



An Aligned Data Centers Company

CODE OF CONDUCT AND ANTI-CORRUPTION

UNIDADE: ALL UNITS

LOCAL: ALL LOCATIONS

Dear,

Unrestricted compliance with this principle is of fundamental importance to our image and reputation, and therefore to our business as a whole.

We expect everyone to follow these rules, as well as any specific rules and procedures applicable to our business. In addition, everyone must make sure that the members who work under this supervision know these rules, and guide Associates to follow them.

ODATA has, among its principles, the conduction of business in a responsible and ethical way, whether of the business of our institution as of the personal business of its members. This principle is adopted daily, and we can perceive it in the demonstration of common sense and in the application of high ethical standards in our work, in the fulfillment of the norms that regulate our business and in the observance of the rules applicable to our activities, as well as any third parties involved in ODATA's business.

If you have questions about a rule or its application, talk to your supervisor, the Legal Department, or the *Compliance Officer*.

The violation of any rule, law, or regulation must be immediately reported, either through the Ethics Channel, to the *Compliance Officer*, the members of the Ethics Committee, the Human Resources Department, and/or the Legal Department.

This Code of Conduct establishes the policies and practices of ODATA regarding how we conduct our business, being applicable to the relationship with Associates, Suppliers, Business Partners, Customers and any third party that conducts business with ODATA, establishing a clear expectation of the standards that should be followed.

The purpose of this Code is to help guide the conduct of all those indicated by the previous paragraph in various circumstances. However, no compendium of rules is able to foresee every situation. Perception is important and so it is crucial that everyone makes sure that no one observing our actions has a reason to believe that even the slightest unethical conduct is possible, is implied, or can be condoned by ODATA.

It is important to realize that you, as an Associate, are part of the team that makes up our Company and, therefore, are a mirror to others. In this way, we hope that you are proud to work at ODATA and that you reflect our image in the market in the most professional and ethical way possible. On the other hand, it is our role to continue to maintain a healthy, pleasant working environment guided by respect and professionalism with all our colleagues, Customers and Suppliers, and therefore this Code must be fully observed.

We ask that you follow this Code at all times and emphasize that it will provide you with guidelines that are not exhaustive, so your common sense should guide you in cases where it is omitted. When in doubt, always choose to alert one of the communication channels of ODATA about any conduct, yours or your colleagues, that may compromise our image.



Ricardo Alário Arantes
CEO

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APPROVAL, REVIEW AND APPLICATION

This Code was approved by the Executive Board of ODATA Brazil and by its Board of Directors. It is up to the Board of Directors/Executive Board/Governing Committee/Assembly of Shareholders of each country to ratify the decision of the Board of Directors of ODATA Brazil.

This Code revokes the previous version, and may also be revised, changed, and replaced at any time.

ODATA reserves the right to modify and review any current policies and standards without prior notice and without necessarily making changes to the Code.

Its application involves all levels of ODATA, regardless of their position or function, and should, therefore, be observed by all Associates, including administrators (directors and advisors), employees, trainees and interns.

Everyone must work together to ensure that ODATA's values and mission are known and serve as a guide to action for our entire team. The rules of this Code also apply to all third parties who have any relationship with ODATA or represent it in any way, including but not limited to suppliers and consultants.

VISION, MISSION, AND VALUES

VISION

To be a reference in the data center market in Brazil and other Latin American countries.

MISSION

To provide excellent data center infrastructure services, with high availability, reliability, and efficiency, using the best professionals, processes, and technologies in order to support the sustainable development of our customers' business.

VALUES

- Generating value for customers and shareholders:
To create value for our customers and shareholders by offering innovative, quality, and competitive services.
- Ethical, transparent, and participative management:
Stimulate the participation of the Associates in our management, in an ethical and transparent way. These are essential values for building solid, lasting relationships.
- Valuing the team and the work environment:
To contribute to the professional growth of our employees and promote a good work environment, based on professionalism, commitment, merit, and respect.
- Entrepreneurship:
Encourage and recognize innovative attitudes and initiatives that enhance the result of ODATA and its customers.
- Sustainability and social responsibility:
Optimize the use of natural resources in the development of our activities and promote social action practices in order to balance our interests with those of society.

