



Code of Conduct

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OUR VISION, PURPOSE, AND VALUES

VASTA

VISION: To be the primary agent in the reinvention of education for the 21st-century student

PURPOSE: To provide opportunities for students to develop their potential through comprehensive education

VALUES:

- **Excellence:** We are enthusiastic about what we do, seek elevated levels of performance, and recognize each contribution's merit.
- **Leadership:** We are leaders who inspire; we form incredible teams with a keen sense of belonging. We share ideas and knowledge to listen, accept opinions, praise, and criticize constructively.
- **Innovation:** We are obsessed with the new and everything that has not yet been thought of. We love to break boundaries, evaluate innovative ideas, and never shoot down any initiative on takeoff. We love experimenting!
- **Autonomy and Support:** We are a collective of doers who take the initiative and support each other to get even further.
- **Well-being:** We are part of a safe, respectful, and transparent environment where everyone can be their best version and exercise their full potential.

1. GETTING TO KNOW OUR CODE OF CONDUCT

What is a Code of Conduct, after all??

The Code of Conduct is a document gathering basic guidelines on responsibility, environmental ethics, and labor relations or service provision. The guidelines should serve as a guide for the conduct of our employees - from our corporate and school/academic environment - interns, apprentices, members of the board of directors and committees, students, customers, authors, suppliers, distributors, business partners, providers service providers, and other persons or companies that, in any way, may have a relationship with Cogna and its subsidiaries.

Important: In addition to the Code of Conduct, other documents should always be consulted, such as current legislation and regulation, clauses in the employment contract and/or service provision, internal policies, and different rules that may be applicable.

This Code is built with the contribution of different areas, including People and Culture, Labor and Union Relations, Institutional Relations, and Sustainability. Still, its custody, responsibility, and compliance monitoring are under the Compliance Department's obligation.

The Code of Conduct is published on the institutional websites of Cogna and its subsidiaries and made available online on the respective internal networks. In case of any discrepancy in the interpretation between the present text in Portuguese and the individual translation in another language, the spirit of the original text written in Portuguese shall prevail.

1.1. HOW SHOULD THE CODE BE EXPERIENCED?

This Code applies to all employees of the Cogna Group. The commitments of employees stipulated in this Code are, with the necessary adaptations, equally appropriate to attorneys and representatives, and suppliers who are, in some way, entitled to act in Cogna name.

Other suppliers are required to comply with this Code following the obligations arising from established qualification procedures or contracts.

Due to legal or regulatory requirements and the circumstances of the operation, policies and/or procedures that complement this Code of ethics presented here may be justified in the various organizational units of Vasta. In these cases, it will be observed.

The guidelines of this Code in everything that does not follow the applicable official standards.

Entities in which Cogna Educação S/A holds more than 50% of the voting rights or has the right to control must adopt this Code of Conduct, and non-controlled subsidiaries are encouraged to do so.

The Portuguese version of this Code is the reference document, available in the other working languages in force, if necessary.

We respect and comply with all legal and regulatory standards in the jurisdictions applicable to Cogna concerning the principle of highest demand. The Cogna Code of Conduct applies, regardless of function, geographic location, or available report, to all employees of the Cogna Group companies and all employees of its Foundations and Institutes, hereinafter also referred to as "Cogna."

The Code is a privileged tool that frames the reflection on ethics. It does not override the law and regulations – which must always be thoroughly and carefully complied with – but complements them, supporting responsible decision-making with arguments that help us to resist possible pressure, particularly when we face situations in "gray areas. Still, it supports the resolution of ethical issues since it presents standards and norms of behavior that help support our decisions."

The Code also does not replace the Policies, Procedures, and other internal documentation in each specific area of Vasta performance. Still, in general, it is an excellent guideline to support them.

On the other hand, the Code does not cover all situations that may arise for decision-making expected to be of the nature of ethical conduct. It does not give us all the answers, nor is it supposed to, and it cannot replace the careful judgment and common sense of all who work in the Company.

The Code is a guide that, indicating ways of choosing and acting, is intended to help us understand sensitive or less common situations and reject unacceptable practices, regardless of the context and other people's perceptions.

Faced with a difficult decision situation related to our way of acting in the context of the Company, we must take the following steps:

Stop to think about whether the situation in question constitutes a violation of the Code and how it can be addressed.

- Carefully reflect on whether the identified approach is consistent with maintaining the culture of integrity, transparency, and trust that Vasta promotes and what consequences it may have.
- Ask questions and ask for help from the hierarchy or other people in charge, or even,

if necessary, from the Compliance Department. In this Code, in the “Confidential Channel” section, the channels to which we can resort are mentioned.

