

A photograph of three people walking through a modern, open-plan office space. On the left, a woman with curly brown hair and glasses wears a light pink trench coat over a white turtleneck and blue jeans, carrying a colorful patterned folder. In the center, a woman with long dark hair wears a brown blazer over a light blue shirt and tan trousers, holding a tablet. On the right, a man with curly brown hair and glasses wears a denim jacket over a striped shirt and tan trousers, holding a white folder. They are all smiling and looking towards the right. The office has white cubicles, wooden floors, and large windows in the background.

CODE OF ETHICS AND CONDUCT

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I address you with the purpose of reaffirming the values that have guided us and must continue to accompany us on our journey: integrity, commitment, and ethics in all our actions.

Our company has been built upon trust, respect, and responsibility

Each of us, from our respective roles, has the responsibility to act with transparency, fostering a work environment where honesty and uprightness are fundamental principles. Ethics is not merely a concept; it is a daily practice that influences our decisions and the way we interact with one another, as well as with our clients, suppliers, and partners. Acting with integrity means doing the right thing, even when no one is watching.

I invite you to always keep these values at the core of our work, day by day. Consistency between our words and actions strengthens our corporate culture and enables us to build solid and lasting relationships. I deeply appreciate your commitment to these principles and trust that together we will continue contributing to an ethical, responsible, and excellent company.

Marcelo Castiglione Veloso
CEO SONDA

Introduction

Sonda's Code of Ethics and Conduct (the "Code") is based on a set of principles and values that have guided the company's action since its inception. Its adherence to high and legal standards must be observed in the conduct, behavior, decisions of all its administrators and collaborators at SONDA S.A. and its subsidiaries in the development of activities.

The reputation of the company, along with its clients and their personnel, constitutes one of the main assets of SONDA. Compliance with this Code is therefore essential to maintaining a strong corporate image.





II. Scope

- a) This Code applies, without distinction, to the collaborators, directors, managers and advisors of SONDA S.A. and its subsidiaries, hereinafter all jointly referred to as SONDA.
- b) Suppliers of goods and services, as well as third parties in general must be aware of the provisions of the Code and observe its terms in all acts or contracts with or on behalf of SONDA.

III. Corporate Values and Principles and Expected Conduct



a) Our purpose

To contribute to improve people's quality of life, by innovating and adding value through technological solutions that develop and transform the business and our clients' endeavors.



b) Corporate values

In SONDA, the existence of a set of principles and values has been vital,

and collaborators are encouraged to adhere to the most relevant:

A people company: We want to manage talent in a motivating, encouraging and friendly work environment, that allows collaborators to reach their fullest potential while aiming for professional development and personal fulfillment.

Vocation to serve: We are committed to a deep vocation to serve our customers with passion and in the best way, based on a customer-oriented approach.

Agility: We want to be recognized for always be looking for simple, effective and even disruptive solutions, constantly moving towards change and action.

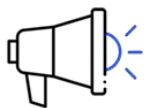
Positive attitude: Our goal is to make progress by enhancing our skills, taking on opportunities for improvement as new challenges arise.

Frugality: We want to stand out for our simple and sober style, using resources more efficiently.

“

Our
purpose is to contribute to
improve people's quality of
life

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c) Value transmission

The company firmly believes that the best way to promote its values, principles, good practices and guidelines of conduct is by sharing them with all employees of SONDA S.A. and its subsidiaries.



d) Responsibility

SONDA collaborators must act with responsibility and always do what is right, relying on the present Code as reference frame.



e) Adherence to ethics and lawfulness

SONDA seeks the achievement of its business objectives based on the quality of its products and services, as well as on well executed and honest work, while rejecting, consequently, improper or illegal conduct.



f) Fundamental principles

SONDA conducts its business observing high ethical standards, with respect for people, their lives and freedom, by promoting responsibility and compliance with healthy coexistence. Thus, allowing the achievement of the professional goals and objectives

of its collaborators.

SONDA thrives and progress through reliability, respect and trust with all parties based on adherence to the standards and compliance with the current legislation.