INTERNAL RELATIONSHIP

ODATA intends to develop and maintain a pleasant and healthy work environment for the welfare and productivity of its Associates. Therefore, we direct the Company member to:

- Perform their activities in compliance with this Code and other ODATA guidelines and policies;
- Behave professionally, loyally, with integrity and honesty towards the Company's other Associates, regardless of hierarchical position, job, or function;
- Work responsibly, transparently, and cooperatively, keeping your immediate superiors informed about your activities;
- Do not perform or encourage the practice of discrimination of any kind, whether by ethnicity, origin, age, religion, sexual orientation, disability, or any other;
- Abstain entirely from coercing, intimidating, or harassing, either morally or sexually, any other co-worker; remember that an eventual report of Harassment can bring serious legal consequences for the employee and for ODATA;
- Avoid situations that may imply in conflict of personal and professional interests; never accept any kind of business with our Suppliers or customers without first having informed and expressly obtained the consent of ODATA's Management;
- Do not practice and do not support the practice of gambling on ODATA premises. If the practice is outside the ODATA facilities, it should never have any relation with the ODATA brand. ODATA will not be responsible for any losses and damages suffered by its Associates in the practice of such acts, without prejudice of the Associate being under the risk of application of possible penalties;
- Do not allow and do not practice other types of professional activities (purchase and sale of products or services) in the premises of ODATA, during, before or after the hours established for fulfillment of their responsibilities, under penalty of application of the applicable penalties. ODATA will not be responsible for any losses and damages suffered by its Associates in the practice of said acts;
- Do not hire or induce the hiring of relatives or any person with whom you have a personal relationship, whether as an employee or service provider, without prior authorization from the Management;
- Respect the privacy of the other ODATA Associates, refraining from disclosing any information and/or image without their consent; do not make jokes or insinuations about your colleagues that may be interpreted in a negative way;
- Do not allow or make allow any kind of commercial, religious, or political propaganda in the premises of ODATA; do not get involved in discussions of this kind, because each person has his or her point of view, which must be respected;
- Be faithful to the information transmitted to your superiors, whether verbal or written, not concealing any facts, occurrences, problems, or data of which he/she is aware;
- Commit to the preservation of the environment and encourage sustainable development, avoiding the waste of materials, water, and electricity;

- Make strictly professional use of the materials and equipment owned by ODATA, made available to the Associates for the execution of their work.

In general, treat all your co-workers as you would like to be treated and, in this way, you will contribute to an environment that is always respectful and pleasant for everyone.

INTERPERSONAL RELATIONSHIPS:

In order to prevent situations involving conflicts of interest, that is, situations in which the Associate uses his/her influence or commits acts in order to achieve private interests, which may oppose the interests of ODATA or, even, which may cause damage or harm to ODATA, and aiming at transparency between ODATA and its Associates, personal relationships (including, but not limited to, spouses, partners, parents, siblings, cousins) , etc.) between (i) ODATA's Associates, and/or (ii) Associates and external persons, who have some connection with ODATA.

For the purposes of this Code, it shall be understood as external parties who have ties with ODATA all those persons who provide service or supply goods to ODATA.

The knowledge, by ODATA, of the existence of relationships in the characteristics described above is not intended to discriminate or harm such Associates, but to preserve transparency and fairness in the process of analysis and decision-making to select suppliers, new Associates and business partners, as well as to avoid obtaining individual benefits with the use of ODATA's name.

The existence of interpersonal relationship shall be informed (i) to the Human Resources Area, during the selection and hiring process; and (ii) to Compliance, at any time, if the person is already an ODATA Associate. The Human Resources Area or Compliance, as applicable, shall also be informed of the existence of interpersonal relationships with people working at companies competing with ODATA. Any questions about situations that may characterize conflict of interest should be clarified with ODATA's Compliance.

As a general rule, there is no restriction on the existence of interpersonal relationships. However, at ODATA's discretion, new Associates may not be hired who are spouses, partners, parents or siblings of any ODATA Associate and it will not be allowed (i) the maintenance, in the same area, of Associates (as) who maintain interpersonal relationships; (ii) direct or matrix subordination between Associates who have interpersonal relationships, or in any other position that entails a conflict of interest in decision-making related to ODATA's interests; (iii) carrying out external activities in organizations with interests conflicting with those of ODATA, such as providing consultancy or occupying functional positions; and (iv) the maintenance of own links, or through third parties, with suppliers or competitors of ODATA, if the position held by the Associate gives him or her the power to influence transactions or allow access to privileged information.

REPUDIATION OF CHILD LABOR AND LABOR ANALOGOUS TO SLAVERY

According to current legislation, art. 7, item XXXIII, of the Federal Constitution and art. 403 of the CLT, 16 is the limit age for work, except when exercised as an apprentice, which is allowed from the age of 14. In other countries where ODATA performs its activities, the minimum age is 18 years old, except teenagers with official authorization to work or who have technical or technological formation issued by a competent authority, in these cases they are authorized to work from 15 years old. The following limits must always be respected:

- Not to be submitted to unhealthy activities, with noises, chemicals, vibrations, bacteria and viruses;
- Not to be submitted to dangerous activities, that is, with contact with explosive substances, fuels, or electrical energy;
- Not to be submitted to night work, which is the work between 10 pm of one day and 5 am the next day;
- Do not work in places or services that will harm your psychological, moral, and social development;
- Do not perform functions that generate overtime except for a duly proven emergency; and
- They can only be hired to do light work that does not harm their health.