The Code of Conduct must always be present daily, constituting a firm reference for our performance as people and professionals. This presence must be ensured through continuous training actions and to everyone available to bring the Code to the consistent interpretation of reality and help us do well.

This document is an "action guide" that reflects how Vasta understands that it should work, so its application is necessarily imperative; therefore, it is natural to recommend that employees who do not comply with the provisions of this Code are subject to disciplinary actions, under the regulatory terms applicable to the infractions committed. Suppliers to whom the Code is appropriate will also be subject, in case of non-compliance, to the measures or sanctions contractually established or resulting from.

Our Code of Conduct must be considered in all work and service relationships, whether internal or external.

Suppose you experience any situation or witness something that does not comply with the guidelines you will find here. In that case, you must immediately inform the Cogna Confidential Channel so that the response team can investigate the facts. It is worth mentioning that the Cogna Confidential Channel is the official channel of the holding that serves all companies belonging to the Cogna Group.

A company is made up of people and our commitment to always act with integrity and ethics is only possible with the responsible conduct of all. Thus, we guarantee that everything always aligns with what we believe and propagate as a company. Oh, and do not worry: all reports can be made anonymously, and any information shared is 100% confidential.

2. COMMITMENT TO OUR PEOPLE

The commitment to the well-being of our people is fundamental for Vasta, which is materialized through management policies that aim to provide elevated levels of satisfaction and professional fulfillment, ensuring a safe and healthy work environment.

In this sense, and in addition to strict compliance with national and international legislation on labor matters and the firm protection of employees' privacy, Vasta seeks to maintain an excellent social climate through the implementation of various mechanisms, such as the continuous and diversified development of skills. And technical and behavioral skills, the practice of hybrid work whenever feasible, the promotion of diversity and innovation in our environments and operations, the support for the balance of professional and personal life and corporate volunteering, the encouragement of sports and leisure activities, to mental and emotional health and quality of life programs, the creation and maintenance of adequate and collaborative workspaces, among others.

Since well-being is an essential condition for harmonious functioning, whether economic or social, Vasta maintains policies and practices that involve everyone, without exception, so that everyone feels part of a whole that is theirs. company. It is also essential to bear in mind that it is up to all of us, and in particular to each one, to find ways to live our values at work and to build good relationships and a good working environment, with leaders having a special duty to create an environment in which people can develop.

And as an employee of the Cogna Group, you are also responsible for the quality of your social relationships and the environment¹ around you.

The following topics describe our commitment to our employees and the values we hope will guide your interactions with your colleagues, suppliers, and other third parties, including our customers.

- We utterly repudiate all forms of discrimination, prejudice, intolerance, harassment, and other offensive conduct within our corporate offices, units, and schools and in activities that may take place outside these environments, including virtual ones.

¹ We understand as Company environments, all work, school, and/or academic environments, whether virtual or physical, that have a relationship with the Company.

- In addition, it is essential that we have a good relationship and, therefore, we expect that all audiences, internal or external, interact with cordiality, trust, justice, respect, ethics, and honesty.
- We are always on the lookout to ensure that our living environment complies with occupational safety, health, and environmental laws and regulations.

It is allowed to:

- i. Promote the existence of a sense of purpose in each activity, in which alignment with the individual goal can be established and which makes evident the importance of what each one does and what is their contribution to the whole;
- ii. Individually stimulate and value personal development, jointly building an environment of trust, responsibility, and mutual respect;
- iii. Actively seek civic participation, professional development towards the continuous improvement of our skills and the best possible use of the opportunities provided by Vasta;
- iv. Invest in the balance between professional and personal life by collaborating in the construction and promotion of related programs;
- v. Valuing volunteering, encouraging them to seek civic participation actively.

It is not allowed to:

- i. Tolerate behaviors, however subtle that contribute to harming well-being in the workplace;
- ii. Allow actions that do not respect the rights and diversity of each person and that constitute harassment, prejudice, or discrimination;
- iii. As a leader, preventing, in an unsupported way, mobility processes, participation in Vasta training, and volunteering actions;
- iv. Violate the privacy of employees, customers, and other stakeholders as applicable.

2.1 HUMAN RIGHTS

We support, guide our initiatives and commit to respect, act and promote, internally and externally, the principles contained in the Universal Declaration of Human Rights of the United Nations, the Declaration of Fundamental Principles and Rights at Work, of the International Labor Organization, as well as by conventions, international treaties or initiatives such as the United Nations Global Compact and the Human Rights Council Business Guiding Principles.