SONDA is committed to always act correctly and transparently with its collaborators, customers, investors, banks, goods and services suppliers, and to perform with respect for its competitors while promoting social responsibility.

SONDA will maintain an environment of respect and equality with collaborators and third parties, rejecting all types of discriminatory acts for personal or arbitrary reasons.

No act related to sexual or occupational harassment will be accepted, even without hierarchical links.

SONDA always acts based on social responsibility and respect for the environment.



IV. Specific guidelines of conduct

a) Conflicts of interest

In the exercise of their functions, all administrators and collaborators must act in agreement to the social interest abstaining to oppose their own interests to those of the company. The definition, treatment and resolution of conflicts of interest is covered in Chapter V of this Code.

b) Competitors and free competition

SONDA promotes and respects free competition. Therefore, it is forbidden to make agreements in word or writing with competitors, customers or

suppliers that restrict the exercise of free trade.

The competitiveness of the company is based on an ethical administration of its businesses. The relationship with competitors and their collaborators must be conducted with respect and in observance of legal regulations.

No statements should be made that may affect the image of the competitors or that contributes to spread rumors about them. Competitors will be treated with the same respect that the company expects to be treated with.

It is prohibited to provide strategic, confidential or otherwise harmful information to the business or third parties.



c) Clients

Clients are key for the success of SONDA. The company has a constant concern to satisfy the requirements of its clients and provide quality services, with care and a vocation for service, fulfilling all its contracts in an honest, transparent and fair manner.

Through a high quality supply of products and services, SONDA aims to know and anticipate the needs of its clients, and by all means possible, to exceed their expectations.

It is the duty of all employees of SONDA to serve clients with respect, courtesy, promptness and efficiency, not tolerating discrimination of any kind.

Preferential treatment will not occur to a client based on personal criteria.

In all the decisions made based on the relation with its clients, SONDA will prioritize impartiality and will be free of all favoritism or partisanship, observing strictly the applicable legislation.

In the case of public sector clients, all the necessary analyses will be carried out to guarantee transparency and compliance with laws and regulations.



d) Collaborators

SONDA recognizes and values the role of its employees in the progress and operability of the company. It is especially interested in ensuring their dignity, health, safety and professional and personal development, respecting their rights, all within a positive work environment.

SONDA's relationship with its collaborators is based on compliance with legislation,

employment contracts, collective agreements and internal regulations.

Relationships in the workplace should be guided by a positive, friendly, transparent and a mutual respectful attitude, where people perform looking for the best results with team spirit, professionalism, loyalty and trust

Training, professional experience and ability to incorporate SONDA's principles are considered a fair criterion for the admission and promotion of collaborators.

Employee evaluations should consider quality, efficiency, effectiveness and attitude in fulfilling their responsibilities.



SONDA recognizes and values the role of its staff. It is of particular interest ensuring employees' dignity, health, safety as well as professional and personal development



It is the duty of all collaborators to dedicate work hours to the interests of SONDA, avoiding any inappropriate activity that may compromise the parties involved.

