

Code of

CONDUCT

solfácil



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MESSAGE FROM THE **PRESIDENT**

The process of founding, building, and scaling a disruptive company in a country like Brazil, full of inefficiencies, has not been easy and continues to be challenging. In a fast-paced and uncertain environment, we have always had to rely on common sense and our intrinsic values to make quick and effective decisions.

Our Code of Conduct was structured so that our organization, which grows more each day, can always make decisions aligned with Solfácil's purpose, values, and ethical standards.

Fábio Carrara



APPLICABILITY

The Code of Conduct of Solfácil applies to all employees, board members, interns, apprentices, consultants, service providers, suppliers, partners, integrators, clients, and related entities of Solfácil and its subsidiaries, encompassing current, potential, and former interactions, as relevant.

WHAT IS THE **PURPOSE** **OF THIS** **CODE?**

To foster a corporate culture rooted in ethics and integrity, inspiring all activities and interactions at Solfácil. It aims to enhance transparency, accountability, and mutual respect, both within our internal environment and in our dealings with external parties.

OUR **PURPOSE**

To empower individuals through solar energy, guided consistently by ethical and sustainable principles.

The logo for Solfácil, featuring the word "solfácil" in a lowercase, sans-serif font. The letter "o" is replaced by a stylized sun icon consisting of several horizontal lines of varying lengths, creating a semi-circle.



OUR VALUES

UNITY

We collaborate towards a common goal, engaging in discussions without ego, debating without prejudice, and disagreeing without concern for hierarchy, united as one team.

PASSION

We are driven by our mission, focused on realizing our goals, and energized by the challenges we face.

DRIVE FOR IMPROVEMENT

We aim to improve daily, facing risks head-on, making swift decisions, and not being deterred by obstacles.

DRIVE FOR IMPROVEMENT

There is no right way to do the wrong thing.

OUR PRIORITIES



- Our success is intertwined with that of our partners and clients.
- We grow together, both as individuals and as a team.
- We embrace our differences, recognizing diversity as a catalyst for ideas and impact.
- We are committed to ensuring our business and its impacts are sustainable over time.

WHAT IS NOT ACCEPTABLE TO US

- Acting against the best interests of Solfácil.
- Failing to uphold truthfulness in all our interactions.
- Not setting a positive example.
- Engaging in unethical behavior.
- Not fostering an inclusive and respectful environment.

COMPLIANCE

Solfácil's senior management provides full support to the Compliance function, ensuring its total autonomy and independence.

At Solfácil, mutual respect is a core value. As such, we:

- Reject any form of discrimination, intimidation, bullying, or harassment. This includes, but is not limited to, race, color, religion, nationality, ethnic origin, age, gender, sexual orientation, marital status, disability, or political opinion. Diversity is our strength.
- Do not tolerate or engage in any form of illegal labor, forced labor, or child labor, except in legally sanctioned apprenticeship schemes. Our commitment is to fairness and respect in the workplace, regardless of position or role.
- Base our relationships on integrity. We act in good faith and accept responsibility for our actions, especially when things do not proceed as expected.
- Always interact with third parties ethically, transparently, and responsibly, treating everyone with the respect we seek in return.
- We operate in compliance with laws, regulations, and tax obligations, adopting ethical and transparent practices in our activities. Our guidelines prevent fraud, nepotism, undue favoritism, and other illicit practices, including in our dealings with public officials and in the acquisition of licenses and permits.

Upon identifying any irregularities, we will promptly take action to correct the issue and implement the necessary measures to mitigate the impacts.



CONFLICT OF INTEREST

At Solfácil, we value integrity and transparency. Keep in mind:

- **Fair Choices:** We choose products and services based on quality and technical expertise, not personal ties.
- **Confidential and Privileged Information:** We always protect confidential and privileged information.
- **Outside Activities:** Activities in other companies, especially competitors, may be prohibited to avoid conflicts of interest. If in doubt, consult your contract.
- **Politics and Religion:** We respect each individual's freedom in political and religious activities. However, we ask that these be kept out of the workplace to ensure impartiality and focus on professional activities.

- **Public Officials:** Maintain ethical and legal interactions with public officials, avoiding any form of undue influence or corruption.

Our relationships with public officials are guided by integrity. We strongly reject any conduct that could lead to administrative misconduct, always ensuring compliance with the law and transparency in our actions.

We reject any practices that could constitute fraud in public tenders or administrative misconduct, ensuring strict compliance with the law in all our actions.

Directors and employees who have relatives that are public officials with decision-making power in business and operations involving government agencies and entities must immediately disclose this relationship to the company.