We believe that our employees and all individuals who interact with Cogna Educação S/A must ensure full respect for human rights. In this sense, our policies and procedures aim to:

- Have zero tolerance for child labor, forced labor, and slavery-like labor;
- Have zero tolerance for the sexual exploitation of children and adolescents;
- Make job offers fair, equitable, and following local laws;
- Guarantee the rights of migrant workers and/or refugees;
- Promoting diversity and providing equal and fair opportunities to all;
- Promote a decent, safe work environment, free from harassment, bullying, prejudice, and discrimination;
- Allow freedom of association and the right to collective bargaining for our employees;
- Provide decent and safe working conditions.
- Preserve the rights of Indigenous peoples, traditional communities, *quilombolas*, and riverside communities;
- Identify potential socio-environmental impacts and take measures to mitigate or prevent their adverse effects on people, communities, and the Environment.

It is allowed to:

- Respect and comply with the legal and regulatory norms relating to Human Rights in force in the jurisdictions applicable to the Cogna Group, having as a reference the principle of highest demand;
- Ensure the commitments voluntarily assumed in all areas of Cogna's intervention, regardless of the level of requirement of national and local legislation;
- Ensuring compliance with the commitments assumed, maintaining adequate monitoring to identify risks, and acting to avoid, minimize or repair any negative impacts arising from the Company's business and activities.

It is *not allowed to*:

- Participate or consent, actively or passively, by action or omission, in practices likely to constitute any violation of Human Rights, reporting whenever this happens;
- Accept any forms, even when subtle, of violation of Human Rights by third parties who provide us with products or provide services;
- Employ child and/or forced labor or agree with such practices by third parties in our production chain who provide us with products or services.

2.1. DIVERSITY AND INCLUSION

For us, each one has unique backgrounds and perspectives, which is why we believe in the potential of all our employees and value the diversity of origins, skills, orientations, and opinions. The more diverse people and ideas, the greater our inspiration to innovate and better understand our students, increasing our ability to serve.

We hire, retain, and promote our employees based on their qualifications, skills, achievements, and merits, and any career advancement is based on these definitions, and the results presented. No decision is made considering factors such as race, color, religion, political conviction, gender, age, origin, sexual orientation or identity, marital status, or disabilities.

Just as we encourage this conduct internally, we understand that any external action or campaign must reflect this reality. Therefore, we expect our business partners to act respectfully, and we do not accept any measure that contains offensive statements, suggestions, or images or suggests any type of discrimination.

It is allowed to:

- i. Promote mutual respect and equal opportunities in the face of diversity, providing an inclusive work environment, free from prejudice and discrimination;
- ii. Ensuring an environment where all people feel respected and safe to be who they are;
- iii. Foster the inclusion of all expressions of human diversity;
- iv. Ensuring that suppliers acting on behalf of Vasta are aware of our commitments in this area;

It is not allowed to:

- i. Determine, or condition, any type of decision based on discriminatory factors, such as ancestry, age, sex, sexual orientation, gender identity, marital status, family situation, economic situation, education, origin or social condition, genetic heritage, capacity work, disability, chronic illness, nationality, ethnic origin or race, territory of origin, language, religion, political or ideological beliefs, union membership, or even, based on the function, activity or professional category;
- ii. Discriminate, neither in the recruitment process nor at any other moment in the relationship between employees and the Company, such as training, development and professional recognition, and internal and inter-company mobility, among others.

2.2. PREJUDICE AND DISCRIMINATION

Respect must be present in all our actions, and we do not tolerate discrimination, raising our voices and using a tone of rebuke more extraordinary than due, reprimand in public, excessive rigor, disqualification, isolation, and/or threats.

2.3. BULLYING AND FORMS OF HARASSMENT

I. Bullying

The term originates in the English language and refers to all forms of violence, physical or psychological, intentional, and repetitive, conducted by one or more individuals to intimidate or assault the victim without her being able to defend herself within an unequal relationship of strength or power.

Our units have students of different ages, races, social conditions, levels of psychomotor development, genders, and disabilities. We must respect differences, encourage inclusion, and provide spaces that broaden the discussion on these topics.

Bullying is known as cyberbullying when practiced through the internet and social media. Everyday cyberbullying actions are sending intrusive messages of intimacy and tampering with photos and personal data to generate psychological and social embarrassment.

These practices are prohibited in our environments and our employees and people related to the Company who work, attend, or visit our school/academic environments, corporate offices, distribution centers, and their branches or any company dependency must also ensure that bullying is not practiced in these places.

II. Harassment

Vasta promotes a culture that is free from any type of harassment, understood as unwanted behavior, based on factors of discrimination, of a moral or sexual nature, in a verbal, non-verbal, or physical form, which has the objective or the effect of disturbing or embarrassing the person, affecting their dignity, or creating an intimidating, hostile, degrading humiliating or destabilizing environment.