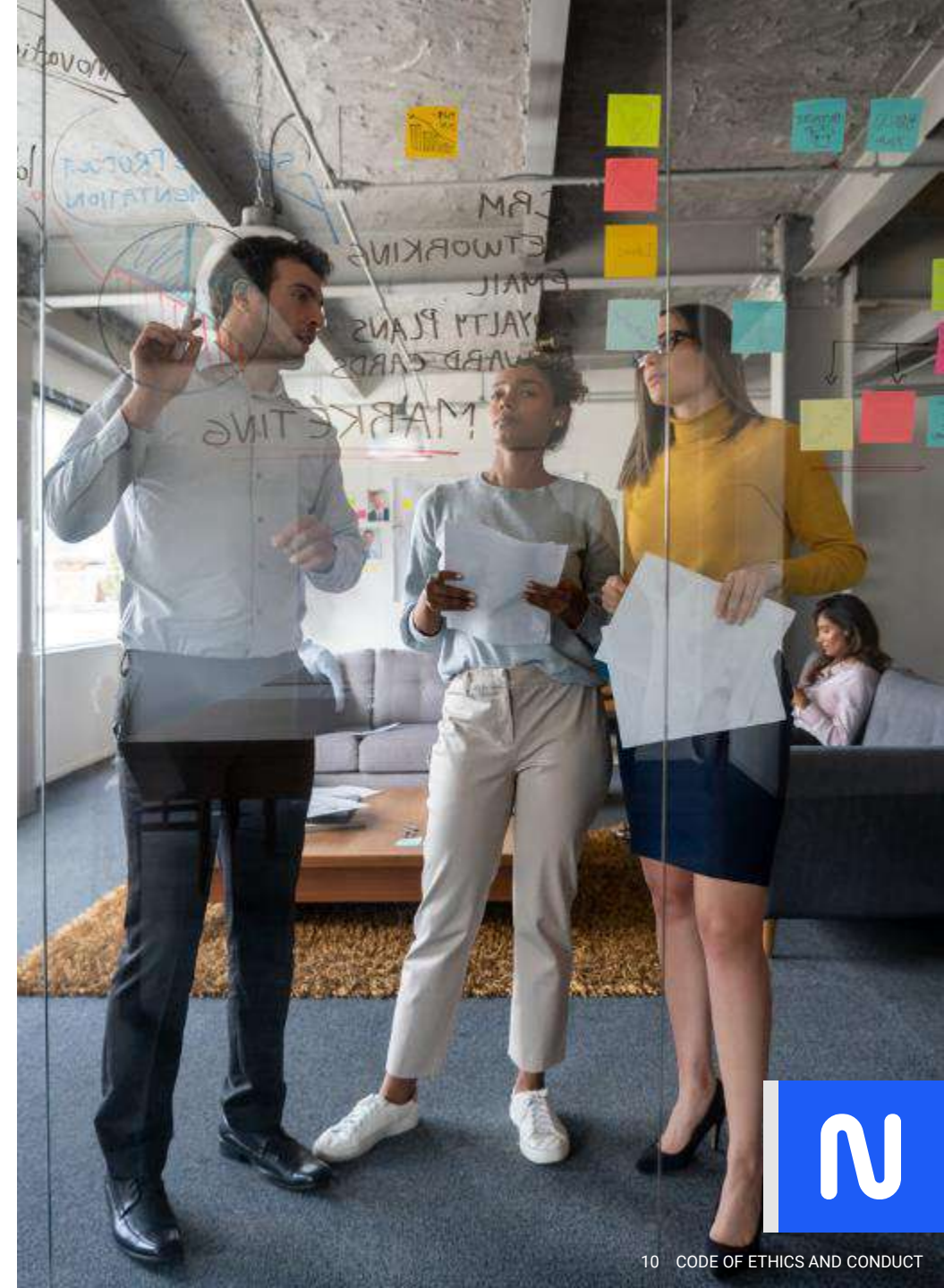
Contributors, administrators and advisors who have or access information or facts of a confidential nature must keep it strictly confidential, even after ending their relationship with SONDA

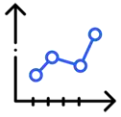
Collaborators must communicate to their supervisors any irregularities that comes to their knowledge as well as any data or fact that may cause damage to third parties or to SONDA.

Employees must adequately secure and maintain the entrusted materials and equipment, as well as maintain a proactive attitude regarding waste disposal and cost reduction.

SONDA maintains an open and honest dialogue with unions and employee

organizations, seeking harmony in labor relations, always ensuring conditions of efficiency, productivity and competitiveness.





e) Shareholders, potential investors and financial analysts

The company grants equal treatment to all its shareholders, subject to current regulations and confidentiality in conducting business and makes transparency a goal in the relationship with its investors. The company ensures the best possible management of the assets of its shareholders.

SONDA shares adequately represent the value of the company's business.

To achieve this goal, in addition to consistently generating solid financial results, SONDA seeks to build relationships with its shareholders and the market of capitals through accurate, transparent, timely and equal communications with the necessary

information to monitor the company and its businesses. These communications are prepared by authorized collaborators to perform this task.