That being said, ODATA does not hire people under 18, unless under conditions authorized by law, does not use any form of forced labor or analogous to slavery and repudiates any organization that uses these practices.

Article 149 of the Brazilian Penal Code, and art. 367-B of the Colombian Penal Code frame the crime of reduction to slave-like conditions. In accordance with Colombian regulations, article 17 of the Political Constitution prohibits slavery, servitude, and treats human beings in all their forms.

ODATA obligates its Associates and Third Parties to inform the immediate superior or the Management about the existence of child labor or analogous to slave labor in any organization with which the company is related, so that the appropriate measures can be taken.

ODATA DOES NOT HIRE OR MAINTAIN ANY FORM OF PROFESSIONAL RELATIONSHIP WITH ANY ORGANIZATION THAT USES, HAS USED OR IS SUSPECTED OF USING CHILD LABOR AND LABOR ANALOGOUS TO SLAVERY.

SECURITY

ODATA cares for the physical and moral integrity of its Associates and Third Parties when applicable, being all oriented to:

- Correctly and mandatorily use the Individual Protection Equipment (IPE) required by law for the exercise of their activities, promptly informing their immediate superior of the absence or inadequacy of any such equipment;
- Observe all the instructions for use contained in machines, devices and equipment that may be used, as well as the rules and guidelines contained in other norms and internal policies of ODATA, requesting



clarification to the technical responsible for the instructions or IT support, if applicable, or his/her immediate superior in case of doubts;

- Do not carry or consume weapons, alcoholic beverages, or illicit drugs on the Company's internal premises or during working hours;
- Respect signs, banners, notices, luminous signs in the internal premises of the Company, as well as all the recommendations and trainings established in the ODATA premises;
- On the premises of ODATA, the Rules of Access and Conduct must be obeyed.

FIGHT AGAINST CORRUPTION

ODATA, its Associates and Third Parties involved are committed to conduct business in a legal, ethical, transparent, equitable way, always with accountability and corporate responsibility. These are the guidelines the Company must adopt in conducting its business and in complying with anti-corruption laws. The guidelines and rules defined in the policies and internal rules of ODATA should also be observed.

ODATA undertakes to strictly comply with the requirements of Law No. 12.846/13 (Brazilian Anticorruption Law) and other applicable rules and that aim to prevent and combat bribery and corruption in the countries where it operates, including, but not limited to the Foreign Corrupt Practices Act (FCPA), Law No. 9.613/98 (Law of Money Laundering), besides the norms that aim at the prevention and repression of money laundering, such as the Vienna Convention, of 1988; the Palermo Convention, of 2000; and the Mérida Convention, of 2006.

ODATA does not tolerate any form of corruption, whether against national or foreign public administration, as well as Suppliers, customers, or other partners.

WHAT IS IT:

Generally speaking, corruption is offering, promising, giving, or receiving, directly or indirectly, something to or from someone with the aim of persuading or influencing someone's decision making in order to obtain an improper advantage.

The good offered, received, or promised may have economic value, but it does not necessarily have to be money. It can be in the form of gifts, courtesies, or hospitalities (concerts, games, trips, upgraded airline tickets, sponsorship, and hiring relatives or friends).

The "undue advantage", in turn, is every event, with economic value or not, that would not have occurred were it not for the offer or promise of "something", such as, for example, with economic value the conclusion of a contract, the removal or waiving of penalties. Examples of events without economic value are access to confidential and privileged information or obtaining a favorable decision due to influencing a person to act in violation of his or her obligations.

The mere promise already characterizes corruption.

Besides being forbidden acts of corruption, the following actions, considered harmful to the Public Administration, are also not allowed:

- a) To frustrate or defraud, by means of an adjustment, combination or any other means, the competitive nature of a public bidding procedure;
- b) To prevent, disturb or defraud the performance of any act of public bidding procedure;

- c) To drive away or to seek to drive away a bidder fraudulently or by offering an undue advantage;
- d) Fraud bidding, public contract, or any related act;
- e) To create, fraudulently or irregularly, a legal entity to participate in a public bidding process or enter into an administrative contract;
- f) To obtain undue advantage or benefit, fraudulently, from modifications or extensions of contracts executed with the Public Administration, without authorization by law, in the call for tenders or in the respective contractual instruments; or
- g) To manipulate or defraud the economic-financial balance of contracts with the Public Administration;
- h) To hinder the investigation or inspection activity of agencies, entities, or Public Agents.