Harassment, whether moral or sexual, can occur in any context or location, affecting the person regardless of their ancestry, age, sex, sexual orientation, gender identity, marital status, family situation, economic situation, education, origin or social condition, genetic heritage, reduced work capacity, disability, chronic disease, nationality, ethnic origin or race, territory of origin, language, religion, political or ideological convictions, union membership, or even, function, activity or professional category. Harassment behaviors in a business context violate the victims' labor rights, which can affect their value as people and workers and cause harm that can affect their self-esteem, physical and psychological health, life project, and family relationships. In addition to the legal obligations to which Vasta is subject, all employees must prevent, face and report behaviors that may suggest a situation of harassment.

In addition, we also repudiate any type of harassment - moral and/or sexual - inside and outside the Company's environments.

a) Moral Harassment

Any conduct, whether attitude, word, gesture, or even silence, repeated several times to the point of affecting someone's emotional balance or self-esteem, primarily when related to color, sex, sexual orientation, age, competence for the tasks function, health or social status, religion, political ideology, or nationality. You must know that moral harassment can be practiced against or by a single person and happen in diverse ways, which are:

- Vertical: practiced by managers against their subordinates or by subordinates against their superior;
- Horizontal: between colleagues of the same hierarchical level;

- Mixed: when the same person is harassed by both a superior and colleagues.

b) Sexual harassment

Sexual harassment happens when someone, taking advantage of their hierarchical status, embarrasses a person, through insinuations or explicit conduct, to obtain a sexual gift or favor; that is, it is harassment, a violation of sexual freedom.

There is embarrassment through innuendo, explicit conduct, blackmail, threat, or intimidation related to work (job maintenance, promotions, salary increases, grade changes, etc.) to obtain sexual satisfaction. We also remind you that sexual harassment is a crime in the Brazilian Penal Code.

We also understand harassment as repeated attempts without reciprocity to approach, which embarrass, offend, or harm our employees in any way, such as repeated invitations to lunch/dinner or meetings; messages sent repeatedly and unanswered; invasive and repeated questions about the personal lives of our employees.

It is allowed to:

- Refrain from behavior that could constitute harassment at work;
- Prevent and combat harassing behavior at work;
- Report situations of harassment at work that we are victims or witnesses through existing channels;
- Promote everyone's emotional and psychological safety;
- Promote awareness-raising actions on the subject.

It is not allowed to:

- i. Bullying verbally, morally, or physically;
- ii. Playing games, intentional or not, that offend groups or individuals;
- iii. Carry out aggressive and/or discriminatory manifestations;
- iv. Omit instruments, mechanisms, toys, graphic communication, and/or decoration materials from the Environment that value racial, gender, or cultural diversity;
- v. Express any prejudice and/or discrimination;

- vi. Tolerating any behavior of moral harassment, such as: systematically devaluing the work of colleagues or collaborators; promoting social isolation of colleagues or collaborators; constantly ridiculing, directly or indirectly, a physical or psychological characteristic of colleagues or collaborators;
- vii. Establish goals and objectives that are impossible to achieve or unachievable deadlines; assign inappropriate functions to the professional category of employees; justifiably assign any tasks to employees; misappropriate ideas, proposals, projects, or the work of colleagues or collaborators;
- viii. Tolerating any sexual harassment behavior, such as: repeating suggestive remarks or comments about the appearance or sexual orientation of colleagues; making phone calls and sending unwanted and sexual messages; sending animations, drawings, photographs, or images of a sexual nature; intentionally promoting unnecessary and unsolicited physical contact or approach; make hiring, professional advancement, or any other benefit in employment conditional on the unwanted activity of a sexual nature;
- ix. Retaliate complainants or witnesses of harassing behavior;

2.4. HEALTH AND SAFETY

We are strongly committed to ensuring the health, safety, and well-being of our employees, partners, and students. We treat this issue as a priority; any activity or process cannot be conducted without proper care and prevention measures. Everyone must follow the rules, procedures, and instructions related to health, safety, and well-being, aiming to prevent accidents and diseases in our facilities.

It is also the employee's responsibility to inform the infrastructure department or the management of their unit or school if they observe any installation that may pose a risk to our employees, students, and visitors.

It is mandatory to:

- i. Carry out initial health and safety integration and inform about the rules contained in the work order;
- ii. Conduct activities that are appropriately guided, trained, qualified, and authorized by the Company;
- iii. Participate in all specific health and safety training assigned to your role;
- iv. Know and comply with the health and safety procedures applied to your activity, as instructed by SESMT;

- v. Communicate all risk situations identified in the workplace;
- vi. Communicate work accidents and near misses identified;
- vii. Refusing to perform work where you are not professionally trained or where there is a risk to health and safety;
- viii. Follow the recommendations of the prevention agents - CIPA, Brigade, and SESMT;
- ix. Respond to occupational examination calls made by SESMT;
- x. Require legal health and safety requirements for all third parties working on our units;

