

CODE OF ETHICS AND CONDUCT

TTY

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1.Introduction

TTY is a company operating in the information technology sector, aiming for growth based on ethical principles and the satisfaction of its clients and related institutions. It continuously strives to maintain a solid reputation, with an awareness of its social and environmental responsibility. Its activities must always be guided by integrity, trust, and loyalty, as well as by respect and appreciation for the human being, their privacy, individuality, and dignity, without any prejudice or forms of discrimination.

2.Purpose

This Code of Ethics and Conduct was developed to provide clear guidance on behaviors, practices, and standards that all employees and partners must follow to ensure compliance with the company's laws, regulations, and values, addressing issues related to:

- Compliance with workplace conduct rules, regardless of hierarchy, department, or job function;
- Transparency in operations in general;
- Safety in the activities performed by involved professionals;
- Protection and confidentiality of information that must remain secure;
- Regulation and improvement of relationships (executives, partners, suppliers, clients, partners, the community, unions, society, and other stakeholders);
- Maintenance of a respectful, fair, safe, productive, and inclusive work environment for all.

3.Scope

The CODE OF ETHICS AND CONDUCT outlines behavioral guidelines based on ethical and moral standards that serve as a reference for the conduct of all employees, both internal and external. Its application extends to all members of TTY's workforce in the performance of their duties, including service providers, suppliers, and business partners associated with the company.

4.Disclosure

This CODE OF ETHICS AND CONDUCT will be publicly available on the company's website at <http://www.tty2000.com.br> for employees to consult at any time. It is the responsibility of the Company's Legal Representative to:

- Ensure compliance with this CODE OF ETHICS AND CONDUCT;
- Inform new employees about the CODE OF ETHICS AND CONDUCT and keep records of their acknowledgment and agreement;

- Promote wide dissemination of the CODE OF ETHICS AND CONDUCT and its updates to the company's staff, clients, service providers, and suppliers;
- Clarify doubts and verify understanding regarding the content and its application.

5.Values

- Respect for people
- Social responsibility and citizenship
- Professional and personal integrity
- Transparency in processes
- Pride in working at TTY
- Gender and racial equity
- Commitment to results
- Technical competence
- Trust and credibility
- Confidentiality and information security
- Innovation focused on advanced technological solutions
- Compliance with current laws and regulations

6.Ethical Principles

The executives and employees of TTY base their actions on the following principles in their relationships with various sectors of society:

To Clients

- Professionalism, trust, and transparency
- Availability of solutions that add value to clients' businesses, with continuous investment in appropriate technologies and improvement of business strategies
- Appreciation for and respect of agreements and contracts, as well as clients' rights
- Valuing business opportunities and partnerships built with clients, aiming for results that benefit society
- Identification, proposal, and implementation of innovative and integrated solutions that strengthen the legitimacy and sustainability of clients

To People

- Maintaining a work environment where relationships are based on professionalism, trust, cooperation, integration, respect for individual differences, and civility;
- Sharing knowledge and experience, aiming to improve technical skills, methods, and processes in order to achieve better overall results for the Company;
- Valuing people by contributing to their personal, technical, and professional development through training sessions, lectures, courses, and by encouraging and funding employee certifications;

- Ongoing diligence in the proper and economical use of the Company's material, technical, and financial resources;
- Preserving and respecting the Company's image, assets, and interests;
- Recognizing and valuing the Company's intellectual capital and encouraging the emergence of new leadership;
- Promoting and encouraging ethical conduct, both individually and collectively.

To Suppliers and Contractors

- Legality, impartiality, morality, transparency, and efficiency in all actions taken;
- Maintaining relationships based on mutual respect, and the preservation and confidentiality of information related to TTY and its clients;
- Engagement with suppliers and partners whose practices align with the ethical standards adopted by TTY and with social morality;
- Establishment of partnerships provided that the image and interests of TTY are preserved;
- Rejection of contractual provisions that offend or undermine the dignity, quality of life, and social well-being of outsourced workers;
- TTY respects the Universal Declaration of Human Rights. It does not engage in forced labor, child labor, or degrading working conditions, and does not maintain relationships with companies or individuals who violate this conduct.

To Employee Representation

- Respect for free association and recognition of the legitimacy and ongoing dialogue with legally established worker representative institutions, maintaining communication channels based on mutual respect, seriousness, responsibility, and transparency in relationships;
- Negotiation as an appropriate instrument to seek integration and convergence;
- Compliance with the provisions set forth in the instruments that regulate the relationship between the Company and its employees.

To the Government

- Recognition of the role and support for the activities of regulatory bodies, providing them with relevant and reliable information in a timely manner. The Company does not tolerate any form of granting advantages and/or privileges to public officials due to their position.

To the Community

- Establishment of fair and balanced relationships with the community through encouragement, promotion, support, and participation in social responsibility and citizenship initiatives;

- Encouragement, support, and participation in government actions aimed at social development, poverty alleviation, and environmental preservation;
- Promotion of sociocultural and sports initiatives involving its employees.

7.Expected Behaviors and Conduct of TTY Employees

TTY's leaders and employees must safeguard the integrity, reputation, and proper functioning of the company. They are expected to adopt the following conduct:

7.1.Conduct: Professional and Ethical

- Act with loyalty, fairness, clarity, and honesty in work relationships;
- Preserve and cultivate the positive image of TTY;
- Prioritize and defend the interests of the company in all actions and external relations;
- Not use one's position, role, or influence to obtain personal advantages or benefits for third parties;
- Present oneself appropriately according to the corporate environment and the duties performed;
- Follow the company's strategic guidelines when assuming trusted roles. In case of disagreement, the employee must resign from the position;
- Not provide false or distorted information regarding the company's financial, operational, or strategic data;
- Always be accompanied by another employee when conducting negotiations with suppliers/partners that may involve contracts.