It is also forbidden by this Code, to hire Suppliers or Customers in situations of conflict of interest, i.e., when there is favoritism of third parties due to individual interests of the ODATA associate in charge of the hiring decision.

WHO IS LIABLE TO CORRUPTION:

Not only Public Agents are liable to corruption, but also people working in the private sector. For the purposes of this Code, the definition of Public Agent or Civil Servant extends to spouses, parents, children, brothers and sisters, parents-in-law, brothers and sisters-in-law, sons, and daughters-in-law of these.

Corruption can present itself either directly or indirectly. For example, offering or promising something to a relative of the public or private agent.

For clarification, public administration comprises all organs and agents of the municipal, state, and federal spheres, public companies, autarchies, as well as foreign public administration.

ODATA DOES NOT TOLERATE ANY FORM OF CORRUPTION.

INTERACTION WITH THE PUBLIC POWER:

ODATA establishes a list of good practices that should be adopted in interactions with public administration bodies, public companies and with public agents, such as:

- a) Any meeting with public agents must count with the presence of at least two Associates, and be scheduled or have its invitation forwarded to the e-mail governo@odata.com.br. Preferably, meetings should be held at ODATA's offices or at the offices of public entities or agencies;
- b) After the meeting, a record should be kept of its occurrence and the topics discussed, preferably with minutes that contain the topics discussed and the members present. Said record must be sent to the e-mail address governo@odata.com.br;
- c) Records in digital calendars must have a backup, to protect the information about the meeting occurrence, and must be forwarded to the e-mail address governo@odata.com.br;

- d) When meetings are held with agencies and entities of the direct federal, autonomous, and foundational public administration, the use of the Electronic System for Agendas of the Federal Executive Branch (E-Agendas) will be mandatory for registering and disclosing the agents' public commitments;
- e) E-mail messages must have clear and objective content and must be addressed to at least two public agents and two associates;
- f) Appropriate language must be observed in phone calls and, when strategic issues are dealt with, it is recommended that the content of the conversation is also registered in an e-mail;

COLLABORATION WITH THE PUBLIC POWER:

Hindering investigation activities, inspection of public bodies, entities or agents, or intervening in their performance is considered corruption, therefore, in the event of investigations carried out by Public Power bodies, related to possible involvement in corruption or suspected corruption by ODATA or its commercial partners, suppliers and customers, Administrators, Associates and/or third parties acting on behalf of ODATA must collaborate with said investigations, performing their best efforts in order to assist the authorities in a legal and honest manner.

GIFTS, COURTESIES, DONATIONS, AND SPONSORSHIPS:

Any type of meal, gift, courtesy, present, travel and entertainment, offered or received, must meet the internal standards of ODATA and the recipient's employer, when known.

There must be linkage and a legitimate and verifiable business purpose, and it must be offered on behalf of ODATA and not the individual offering it, and it cannot be extended to relatives and spouses.

The value of the meal, gift, courtesy, present, travel and entertainment offered must be reasonable, subject to the specific conditions and limits determined by ODATA rules. It must also be something appropriate to the circumstances of the occasion and the position of the recipient.

No such gifts, courtesies, or gratuities should ever be offered with the intent to gain improper advantage or to improperly influence a decision or action, to create a sense of obligation or an appearance of impropriety, to be intended as a bribe, or to be offered frequently to the same recipient.

If the Associate receives gifts, courtesy, hospitality, or any other present, the value of the item must not exceed R\$300.00 (three hundred reais). If it is higher, and its acceptance is expected from the point of view of local customs, the fact must be communicated and approved by the Ethics Committee, under the terms defined in the internal rules and policies of ODATA.

Any donation, regardless of the amount, must be authorized by the ODATA's Managing Director, after review by the Ethics Committee. As a general rule, donations should have a legitimate purpose and proven social benefit, and no donation or charitable action may be performed by third parties on behalf of or in reference to ODATA.

Under no circumstances, donations allowed:

- a) With the purpose of obtaining undue advantage or as facilitation payment;
- b) To political parties, candidates, or pre-candidates for public office;
- c) To entities that have connections with public officers, their relatives, or their advisors;
- d) To entities of any kind linked to political parties or people who have held public office;
- e) For individuals;
- f) In kind.

EVERY MEAL, GIFT, COURTESY, PRESENT, TRAVEL, AND ENTERTAINMENT OFFERED TO A THIRD PARTY MUST BE SUBJECT TO EVALUATION AND ACCOUNTING REGISTRATION.