It is not allowed to:

- i. Start your activities without having performed the initial integration by signing the work order;
- ii. Carry out activities that are not adequately guided, trained, qualified, and expressly authorized by the Company;
- iii. Refuse to undertake mandatory training for your role;
- iv. Refusing to follow the health and safety rules specific to your position;
- v. To omit the occurrence of accidents at work or to communicate them after the fact;
- vi. Exposing yourself or exposing others to a risky situation;
- vii. Refuse to stop work that poses a risk to your health and safety and that of others;
- viii. Hiring third parties that do not meet the required health and safety criteria;
- ix. Refuse to take an occupational examination when called by SESMT;

2.5. ALCOHOL, DRUGS, AND WEAPONS

We care about the health and well-being of our employees and students and, therefore, we prohibit the possession, use, distribution, or sale of illicit drugs, within our offices, units, schools, and their surroundings and in any other location. that could be considered an extension of the corporate or school/academic Environment, such as outdoor activities, events, excursions, and travel.

The same also applies to the prohibition on the distribution and sale of licit drugs to minors (e.g., alcohol and cigarettes) or their use outside the designated areas, as well as the possession and use of any type of weapon (knives, pocketknives, pressure weapons, fire, etc.) by students, service providers, and employees.

If you witness any such situation, immediately notify the management of your unit, school, or the Compliance Department. It is worth noting that the directors of us teams and schools are open and prepared to discuss, assist, and guide employees and students on alcohol and drug addiction issues.

It is allowed to:

- Consuming alcohol moderately and responsibly in the corporate Environment only during authorized celebrations if it does not affect your activities. This permission does not extend to the Company's school/academic environments;
- Consuming alcohol moderately and responsibly in the corporate Environment only during authorized celebrations if it does not affect your activities. This permission does not extend to the Company's school/academic environments;
- The use of objects is considered weapons as a work tool by service providers if they are appropriately identified, trained, and authorized.

It is not allowed to:

- Performing their duties, entering, or remaining on our premises or in external activities related to the Company under the influence of alcoholic beverages, illicit drugs, or narcotics.

DID YOU KNOW?

According to the Child and Adolescent Statute (ECA), “sell, supply, serve, administer or deliver, even if free of charge, in any way, to the child or adolescent, alcoholic beverages or, without just cause, other products whose components may cause physical or psychological dependence” is a crime! The penalty is 2 to 4 years in prison or longer if it is considered drug trafficking.

3. COMMITMENT AND PROTECTION WITH ASSETS AND INFORMATION

3.1 Preservation and care of the Group's assets

Do you know what assets are? These are the Company's facilities, equipment, vehicles, furniture, resources, and financial investments.

As well as the relationship with customers, brands, intellectual property, and information about products, services, systems, and people, should always be looked at carefully.

Depending on their role, the employee may access different resources to conduct their activities exclusively. They must not be loaned, rented, traded, exchanged, or donated without authorization. Their use must always be done with care, avoiding waste and unnecessary expenses, and respecting the standards of Work Safety and Occupational Health.

Suppose you are part of or inserted in a school/academic environment. In that case, it is also essential to encourage students to conserve the unit's heritage, preserving classrooms, libraries, laboratories, bathrooms, and other places.

To ensure the integrity of our information and assets, the disposal of assets (technological or physical), especially those that contain data, must be aligned with the Information Security area. In addition, all environmental aspects are observed in eventual disposal to guarantee the correct removal.

If in doubt, also check our Asset Management Policy.

3.2 Branding, Responsible Marketing, and Public Relations

As our contributor, you represent Cogna. As such, we expect you to maintain the brand reputation of Cogna and our Group subsidiaries.

The following requirements represent the minimum practices and standards that we expect our employees to follow.

It is allowed to:

- i. As a formal representative and spokesperson for Vasta, acting within the established limits, paying attention to consistency, coherence, and transparency in all internal and external communication channels;
- ii. Predict the impact of our statements outside Vasta, always bearing in mind the reach that the information may have in the media and social networks;
- iii. Not to involve Vasta in personal matters;
- iv. Distinguish between what it is for such an opinion and the Company's position;

- v. Ensuring that any communication about Vasta has been adequately prepared and authorized by the responsible communication area;
- vi. Inform the hierarchy and the responsible communication area about derogatory comments or opinions published in the media and social networks;

It is not allowed to:

- i. In carrying out specific duties at the service or on behalf of the Company, acting beyond the responsibilities assigned to us;
- ii. Public speaking on behalf of Vasta, unless the communications department has duly authorized this;
- iii. React to negative or derogatory content about Vasta unless we are adequately informed and empowered;
- iv. Share internal information on social networks;
- v. Use Vasta resources, such as email or personalized cards, to express private opinions or promote private businesses;
- vi. Quoting colleagues, customers, partners, service providers, or other related parties without their approval;
- vii. Under no circumstances use the Vasta brand for private purposes.