Every effort is executed by promoting the adequate return of shareholders and investors, either through dividends or by increasing the value of shares issued by SONDA in the market, in order to maintain such shares as an attractive investment alternative, and thus offer the company more options to maintain its expansion programs in the long term.

No collaborator may make use of inside information to sell or buy shares of the company, either directly or through third parties, under penalty of application of the corresponding legal sanctions.



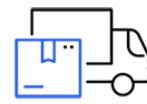
f) Gifts and invitations

Since giving or receiving gifts or invitations that are not institutional can create a real or apparent conflict of interest, collaborators can only give or receive gifts that are mainly related to merchandising items, appropriate invitations according to the business context and courtesies of symbolic value.

In this way, it is forbidden to request gifts, commissions, gratuities or any kind of benefits, advantages or any other privilege in the purchase of goods and services that may compromise the relationship with the supplier or damage the image of the company.

To comply with these principles, SONDA has a Corporate Gifts and Invitations Policy available on the

company's intralink, in which the maximum amount is declared. This ensures the transparency of the received gifts and guarantees that the invitations will be made within the context of legitimate commercial purposes and are approved in advance by the Compliance Officer.



g) Goods and services suppliers

The relationship between SONDA's collaborators and their suppliers remains strictly independent and in accordance with the interests of the company. This implies choosing suppliers on the basis of eminently professional criteria. Selection procedures must be objective and transparent. Based on the results of the risk assessment, questionable negotiations with companies or individuals as to their probity shall be avoided.

The relationship with suppliers must be conducted on honest, transparent and fair terms, always looking for the interest of the company. In the search and selection of suppliers, clearly defined and predetermined technical factors will be considered in order to get the best proposals that add value in

terms of quality, capacity and delivery times, execution and prices. Wherever possible, tenders will be issued.

A business relationship with a given supplier will not be maintained, if it may mean some type of conflict of interest not reported to the company.

If you have any doubts, you should raise the matter with the Compliance Director.

All company purchases will be channeled through formal means.

We categorically reject any form of labor analogous to slavery, including exploitation, degrading working conditions, or forced or compulsory labor. Our suppliers are expected to operate in full compliance with applicable labor laws and international human rights standards, diligently monitoring their value chains to proactively prevent and combat such practices.



h) Community Relations and Social Responsibility

SONDA seeks to contribute to improving the quality of life of people in the environment where it operates. The company maintains relations of cooperation with the authorities in this respect. It does identify itself with any political thought and respects religious freedom.

The company keeps the principle of always acting with social responsibility in the communities where it operates. Employees must respect the interests of these communities and their country.

All collaborators and contractors must act in a socially responsible manner,

in accordance with high ethical standards while protecting the image and reputation of the company in joint activities with the community.



i) Environment

The company recognizes its obligation to protect the environment in which it operates.

Even if its operations do not generate a relevant environmental impact, the company will seek to implement technologies that reduce energy use and minimize the emission of pollutants.

The company is committed to the quality of life of its

collaborators, business partners and the community where it operates.

All of the company's business will be conducted in full compliance with environmental legislation, improving its operational processes and activities, within the concept of sustainable development.



The company recognizes its obligation to protect the environment in which it operates.





j) Government Bodies and Regulators

The company acts with the highest levels of integrity in its relation with the governmental representatives.

Government officials and regulatory bodies will always be treated professionally and independently. The company will make available the relevant information, data and records whenever required by law.



k) Media Relations and Disclosure of Information

The company responds transparently to public inquiries, making available all the necessary information for the clarification and disclosure of its actions, especially

when inquiries are made by the press, the financial community and the authorities, always protecting, in first place, commercial interests, due care for the security of the company's property and the necessary confidentiality necessary to ensure the social interest in compliance with current regulations.