The offering of gifts, courtesies, presents, travel, and entertainment to Public Agents is not authorized. Exceptions may be reviewed and approved in advance by the Ethics Committee.

The receipt and acceptance of awards and participation in partner rewards must be previously authorized by the Ethics Committee.

ODATA prohibits facilitation payments, regardless of the amount. All professionals should avoid any attitude or activity that might suggest payment or receipt of facilitation.

NO CONTRIBUTIONS TO POLITICAL PARTIES OR POLITICAL PERSONS ARE ALLOWED ON BEHALF OF ODATA.

Any sponsorship must be approved by the Managing Director, after review by the Ethics Committee. No sponsorships are allowed to:

- a) Individuals;
- b) ODATA employees or former employees terminated less than 24 months ago;
- c) Legal entity that is included in the Registry of Impeded Private Non-Profit Entities - CEPIM(www.portaltransparencia.gov.br/cepim);
- d) Legal entity that is included in the National Registry of Punished Companies - CNEP(<http://www.portaldatransparencia.gov.br/cnep>);
- e) Legal entity that has, among its partners and directors, relatives of employees or former employees of ODATA;
- f) Project with bad reputation or lack of integrity, that exploits child, degrading or slave labor, that goes against the public order, that may generate judicial demand or that harms the image of ODATA, its subsidiaries, subsidiaries, or affiliates;
- g) A project that characterizes the personal promotion of an authority or public servant of the Federal, State, Federal District, or Municipal governments.

HIRING SUPPLIERS:

Suppliers are all service providers, goods suppliers, partners, consultants, and subcontractors, whether individuals or legal entities.

Hiring suppliers must be based on strictly legal and technical criteria of quality, cost, and punctuality, and require an ethical and transparent profile in their business conduct and social and environmental management, therefore, the process must follow the Supplier Hiring Policy in effect and every hiring must be preceded by an evaluation of the situation of the Supplier and its history, including reputational diligence, if applicable, according to the procedure described in the Supplier Hiring Policy.

The hiring of: (i) companies belonging to ODATA employees (or relatives of such) or affiliated companies or Public Agents; (ii) hiring of Suppliers with remuneration in the form of commission or success; (iii) hiring of individuals; (iv) hiring of individual legal entities, and (v) hiring by indication (without competition), offer risk of various natures to ODATA and can be used as instruments of corruption. For this reason, any hiring under the conditions described above must be preceded by approval from the Ethics Committee.

In the situations described above, if the Supplier has been indicated by the Associate, the latter must communicate the existence of the conflict of interest to his or her immediate superior, and, if possible, abstain from the decision to hire the Supplier.

RELATIONSHIP WITH SUPPLIERS:

ODATA undertakes, in the conduction of the contracting processes and during the development of the provision of services, to obey and demand from its providers the fulfillment of the principles of legality, morality, efficiency, and act with respect to human rights, principles and fundamental rights of labor, environment, health and development, including, but not limited to the following points:

- a) To care for the image, interests, and commitments agreed upon, respecting and valuing diversity, ensuring equal treatment, and repudiating any kind of prejudice and discrimination;
- b) Repudiate child labor, in degrading conditions or analogous to slavery;
- c) Repudiate harassing conduct of any kind;
- d) Ensure safety in the execution of the work, facilities, equipment, and systems;
- e) Maintain communication channels, provide clear and appropriate guidance, information, and requirements, so that the objects of the contracts are understood and meet the agreed conditions;
- f) To preserve the information of a private nature, provided by any of its suppliers and service providers, during and after contracting or acquiring products and services;
- g) To develop relationships based on fair competition in all its aspects and mutually satisfactory business practices;

- h) To adopt good environmental preservation practices, preventing harmful practices to the environment and performing its services in compliance with the legislation in force, especially with regard to environmental crimes;
- i) To adopt practices to prevent and fight money laundering, influence trafficking, terrorism financing and corruption, crimes and any type of illicit act, training all of its contractors on the themes;
- j) To establish sanctions for employees who act in their own or a third party's benefit, presenting acts of undue advantage to any supplier or who offer or accept offers that may be considered as a quid pro quo for any contractual advantage.

ODATA understands that mutual cooperation allows the establishment of a solid and lasting relationship, therefore, compliance with the guidelines is essential for a partnership of excellence.