PROMOTIONAL GIFTS, CORPORATE GIFTS AND HOSPITALITY

While we acknowledge that promotional gifts (items with no commercial value, usually bearing the company's logo), corporate gifts (items with commercial value, such as beverages, electronic devices, etc.), and hospitality (business meals, trips, and entertainment), whether received from partners or offered by us, are part of the business world.

However, we have some clear rules to ensure integrity and transparency:

- **Business Meals:** Whenever feasible, each party should bear their own expenses.
- **Value Limit:** Promotional or corporate gifts or hospitality valued at up to R\$250,00 are acceptable as a courtesy. Anything exceeding that should be politely refused.
- **Difficult Situations:** If it's challenging to decline a gift or hospitality, such as an unexpected gift through the mail, consult our Compliance team for the appropriate action, including return, reimbursement, or donation to a certified charity.

Transparency is crucial. When in doubt, reach out to us!

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ANTI-CORRUPTION

At Solfácil, we adopt a zero-tolerance policy towards corruption. This applies to everyone: employees, directors, interns, or trainees. Under no circumstances is it acceptable to offer, promise, give, request, or accept any type of advantage or benefit, financial or otherwise, in exchange for favors or influence. This applies to both direct and indirect actions.

Any attempt to engage in corruption goes against Solfácil's values. Our commitment to transparency and ethics guides all our actions and decisions. Anyone, including members of senior management, involved in acts of corruption or fraud against the public administration will be immediately removed from their duties, ensuring the transparency and integrity of the company's operations.

We have implemented strict measures to prevent and address fraud, ensuring that our processes are secure and that any irregularities are promptly investigated and corrected.

Anti-Money Laundering, Countering the Financing of Terrorism and Proliferation of Weapons of Mass Destruction (AML/CFTP)

Solfácil does not endorse any form of money laundering or terrorism financing and commits to conducting business only with partners and clients who operate legally and whose funds originate from legitimate sources.

SOCIAL AND ENVIRONMENTAL **RESPONSABILITY**

At Solfácil, we acknowledge the importance of social and environmental responsibility as an integral part of our business ethos. We encourage sustainable practices, proper disposal of equipment and materials, and advocate for safety, health, and well-being, aiming to build a more conscious and balanced future.

ETHICS CHANNEL

At Solfácil, we value every individual's voice. That's why we've created the Ethics Channel, a completely confidential platform overseen by an independent third party, upholding the utmost standards of privacy and fairness in every inquiry.

Access our Ethics Channel through the link:

<https://solfacil.clickcompliance.com/reporting-channel>

via WhatsApp or toll-free at:

0800 878 9688

Reports may be submitted either anonymously or with identification. Whichever option is selected, we guarantee total confidentiality to safeguard the whistleblower's identity.

At Solfácil, we listen. If you have reported something in good faith, count on our support to protect you from any form of retaliation. Safety and trust are our utmost priorities.

The logo for Solfácil, featuring the word "solfácil" in a lowercase, sans-serif font. The letter "o" is replaced by a stylized green sun icon with horizontal lines.



DATA **PRIVACY**

Our data privacy policy is public and accessible on our website:
<https://landing.solfacil.com.br/politica-de-privacidade>

INFORMATION **SECURITY**

At Solfácil, we are vigilant in maintaining the security of confidential, proprietary, or privileged information, thus preventing leaks to the press or competitors. This practice not only protects Solfácil but also our employees, partners, clients, suppliers, and investors, ensuring integrity and trust in all our business relations.

INTELLECTUAL **PROPERTY**

The intellectual property rights, encompassing products, services, logos, trademarks, copyrights, inventions, or improvements derived from our expertise, belong exclusively to Solfácil. Any use of these assets requires prior approval from Solfácil's Marketing department.



DISCIPLINARY **MEASURES**

Violations of this Code may result in disciplinary actions, including penalties as stipulated in applicable contracts, legislation, and regulations.

INCORPORATING THIS CODE INTO **YOUR DAILY LIFE**

- 1 Delve into the details:** Read carefully and understand the underlying principles. This Code serves as a roadmap for ethical conduct at Solfácil.
- 2 Practice daily:** Lead by example. In every action, consider how the Code applies. This is how we cultivate an inspiring and ethical work environment.
- 3 Speak up without fear:** If you have questions or face ethical dilemmas, we are here to assist. Use the communication channels outlined in this Code as your guide to making wise and fair decisions.

Adhering to this Code is crucial for being part of Solfácil's ecosystem and contributing to the democratization of solar energy for everyone.