though our operations do not have a direct impact on the environment, we work to preserve it and believe in our ongoing responsibility, defending it in all the forums in which we operate.

We also take all necessary actions to preserve the safety and health of our employees, whether physical or mental. In this sense, the maintenance of mental health is extremely important not only for the performance of activities at Blip but, mainly, for the quality of life of all Blippers.

We work consistently to promote an environment of results, but, at the same time, light and comfortable, always thinking about the well-being of our employees, our greatest asset.

15. USES OF INFORMATION AND ASSETS

Blip, always observing the legal limits, may access confidential information from its customers and partners, understanding the responsibility associated with the maintenance of this information. In addition, Blip also works in the development of tools and solutions endowed with high-value intellectual property.

Blip prohibits the unauthorized disclosure or use of sensitive and confidential information, especially those with personal and sensitive data, held by the company or its customers/partners, including use for personal benefit or that of third parties.

Unauthorized use of company assets, including, but not limited to, company hardware, software, facilities and objects, materials, financial assets, intellectual property and company branding is also prohibited.

The assets made available to the Blippers for the performance of their activities must be used with due care and concern, avoiding losses and damages.

All content contained or trafficked on equipment and corporate accounts is the property of Blip, and Blippers and third parties are expressly prohibited from reproducing/copying any of the company's content, including, but not limited to, customer data, studies, opinions techniques and codes, for any personal and/or private purpose. For this reason, all tools used by Blipper in its work may be monitored by the company at its sole discretion. Therefore, Blippers should have no expectation of privacy when using Blip's equipment, systems or networks.

Likewise, Blip is not responsible for the integrity, availability and confidentiality of private data unrelated to work activities, and which may be stored on equipment or corporate accounts.

This also applies to BYOD devices. The term BYOD means “Bring Your Own Device” and is associated with the practice of using, for the work performed for Blip, any equipment owned by Blipper, including: smartphones, tablets, notebooks, desktops, flash drives, among others. BYOD can only be used with the permission of the responsible area, as well as with the formal approval of the immediate manager, in cases where the equipment provided by Blip is not sufficient to carry out the activities of Blipper, in addition to following the measures and good practices contained in Blip’s Information Security Policy.

It is not allowed to share or store confidential, restricted or internal information, for example source code of programs, strategic information from Blip, personal and sensitive data of employees, customers, among others. Furthermore, Blipper acknowledges that information related to the performance of its functions for Blip, even if stored on a personal computer, belongs to Blip and may be monitored and requested by the company, without any expectation of privacy in relation to them.

Blipper also acknowledges that Blip is not responsible for any damage to personal equipment when it is in use during the performance of work activities, nor will it support non-corporate applications, such as standard device applications and software. acquired by Blipper.

It is strictly prohibited to share passwords for equipment and/or systems of Blip or customers/partners.

Never copy, reproduce, transmit, distribute or use without authorization, documents, files, models, methodologies, formulas, research, projects, projections, analyzes and reports produced in the performance of the company’s activities. The guidelines established in this Code of Conduct apply regardless of the means or form in which the information is stored, accessed, produced or transmitted by Blip.

The use of information and assets must always follow and be in accordance with the guidelines provided for in Blip’s Information Security Policy.

All information developed (technologies, methodologies, brands, tutorials, videos and others) by employees or service providers, in the exercise of their

functions, are the exclusive property of Blip and their creators do not have any form of copyright, except the author's moral right, in accordance with the relevant legislation.

16. WHISTLEBLOWING CHANNEL

Cases of suspected or known violations of the Code of Conduct or applicable legislation must be reported promptly.

You can do this directly to your manager or the Integrity Committee, but you can also use the Digital Ombudsman, a secure and independent channel, available both to Blippers and to third parties, where you can, if you prefer, make reports without identifying yourself.

The Digital Ombudsman can be accessed online at the following address:

- <https://canal.ouvidordigital.com.br/blip>

Blip does not tolerate any form of retaliation against anyone for reporting, in good faith, violations or suspected violations of the Code of Conduct or applicable law.

Complaints are treated confidentially and, after investigation of the conduct, will be submitted to the Integrity Committee for evaluation and definition of disciplinary measures or other measures applicable to each case.

17. DISCIPLINARY MEASURES

Blip believes in serious, effective and appropriate accountability to Blippers who violate the values, principles and standards of this Code of Ethics and Conduct.

Violation of any term or condition of this Code of Conduct or legislation will subject the violator to disciplinary measures provided for in applicable law, including termination of the employee or termination of the contract with partners, suppliers or service providers, without prejudice to the adoption of other applicable legal measures.

18. REFERENCES

- PO.SEG.1 - Política de Segurança da Informação (Information Security Policy)
https://drive.google.com/file/d/1MqSVq_hQP0A_KINfit91LZiS9T_CJDmHS/view?usp=sharing