ODATA'S ASSETS

ODATA's assets comprise not only its material goods, but also the immaterial ones such as its name and image, which reflect its credibility and reputation. Thus, the Associates and Third Parties, when applicable, must behave so as to:

- Preserve the physical assets of ODATA, as if it were their own, including facilities, equipment, machines, materials, vehicles, and accessories, using them only for the purposes for which they are intended and within the limits of the attributions of the company's assets, bearing in mind that the misuse or damage to the assets of the company may be subject to indemnity by the causer;
- Preserve the Company's name and image by: (i) refraining from carrying out any type of public manifestation that could harm its reputation, including on social media or among co-workers; (ii) not get involved in derogatory discussions in relation to ODATA and if you are aware that a colleague is denigrating the Company's image, alert him/her to the irregular behavior, and (iii) not be afraid to communicate the fact through the Ethics Channel or your superior;
- Do not link the name and/or image of ODATA to programs or events of political party, religious, cultural, charitable or any other nature, without prior authorization from the Management;
- Refrain from making any public statement on behalf of ODATA, unless expressly authorized to do so, not comment on the confidential and/or strategic business of the Company with third parties and remember your obligation of confidentiality towards ODATA and its partners, customers and Suppliers contractually imposed;
- Refrain from making any comment in social networks and/or media in general regarding ODATA Suppliers, partners, customers, and competitors, even if it does not represent the position of ODATA;
- Ensure the maintenance and cleanliness of the Company's facilities;
- Do not allow unauthorized third parties to make use of the facilities, equipment, machines, materials, and accessories of ODATA, for free or charge, and do not use the assets of ODATA for personal purposes or that are not related to your work in the company.

- Associates are forbidden to give interviews to any form of press, including, but not limited to newspapers, magazines, internet, unless previously authorized by the Management.

It is important to remember that the corporate email, even if a personal password has been provided, has a strictly professional purpose and, thus, the information and messages exchanged through it are ODATA's property, and can therefore be monitored. Associates should have no expectation of privacy with regard to matters subject to corporate e-mail or messages sent or received on corporate cell phones.

BOOKS AND RECORDS:

ODATA must keep records and have appropriate internal controls in place that evidence the business reasons for payments to third parties.

In the course of these proceedings, ODATA strongly condemns any acts of fraud, corruption, or other unlawful acts, including, but not limited to:

- a) Changes or omissions of documents, data and financial information and accounting records;
- b) Misuse or theft of resources, financial or otherwise;
- c) Improper use or disclosure of confidential financial or non-financial information;
- d) Adulteration of results to meet targets, either to achieve positive results or to omit negative results;
- e) To use procedures that violate tax laws, aiming to suppress or reduce taxes or social contribution and any accessory.

The need to properly record all transactions faithfully and accurately extends to all original documents, including invoices, receipts, and expense reports, not just accounting books.

Professionals must take care to ensure that all expenses are documented accurately and completely, regardless of the amount of the transaction. Under no circumstances should false or misleading documents appear in the company's books and records.

Improper, ambiguous, or fraudulent accounting entries, and any other accounting procedure, technique, or artifice that could conceal or in any way disguise illegal payments, are not permitted.

PRECAUTIONS IN THE PARTICIPATION OF ASSOCIATES IN THE EXERCISE OF THEIR FUNCTIONS:

Associates may not use privileged or confidential information of ODATA, obtained due to their position in the organization, for personal benefit or indirect gain.

Associates must avoid any business or personal action that conflicts or has the appearance of conflict with the business and interests of ODATA, facilitate, by way of friendship or kinship, the acceptance of Third Parties in

disregard of the approval criteria in line with the legislation, this Code and/or policies of ODATA, which may compromise the professionalism, impartiality, transparency, and seriousness by which ODATA's business must be conducted.

Whenever there is doubt as to the existence or not of a potential conflict of interest, the relationship must be declared to the Ethics Committee for analysis, via e-mail: compliance@odatacolocation.com

CONFIDENTIALITY

The activities, projects, plans and documents prepared and/or discussed internally, including but not limited to information of a technical, operational, commercial, legal, know-how, inventions, processes, formulas and designs, *business plans*, accounting methods, techniques and accumulated experience, documents, contracts, papers, studies, opinions and research, and which due to their essential characteristics or due to factual circumstances, cannot be made public, constitute confidential information that is not of knowledge of the market and the general public and which, if disclosed, could jeopardize the Company's business. Therefore, one must:

- Treat with secrecy and confidentiality with all matters involving ODATA and of which it is aware, such as, but not limited to, customer data, market information, internal occurrences and other financial, economic, operational and contractual matters of the Company, avoiding its reproduction and/or disclosure to unauthorized third parties, including family members; whenever in doubt, ask the Company's Legal Department about any disclosure you wish to make that you believe may involve confidential information;
- Do not use any confidential, privileged, or strategic information for your own benefit or for the benefit of Third Parties;
- Promptly inform your superior, the Director of your area, or the person responsible for negotiations, if you are required by law or court order to disclose any confidential information.