We have procedures in place to mitigate risk and identify/prevent potential violations related to protecting the Cognia brand and the Companies' brands. We expect you to follow our internal policies and procedures.

As a Cognia contributor, you are expected to interact honestly, accurately, and respectfully with all our stakeholders. You may not speak directly to journalists, media, government professionals, or any other forum on behalf of Cognia without prior permission and guidance from our Legal or Public Affairs (or the responsible department according to your Group Company's structure)).

In the following situations, you must also obtain prior permission from your Legal, Compliance, and Institutional Relations departments and your immediate manager: (i) if you participate in benchmarking meetings or trade or industry association meetings with our competitors, (ii) if you want to include, or someone asks you to have, Cognia information in a lecture or scientific article, congress or any form of presentation to external stakeholders; (iii) participation in any public event/interaction on behalf of Cognia or a Group Company.

We are committed to marketing and advertising our products and services honestly and fairly.

Therefore, when working on activities that impact Vasta advertising and marketing, you must ensure that there are adequate processes in place and that they are followed so that we comply with all applicable local and international laws (including legal competition and antitrust laws), regulations and regulations relating to marketing and advertising, not to present misleading information in our marketing or advertising materials, and to respect the intellectual property of others.

3.3 Social networks and other forms of sharing

Social media is excellent for strengthening professional relationships and sharing ideas, but it is essential to pay attention to how you use these channels, so you do not impact the Company's image; so, pay close attention:

- Before making any post, consider whether what you are writing goes against the Company's values or if the information shared is in any way confidential;
- It is always important to pay attention to the use of the brand, appropriate language, service of the image of artists/characters who have a contract with Vasta, and other recommendations for the zeal of our brands;
- You may not share photographs, documents, audio, video, messages, and other materials from the Company, co-workers, or our customers without express authorization. Before publishing this material, always check that the people in the images have a contract that authorizes us to use their image.;
- We have employees responsible for taking care of our social media, so if you come across a question from a student or any other audience, you are not allowed to respond on behalf of the Group's companies. This only does not apply if you are one of our employees qualified for this.;
- In the case of administrators of local pages of social networks, remember that you are responsible for the content published on your page.
- If you have access to any wrong, biased, or negative information about any of our brands, please notify your manager and the responsible team.;
- If you have questions about the topic, do not hesitate to contact the responsible team.

3.4 Relationships and information are disclosed to the press, investors, and the public.

We cherish a respectful and transparent relationship with the press, our investors, and the public. That is why we have some rules to make everything work in the best viable way.

It is allowed to:

- Give press interviews on any subject that does not involve the name of the Group's companies or makes use of confidential information;
- Expose your opinions on social networks, blogs, and applications, if they do not offend any person or Group and are aligned with the Company's principles and values;

It is not allowed to:

- Speak up through any communication vehicle on behalf of the Company. Suppose any media outlets get in touch asking for a statement or interview. In that case, you must notify the Institutional Communication area to check if you are authorized to speak out or receive an indication of who can do so.;
- Disclose information to shareholders or the market. This activity is carried out exclusively by the Investor Relations area so that we can guarantee transparency and alignment with the terms of the Brazilian Corporate Law and the instructions issued by the Securities and Exchange Commission. (CVM).

3.5 Data Privacy

Our commitment is to protect the privacy of our employees, partners, suppliers, customers, and students. Therefore, we can only access their data, under any circumstances, authorized employees, or those with a work-related reason for this purpose. If this happens, these collaborators are responsible for maintaining the confidentiality of the contents accessed.

Any data or information disclosure, sharing, or deletion must follow the Cogna Group Privacy Policy. In case of doubt, the Privacy and Legal departments must be consulted to ensure that our actions comply with current and applicable laws regarding protecting personal data and privacy.

3.6 Information Secrecy

The information present in information assets reflects the decisions of executives and the results obtained and expected for the business, as well as possible personal data of all those involved in the different areas of activity of the organization. For this reason, information is highly valued in all Cogna Group companies and needs to be effectively managed by all

professionals.

Any material produced or used during the work is considered confidential and must be correctly classified under the Information Classification Policy from its elaboration or review. All customer, employee, or student data and Company information must be stored carefully and never shared with anyone outside the Company. Exceptions only with formal authorization or contractual or legal determination.

As soon as an employee joins the Company, he assumes legal and moral duties of confidentiality. It is important to remember that this commitment remains even after he leaves the Company. Ah, this rule also applies to companies that end a business relationship with the Group.