All the information revealed to the press is precise and transparent, in agreement with high ethical standards, effective legislation and specific norms. This information is developed exclusively by authorized and designated collaborators, in order to maintain confidence in the relationship with the media and a positive image of the company in public opinion.



l) Criminal Liability

SONDA's commitment to ethical principles and transparency includes being attentive and rejecting any situation that could be related to the crimes of "Money Laundering", "Financing of Terrorism", "Bribery of National or Foreign Public Officials", "Possession of Stolen Goods", "Fraud", "Corruption" and others applicable according to the regulations of the countries where SONDA is present. In this context, the Board, collaborators and third parties linked to the company, suppliers, contractors, consultants, agents, clients, among others, are expressly forbidden to carry out any act that may constitute a crime or any conduct that result in the criminal imputation of the company. Whoever has knowledge or detects an irregular situation that puts honesty and transparency at risk,

must report these facts in a timely manner, through the available channels (www.sonda.com)



m) Bribe

SONDA strictly prohibits any offer, promise, gift, or consent to deliver a benefit of any kind to an employee, regardless of whether they are public or private, national or foreign. This prohibition extends to all forms of bribery, regardless of pretext or circumstance, and applies to all means of offering or delivering a bribe. It is not permitted for any employee to engage in bribery, even if it is presented as a gesture of goodwill. Likewise, employees must not request or accept gifts, invitations, payments, or other benefits when these compromise or could be perceived as compromising their independence, impartiality, or sound judgment in safeguarding SONDA's interests.



n) Accounting Records

Transparency is essential to enable proper evaluation of society and its business by market players. Financial Statements are accurate, complete and truthful, correctly released, with the appropriate documentation to support them.

Accounting complies with IFRS standards and principles, the law, regulations and tax records to generate reports and create a consistent and uniform basis for evaluation and disclosure of company operations. There are no parallel records or funds not reflected in the formal accounting bookkeeping.



o) Use and conservation of assets

Collaborators ensure the preservation of the company-owned assets, that is, its facilities, equipment, machinery, furniture, vehicles, etc.

Likewise, they respect and protect the intellectual property of the company on products, processes, brands, patents, technology, business strategies and marketing, data, information, research and related rights, in all its stages of development, registration and/or use, in accordance with current legislation and ensuring the social interest.

Corporate email, hardware and software are limited to professional

activities and comply with other provisions set forth in the company's policies, rules and guidelines.



p) Use and data protection

The company complies with current legislation and applies good governance practices regarding data protection, which allows it to advance in a secure, trustworthy, and integral manner. Within this framework, SONDA has implemented a General Policy on Personal Data Protection, which establishes the necessary guidelines for the appropriate management of personal data. This policy covers all operations and technical procedures related to

the collection, storage, recording, organization, processing, selection, extraction, comparison, interconnection, dissociation, communication, assignment, transfer, transmission, or deletion of identified or identifiable natural persons' data.

Its objective is to minimize the risk of unlawful acts or unauthorized processing that could affect individuals' rights.



q) Engagement with Third Parties

Responsibility across the value chain goes beyond the management of internal operations; it extends to all stakeholders involved in the business.

For this reason, SONDA has established a Third Party Due Diligence Procedure (for clients, suppliers, and candidates), to ensure that they share the ethical principles and behaviors promoted by SONDA.

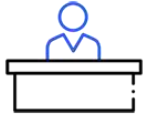


r) Ethical Use of Artificial Intelligence

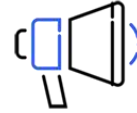
SONDA incorporates artificial intelligence into its operations to improve services and increase productivity for itself and its clients.

Its implementation and use must be governed by fundamental ethical principles and applied responsibly, in accordance with the values of this Code of Ethics. To this end, the guidelines established in SONDA's Artificial Intelligence Policy must be followed, which establishes the principles and guidelines for its responsible and transparent use.

Prohibited Conduct



To use a work position to obtain amenities or any type of favoritism for oneself or third parties.



To carry out any type of political or religious propaganda inside SONDA as a collaborator.



To internally promote non-SONDA businesses in the capacity of employee, unless it has been previously and formally authorized by whoever corresponds



Abusive conduct that intimidates or humiliates individuals, including harassment and any behavior that undermines a person's dignity or physical or psychological integrity.



Misuse of electronic means provided by the company, such as internet access, to register, send mail or files not related to professional activities, or that are detrimental to the interests of SONDA, especially those of frivolous or immoral nature.