The confidentiality obligations described herein do not replace but complement those described in the employment contract concluded between ODATA and the Associate, service contract between ODATA and Supplier, or commercial contracts between ODATA and customers/business partners.

EXTERNAL RELATIONSHIP

The activities developed by ODATA's Associates result, many times, in the need to relate with customers, suppliers, service providers, competitors and, even, with public authorities. In this way, the Associate must always:

- Conduct business relationships in strict compliance with the law, market practices, good custom, and the guidelines of regulatory agencies;
- Be diligent, cordial, and attentive in dealing with customers, Suppliers, service providers or any other companies that relate to ODATA;
- Never do business aiming at direct or indirect personal interest or advantage;
- Strictly observe the operational standards and safety norms set by ODATA, especially procedures, deadlines, and ways of reporting;
- Do not make any improper payments or receipts that can be characterized as bribery, corruption, or kickbacks. Acts of corruption can bring serious consequences to ODATA and to the Associate. If in doubt, ask the Company's Legal Department about the best course of action in a given situation;

- Refrain from receiving or giving to customers, Suppliers, or service providers any gift or facility that could be characterized as undue personal favor. Never give any gift or offer any gratuity or benefit to public officials;
- Do not make any kind of agreement or arrangement, whether written or verbal, with companies competing with ODATA, partners, suppliers or associates of competitors of ODATA, without the prior authorization of the Management;
- ODATA respects existing competition and antitrust laws. All Associates must reject all actions that could be interpreted as non-competitive, monopolistic, cartel-like, or contrary to local national or international laws governing competitive market practices;
- Refrain from making any informal comments and promises regarding competition and ongoing contracting, with the intention of benefiting oneself or others.

ODATA prides for the legality of its acts and, therefore, will not tolerate any illegal conducts by its Associate. The Legal Department will always be at your disposal to guide you in case of doubts about legal issues.

INFORMATION SECURITY

ODATA cares for the security of your information and of the information of third parties that are of your knowledge, always respecting the level of restriction of the referred information.

In this way, the Company is committed to protecting all information known to it, using appropriate and reasonable mechanisms, and demands from its Clients, Commercial Partners, Suppliers, Service Providers and Associates the same care and commitment to security against access and use unauthorized, inappropriate, or any form of treatment in violation of the provisions of this Code of Conduct, for the information transmitted by ODATA.

The personal data of Associates and Third Parties, where applicable, are subject to specific laws and regulations, thus requiring special treatment. Therefore, additional information regarding the processing, obligations, and determinations for the protection of personal data can be found in ODATA's Personal Data Protection Policy.

MERGERS AND ACQUISITIONS, JOINT VENTURE, AND CONSORTIUM

The performance of ODATA in *joint ventures*, consortiums, mergers and acquisitions will always follow ethical standards and those provided for in the laws to combat corruption and money laundering.

ODATA will provide specific diligence, in order to verify the suitability of the partner company or to be acquired, as well as its compliance with all legal provisions to which it is subject.

ODATA reserves the right not to sign contracts with companies that are not in compliance or that do not present the necessary information, especially with regard to the liability set forth in Laws No. 12.846/13 (Brazil), No. 1.778/16 (Colombia), No. 1.437/11 (Colombia), No. 21.121/18 (Chile) and in the General Law of the National Anti-Corruption System (Mexico).

ASSOCIATE PARTICIPATION IN OUTSIDE BUSINESS OR EARNINGS

ODATA recognizes and respects the individual right of each Associate to participate in outside business, provided that they do not represent a conflict of interest.

ODATA recognizes the right to outside work by Associates, provided that such activities are:

- a) Licit;
- b) Do not conflict with the Associate's responsibilities and work schedule;
- c) Do not compromise the proper performance of your duties;
- d) Do not expose ODATA's business to risk.

The opportunities for extra personal gains outside ODATA, should not involve, under any circumstances, connection with the name of the organization and its brands, any of its companies, affiliates or any of its services, products, or businesses. Nor should they be tied to the use of influence, relationships, information deemed confidential, or other resources of any of the ODATA companies.

INCLUSION AND DIVERSITY

ODATA is a company committed to promoting a work environment stimulated by diversity, providing inclusive, fair, productive, and healthy opportunities in all its internal and/or external relationships.

Discrimination on the basis of race, color, age, sex, sexual orientation, religion, nationality, political conviction, physical limitation, physical or mental disability, or social class is not tolerated under any circumstances, whether on the part of employees, suppliers and/or business partners.