It is allowed to:

- i. Hold a business or benchmarking meeting if information, data, and reports considered confidential are not disclosed;
- ii. Always maintain secrecy about privileged, confidential, and sensitive information, communicating this information only to those who are legitimately entitled to it;
- iii. Whenever we become aware of facts likely to have a material influence on the Stock Exchange's quotations and until their official disclosure: a) keep this information confidential; and b) not to trade securities of Cogna companies, strategic partners, or companies involved in transactions or relationships with the Company or financial instruments related to that;
- iv. Use the information to which we have access only within the scope of the purpose for which it was obtained, respecting the interests of the Company and third parties;
- v. Ensure the integrity of the information, protecting it against undue changes in the introduction, processing, and respective result, which causes the loss of its accuracy and/or coherence;
- vi. Promote transparency, ensuring the availability of information so that it is accessible where and when needed;
- vii. Ensure the development of adequate technical and organizational security mechanisms, reinforcing the safeguard of information confidentiality;
- viii. Protect confidential information by promoting a "clean workstation";
- ix. Update, following the internal policy, passwords for accessing computer systems

It is not allowed to:

- Pass on information about the Company's business or employees that has not been publicly disclosed;
- Keep or take ownership of materials, such as laptops, headsets, cell phones, corporate

- cards, etc., provided by the Company;
- Save or delete documents in case of a shutdown. Exceptions only with a written agreement;
 - Disclose or share confidential information of companies or business partners;
 - Retain and/or disclose any internal information after leaving Cogna about the business, research and development, customers, related parties, and employees;
 - Use internal information of the Company and/or collected from other interested parties for personal benefit or that of third parties;
 - Discussing or working with confidential information in public or even private areas where your reservation could be compromised.

Keep in Mind!

- Take care when discussing confidential matters at workstations and outside the Company;
- If you need to share any confidential or sensitive information with third parties, have a confidentiality agreement signed by both parties;
- Be careful when printing materials with sensitive information;
- Lock your computer whenever you leave your workstation.

3.7 Competence

It is only allowed to sign documents, represent, or act on behalf of any of our companies if there is any authorization from the Company to do so, following internal policies, power of attorney, articles of association, or bylaws. Always check the regulations, internal policies, and the Company's Anti-Corruption Policy.

Keep in Mind!

Respect the limits of your competence and scope when negotiating, making decisions, or contacting shareholders, public agents, students, etc. Always align the next steps with your manager before acting.

3.8 Trading in Group Shares

Did you know that we are a publicly traded company listed on B3²? This means that our company issues bonds in the market, also known as³.

You, as our collaborator, can also trade securities issued by the companies of the Group, but attention: for this, some practices must be adopted to avoid undue favoring of related persons⁴.

It is allowed to:

- Buy and sell shares and other securities issued by the companies of the Group if it respects the rules established by the CVM.

It is not allowed to:

- Use the information to which you have access to gain an advantage for yourself or others in the trading of securities;
- Trading securities issued by Group companies within 15 calendar days before the release of Quarterly Information (ITR) and Annual Information (DFP and IAN);
- Operate with options and derivatives, or conduct structured operations such as leasing shares, short sale, collar, and forward.

² B3 is the official stock exchange of Brazil, headquartered in the city of São Paulo.

³ Securities are shares, options, debentures, and any other securities or collective investment agreements that generate the right to participate, partnership, or remuneration with the Company;

⁴ In the form of the Instruction CVM 505/2011.

KEEP IN MIND!

These rules also apply to companies controlled by the Company's employees, third parties with whom they have entered into a securities portfolio management or business agreement, and any person who has become aware of material confidential information by any of our employees.

DID YOU KNOW?

The trading of securities by those who have access to information that has not yet been publicly disclosed to obtain profit or advantage in the market is a crime provided for in Law No. (CVM).

3.9 Financial Reports and Accounting Records

As an employee, you must always act responsibly, complying with the laws and regulations applicable to the topic. We keep all records of your transactions and financial statements accurately, entirely, and truthfully following accounting rules. We have a solid system of internal controls and financial reporting processes that ensure the integrity of information and the adequacy of financial reporting and public disclosure. Ah, it is not allowed to maintain parallel accounting controls of any title or nature.

3.10 Fraud

Fraud in a corporate environment happens when an employee misleads the Company or a third party to gain some advantage for himself or another person. Examples of fraud include falsifying corporate or school/academic documents, improperly altering accounting data, and allocating expenses to inappropriate cost centers.

Any such behavior, including misappropriation of Company assets or those of its customers, in addition to being a direct violation of our Code of Conduct and the terms of your employment contract, is also considered a crime.