Using our corporate social networks (LinkedIn and Instagram) for offensive, anti-inclusion comments, political issues, or to highlight issues associated with the public sector or government.

Additionally we must:



Prevent the spread of false information or fake news, as well as other harmful or unfounded information that may compromise the image and/or business of the company.



Always maintaining a sincere dialogue and informing employees about the strategies and projects of the company as long as they do not require confidentiality



Leading, assisting and to guiding employees towards the best execution of activities and to support them in their rightful claims.



Enforce SONDA's rules and regulations.



Recognize the efforts, dedication and work ability of employees, monitoring and evaluating their results.



To promote harmonious functional relationships, through transparent and reliable practices, ensuring compliance. To encourage self-esteem and respect for SONDA, the development of initiatives and creativity, as well as boosting the interest and motivation of collaborators.

V. Conflicts of interest interest

In the exercise of functions, collaborators and advisors must act in agreement to the social interest and will abstain to oppose their own interests to those of the company.

A conflict of interest exists when the personal interests of an employee or advisor influence, or have the potential to influence, the objective and independent exercise of their responsibilities, resulting in actual or potential harm to SONDA's interests.

In accordance with the foregoing, the present section comes to establish the definition, treatment and resolution of conflicts of interest that may arise in the decisions of the company.



a) Definitions



Social Interest: It is the best interest of SONDA in its own benefit, shareholders and collaborators, to always be in compliance with the applicable legislation, its statutes and other internal regulations, especially its values and corporate principles and expected conduct reported in chapter III of this Code.



Conflict of interest: A conflict of interest or conflict corresponds to a situation in which a person's private interests —such as external professional relationships, personal financial assets or others— interfere or may be understood to interfere with the performance of its functions, possibly to the detriment of social interest. It is the responsibility of each collaborator or SONDA's advisor to use their own judgment and notify any conflict of interest to the Compliance Officer.

Conflicts can fall into two categories:



**Real
conflicts**

A conflict of interest may arise when particular interest interferes with the current social interest.



**Potential
conflicts**

Situations in which, given the particular circumstances of the case, a conflict of interest can be understood or interpreted.

The perception of an eventual conflict of interest raises as much ethical concern as a real conflict of interest for what this chapter applies to both categories of conflict.

✓ *When faced with an ethical challenge, keep in mind whether it is ethical and consistent with SONDA's guidelines, whether it is legal, or whether it reflects your image and that of the company.*

b) Scope of Application

Below are the necessary guidelines to recognize and declare any circumstance that may involve a real or apparent conflict of interest.

With regard to legal compliance in this area, SONDA has implemented a policy aimed at identifying potential conflict-of-interest situations. This policy is based on information provided by Board members, Managers, and employees in areas identified as higher risk regarding their economic and personal interests, through a tool managed by the Internal Control, Risk Management, and Corporate Governance Department.

Annually and/or whenever necessary, the members of the Board of Directors and Managers must update their declaration of interest, being the Internal Control Management, Risk Management and Corporate Governance in charge of collecting said declaration from each of them.

c) Obligations

Always avoid situations of personal benefit or third parties in decisions related to the company to the detriment of social interest, both from a formal and substantive point of view, that is, to seek both an adequate solution of the conflict and to have sufficient explanations for it, in the latter case also for situations that can be interpreted as such.

In this way, social interest must be observed at all times, not only to resolve real conflicts but also to prevent them from emerging by detecting those of an eventual nature in advance.

Notwithstanding the foregoing, the Company recognizes that the existence of a conflict of interest does not, in itself, constitute ethically questionable conduct nor does it necessarily imply improper behavior. What is important is that such situations are identified in a timely manner, disclosed transparently, and managed appropriately in accordance with the guidelines established for such purposes.

The conclusion of an operation in which a member of the Board of Directors or Manager may have an interest and that reports his or her own benefit or third parties is not considered by the company as contrary to the Code as long as in said operation the corporate interest has been fully observed and the procedures intended for this purpose have been applied.