ODATA guarantees a recruitment and selection process that considers the qualification of the candidates in relation to the position description, culture, strategies and needs of the company, always guided by ethics and in accordance with the individual values of the candidate, without prejudice to the institutional values.

For believing in solid values, ODATA recognizes diversity and inclusion as a source of enrichment and continuous growth for its employees and business, as well as a contribution to the services that the company provides to the communities it operates.

ETHICS CHANNEL

Any doubts, questionings, communications, or specific situations faced by the Associate, Supplier, Service Provider, Customer, or Business Partner, regarding compliance with this Code or violations of it, should be addressed through the following e-mail: compliance@odatacolocation.com, to any member of the Ethics Committee.

It is also possible to file a report by phone or through the external reporting site created by a third party for ODATA. To access the ODATA Ethics Channel and obtain guidance on how to use it, please visit our website (<https://odatacolocation.com/en/integridade>). The Ethics Channel is available 24 (twenty-four) hours a day, seven (7) days a week, or by telephone, depending on the location, as informed on the website.

The Ethics Channel is maintained by outsourced and specialized service providers, and is available to Associate, as well as to business partners, service providers, customers, and Suppliers, whether direct or indirect.

The occurrence received will be registered and forwarded to the members of the Ethics and Conduct Committee and shareholder representatives, as the case may be, for the necessary measures to be taken. All information is confidential, and the complainant's data is protected against unauthorized use and/or access.

ODATA STRONGLY CONDEMNS ANY FORM OF RETALIATION AGAINST THE USERS OF THE ETHICS CHANNEL.

ODATA is committed to protecting from retaliation any person who, acting in good faith, has made a report or is assisting in an investigation, including, but not limited to: suspension, harassment, threats, intimidation, coercion, loss of benefits, termination, or any other form of discrimination or punishment. ODATA's Denouncement Reporting and Non-Retaliation Policy aims to establish the company's guidelines and is a complement to the definitions contained in this code and other applicable rules and policies.

Therefore, people who believe they have been the victim of any form of retaliation or have questions about it, should report it through the Ethics Channel, or directly to their manager, the Compliance Officer, one of the members of the Ethics Committee, the Human Resources Department, and/or the Legal Department. Reports of retaliation will also be reviewed and investigated.

SANCTIONS AND DISCIPLINARY MEASURES

This Code of Conduct, as well as other policies, procedures, and internal rules of ODATA should be read and complied with by all the Associates, Suppliers, Service Providers, Customers and Business Partners of the Company.

Associates who fail to comply with any of the determinations set forth in this Code of Conduct, in ODATA's policies, procedures and internal rules, including, but not limited to, the Anti-Corruption Policy and Information Security Policy, among others, will be subject to the sanctions set forth below, in addition to other applicable civil and criminal sanctions:

- a) Verbal warning;
- b) Written warning;
- c) Suspension;
- d) Dismissal (with or without cause, when applicable).

The application of any of the disciplinary measures described above will be defined by the ODATA Ethics Committee and validated by the Board of Directors, according to the severity of the infraction.

The legislation carries severe penalties related to corrupt practices, both for individuals and legal entities, ranging from restrictive sentences of freedom, substantial fines, and compulsory dissolution of the legal entity (in the case of Brazilian legislation).

ETHICS AND CONDUCT COMMITTEE

The occurrences and other communications made through the Ethics Channel (or even through the *Compliance Officer*, Legal Department, HR Department and/or directly to the manager) will be analyzed impartially and confidentially by the ODATA Ethics and Conduct Committee ("Ethics Committee").

The Ethics Committee is composed of 5 members elected by the Executive Board of ODATA Brazil and duly ratified by the Board of Directors of ODATA Brazil. The Committee of companies located outside Brazil, besides the five members described above, will also count on the presence of the local Country Manager.

The Ethics Committee, the *Compliance Officer* and the Legal Department are the internal ODATA instances responsible for the observance and enforcement of the provisions of this Code.

The Legal Department will promote the development and implementation of periodic trainings for ODATA's Associates, on the application of the provisions of this Code. It is also up to the Ethics Committee and the Legal Department to periodically analyze the risks in order to make the necessary adaptations to the Code of Conduct and Anticorruption.

AGREEMENT

I confirm that I have received, carefully read, and understood ODATA's Code of Conduct and Anti-Corruption, and I am aware that the principles and conduct described therein shall be followed by all Associates and Third Parties involved, under penalty of application of possible sanctions and/or disciplinary measures described in said Code.

I will disclose a violation or potential violation of this Code or conflict of interest resulting therefrom to Company management, or through the Ethics Channel for this purpose, as set forth herein.

Name (shape letter): _____

Position: _____

Signature: _____

DATE: ____/____/____