7.2.Interpersonal Relationships and Organizational Climate

- Contribute to a productive, respectful, and collaborative work environment;
- Treat colleagues, clients, and partners with dignity, respect, and empathy;
- Preserve collective well-being by respecting opinions, personal characteristics, and privacy;
- Reject any form of harassment, intimidation, or discrimination based on race, color, ethnicity, gender, age, religion, origin, physical or mental condition, political or social status;
- Do not tolerate acts of physical, verbal, or psychological violence.

7.3.Responsible Use of Company Resources

- Use TTY equipment, software, hardware, and accesses exclusively for professional purposes;
- Take care to conserve corporate resources;
- Do not use electronic means (email, phone, Teams, etc.) to send or receive inappropriate or non-work-related content;
- Sell products or services only if they are owned by and of interest to TTY.

7.4.Information Security and Confidentiality

- Keep internal and client passwords and accesses secure, individual, and non-transferable;
- Ensure confidential documents and emails are protected and properly delivered to the intended recipients;
- Be attentive to the circulation of sensitive information, avoiding undue exposure.

7.5.Health, Safety, and Well-being

- Preserve health and safety in the workplace, following guidelines on ergonomics, well-being, and care for physical and mental health;
- It is prohibited to consume or be under the influence of alcohol or illicit drugs during working hours;
- Respect internal rules regarding working hours, use of PPE (when applicable), and maintaining a safe environment.

7.6.Commitment to Working Hours and Responsibilities

- Record daily attendance (when applicable) and notify the immediate supervisor and HR department about delays or absences;
- Submit medical certificates or declarations when necessary;
- Work overtime only with manager authorization and in cases of real need;
- Be available on Teams during working hours, even if in contact with clients through other channels.

7.7.Relationship with Third Parties

- Refuse gifts, presents, or benefits from individuals or companies with commercial ties to TTY exceeding R\$ 150.00;
- Act with transparency in relationships with clients, suppliers, financial institutions, and public bodies, always prioritizing the company's interests.

7.8.Responsibilities Regarding Personal and Corporate Information

- Keep contact data updated with the HR department;
- Preserve the confidentiality of internal, client, and partner information;
- Fully comply with internal policies, the Code of Ethical Conduct Manual, and applicable legislation.

8.Unacceptable Conduct by TTY Employees

TTY repudiates any behavior that contradicts its values, internal guidelines, and applicable law. The behaviors below are considered unacceptable and subject to disciplinary measures, according to the severity of each situation:

8.1. Unethical or Illegal Conduct

- Claiming, requesting, or accepting gifts, advantages, or benefits for oneself or third parties due to one's position or TTY's commercial relationships;
- Obtaining any advantage based on privileged information or exclusive access to company data;
- Using one's function or position to gain undue favors or personal privileges;
- Publicly representing TTY without formal authorization or competence;
- Being complicit, negligent, or obstructive in the investigation of errors, irregularities, or violations of internal rules and laws;
- Altering, distorting, or falsifying documents, data, or information under the company's or third parties' responsibility;
- Facilitating or allowing third-party actions that may harm TTY.

8.2. Conflicts of Interest and Professional Misconduct

- Prioritizing personal or third-party interests (clients, suppliers, partners, etc.) over TTY's interests;
- Engaging in external activities during working hours or that directly or indirectly compete with the company's activities;
- Allowing personal interests, sympathies, or antipathies to influence professional decisions and relationships;
- Remaining in a trusted position when not aligned with TTY's guidelines and strategies;
- Creating confusion between company assets and personal assets, even without immediate financial loss.

8.3. Disrespect towards People or the Work Environment

- Discriminating against individuals for any reason, including social class, religion, race, color, gender, political orientation, disability, or origin;
- Practicing or tolerating harassment, persecution, intimidation, or hostility of any kind;
- Intentionally harming the reputation of colleagues, clients, suppliers, public bodies, or any other company partner;
- Allowing or contributing to a hostile, disrespectful work environment that compromises collective well-being.

8.4. Misuse of Resources and Information

- Improper, undue, or uneconomical use of TTY's financial, technical, or material resources;
- Using or passing on products, documents, tools, methodologies, or information owned by TTY or its clients/suppliers for personal or third-party benefit, unless legally or judicially required;
- Performing acts that disrupt, obstruct, or harm the proper functioning of the company's operations.

9. Compliance with the CODE OF ETHICS AND CONDUCT

In case of doubts about the correct conduct to adopt, the employee should seek help sincerely and transparently.

Any situation that may characterize a conflict of interest, harm the company, or contradict this Manual's principles must be reported immediately and formally to the Company's Legal Representative.

The Company guarantees confidentiality in handling these matters and commits to investigating reported cases.

Conflicting situations with the Code of Professional Conduct or those not foreseen herein may arise unexpectedly and will be handled case by case. Please consult HR or your immediate supervisor.

This CODE OF ETHICS AND CONDUCT reflects TTY's values and culture. Compliance reveals our commitment to professionalism and transparency in all work actions.

Disrespecting this Manual may subject employees to disciplinary actions, including dismissal for cause and legal proceedings.

Everyone directly or indirectly related to TTY must know and ensure compliance with this Manual, with the same ethical commitments regardless of their position.

Failure to observe any practices and procedures described here may affect TTY's institutional image credibility before clients, market, supervisory and regulatory bodies, government, and society in general.

This Manual takes effect as of its publication date.