Where a conflict of interest constitutes, or may constitute, a violation of the Company's interests, the evaluation and resolution of such conflict shall be carried out by the Compliance Director in conjunction with the Ethics Committee. Without prejudice to the foregoing, all individuals are required to identify and promptly disclose any actual, potential, or perceived conflicts of interest, in accordance with the applicable policy.

"SONDA has a policy in place to identify potential conflict-of-interest situations"

VI. Diversity and Non-Discrimination Policy

a) Purpose and Scope

The fundamental corporate values and principles are established in this Code, specifically and in its chapter III. Values and Corporate Principles and Expected Conduct letters b) and f), are the following:



Corporate
Values

In SONDA, the existence of a set of principles and values has been vital, to which collaborators are encouraged to adhere, here are the main ones:



A People Company: Our goal is to build a team based on more complete and human relationships beyond mere work commitments.



Fundamental
Principles

SONDA does not tolerate prejudice or discriminatory actions based on religion, disability, ethnicity, place of birth, political choice, gender, sexual orientation or any other condition that prevents fostering an environment of respect and equality.

No acts related to sexual or occupational harassment between colleagues will be accepted, even without hierarchical links.

Thus, SONDA understands that the most human and complete relationships involve respect for diversity and prohibition of all types of discrimination and this is how it is established as part of its fundamental principles.

In this regard, SONDA has established a Diversity & Inclusion and Human Rights Policy that formalizes the Company's guidelines and commitments concerning human rights, as well as the recognition and appreciation of human and cultural diversity.

VII. Monitoring and compliance with the Code

It is the duty of all recipients of the Code to support and encourage the required values and behaviors. Without prejudice to the foregoing, the following responsible bodies are established :



a) Compliance Program Governance

The governance of the program is led by the Board of Directors, the Chief Executive Officer, the Corporate Ethics Committee, and additionally by the Advisory Council in the case of SONDA Brazil.

Conducts that deviate from ethical standards must be reported through the established whistleblowing procedure

The Corporate Ethics Committee is composed of a Board Member, an Independent Director, the CEO, the Head of People, and the Compliance Officer.

Its functions include:

- Ensuring compliance with the Code.
- To publish and to promote the wide dissemination of the Code, not only among collaborators, but also to other recipients, suppliers, clients and others.
- To clarify concerns on its application.
- To receive, to register and to evaluate information concerning the violation of the Code that arrives to their knowledge.

- To apply the correspondent disciplinary measures.
- To propose Code updates to the Board.



b) Addressing queries about this Code

If a Collaborator has questions on how to act in a specific situation regarding the provisions of this Code, their direct manager or the Manager in their area must clarify such questions or escalate the issue to higher instances.



It is the duty of all recipients of the Code to support and encourage values and required conduct.





VIII. Procedimiento de denuncia

The Company maintains a Whistleblowing Channel available at www.sonda.com. Any individual who becomes aware of, or suspects, conduct that may violate this Code or applicable laws and regulations is required to report it through this channel.

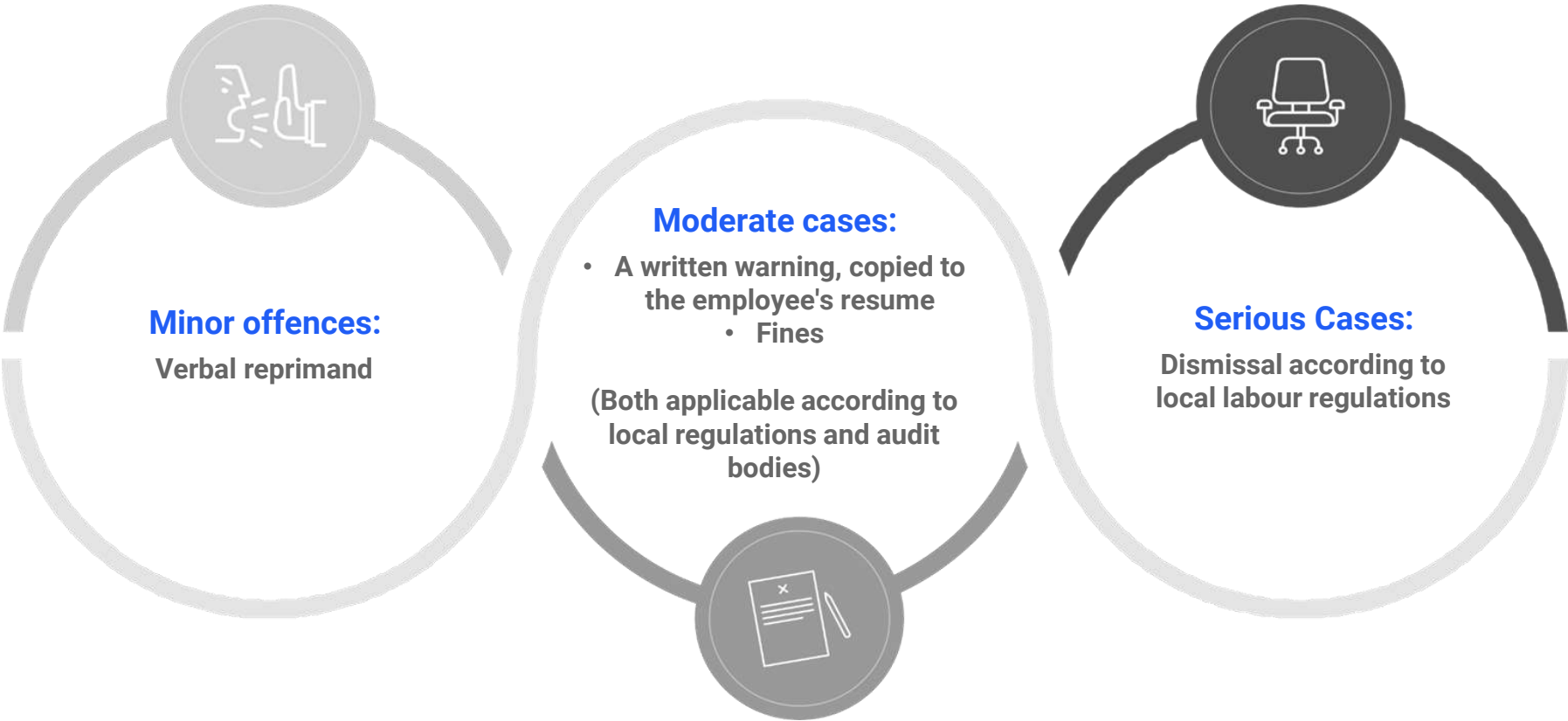
The Whistleblowing Channel guarantees the confidentiality of the information provided and the protection of the identity of individuals who report concerns in good faith. Furthermore, any form of retaliation against individuals who make a report responsibly is strictly prohibited.

For more information, please refer to the Whistleblowing Procedure available on the corporate intralink.

Employees and third parties are encouraged to report, through this channel, any situation that may adversely affect individuals, the organization, or the Company's corporate reputation.

IX. Disciplinary Measures

The Corporative Committee of Ethics will decide on the applicable disciplinary measures according to the severity of the violation of the Code, using as reference:





#SONDA
#MakeItEasy
#SoySONDA

VERSION	DESCRIPTION OF MODIFICATION	CREATED		APPROVED	
		NAME	DATE	NAME	DATE
6.0	In Section V. Conflict of Interest, positions held by employees in areas identified as higher risk have been added to the list of roles required to disclose their interests.	Valeria Salazar	Jul-26	Mónica Varela	Jul-26
5.0	- The description of item (p) "Use and Protection of Data" in Section III is hereby modified. - A new item (q) "Engagement with Third Parties" is added to Section III. - A new item (r) "Ethical Use of Artificial Intelligence" is added to Section III. - In Section VI, item (a) "Ethics Committee" is replaced by "(a) Compliance Program Governance".	Valeria Salazar	May-25	Mónica Varela	Jun-25
4.0	The change history from Version 1 through Version 4 is available in Version 5.	Valeria Salazar	Aug-24	Mónica Varela	Sep-24