Misuse of Vasta assets, information, and resources are unacceptable. It may be considered fraud if any employee intentionally alters, omits, manipulates, or falsifies any information or situation, resulting in an unfair and/or illegal advantage or disadvantage. Examples of fraud include, but are not limited to:

- deliberate falsification or tampering with accounting books and records, as well as other documents;
- the signing of documents without authorization or power of attorney;
- personal use of Vasta financial resources;
- presentation of bills, receipts, and vouchers that do not correspond to the services provided or contracted;
- providing false information about hours worked to receive a higher salary or avoid measures
- disciplinary for unethical reasons;
- presentation of fraudulent medical certificates.

4. COMMITMENT TO OUR COMMUNITIES

We are committed to empowering our communities, particularly those around our operations. As a Vasta contributor, you must contribute to implementing projects and strategies that improve the well-being of these communities, if appropriate, and as part of your role.

When collaborating with local communities, you must also comply with all our internal policies and procedures and ensure that the rights of these communities are respected with the social and environmental impacts of our business.

For more information, always consult the Sustainability area (or the responsible department according to the structure of your Group Company) and/or compliance.

Aware that Vasta positively impacts society, valuing not only its employees and partners but also the communities in which it operates, respecting their sensitivities and cultures. Promoting sustainable development in the regions where we are present and with the communities with which we interact is one of the pillars on which our organizational strategy and reputation are based.

We develop a culture of corporate citizenship and involvement with society through initiatives of a cultural scope, such as promoting access to education, but also of a social capacity, such as promoting social inclusion and the adoption of ways of sustainable lives, valuing inclusion and access to quality education for all. We also promote environmental initiatives, such as ecological awareness and education, the protection of natural heritage and biodiversity, and the promotion of efficiency in the use of natural resources.

You will conduct your activities on behalf of Vasta with a commitment to promoting a positive economic, social, and environmental impact in furtherance of the 17 UN Sustainable Development Goals and in line with the responsibilities voluntarily assumed by the Company.

The following requirements represent the minimum practices and standards we expect from our employees and stakeholders.

At Vasta, our ambition is to innovate and make a positive social, economic, and environmental impact worldwide.

Therefore, regardless of the characteristics of our business, we are constantly looking for ways to reduce our environmental impact and help our suppliers, communities, and other third parties to do the same.

As a Vasta employee, you must always comply with local and international environmental laws and regulations.

You must also comply with all internal Company policies and procedures and ensure that processes are in place so that we have all necessary local and international licenses to operate and that initiative-taking measures are taken in our operations to reduce our impact on the Environment and natural ecosystems.

Examples of these measures include, among others, the implementation and promotion of practices for the protection and regeneration of natural ecosystems impacted by our activities, reduction of our waste generation, water, and energy consumption, as well as reducing in the impact of our products and environmental services - considering regulatory policies and applicable legislation.

It is allowed to:

- Maintain an active close relationship with the communities in the regions where we are present, establishing regular, open, and frank dialogue, seeking to know their needs, respecting their cultural integrity, and seeking to contribute to the improvement of the living conditions of local populations;

Maintain adequate communication channels to inform citizens about the environmental impacts of our infrastructures as well as the risks and dangers of energy, whether resulting from its everyday use or misuse or the operation of facilities and equipment under its responsibility;

- Promote access to energy for communities isolated from the electricity grids, efficient use of power, and the adoption of more sustainable lifestyles;
- Recognize the rights of ethnic minorities and Indigenous peoples where appropriate;
- Always act respecting the precautionary principle when our activities may result in severe and irreversible damage to human health or the environment, even if uncertain but scientifically plausible - in these situations, we must adopt measures to avoid or mitigate these effects;
- Align our activities with national and international strategies for environmental protection;
- Promote environmental awareness by acting as mobilizing agents in the defense and protection of the Environment;
- Deepening knowledge about environmental risks and impacts of our activity to improve decision-making;
- Actively promote the development of more environmentally sustainable technologies;
- Collaborate with environmental authorities and listen to other interested parties in the search for continuous improvement of our environmental performance;
- Promote our environmental policy internally and with our partners and other stakeholders;
- Collaborate to achieve the Company's Sustainability goals;
- Promote and collaborate to reach the United Nations Sustainable Development Goals.

It is not allowed to:

- Engage, on behalf of Vasta, in social actions that do not reflect our commitments and community engagement strategies and/or sustainability strategies;
- Initiate any intervention without listening to the interested parties to assess possible social impacts and define the necessary mitigation measures;
- Use or authorize materials/products, technical solutions, and/or internal or subcontracted operational processes that jeopardize or degrade the Environment, always privileging more sustainable and economically competitive alternatives;

Ignoring or neglecting situations that jeopardize the environment, the Company's legal compliance, or circumvent the expectations and needs of interested parties;

- Make it difficult to analyze accidents or near misses of an environmental nature by denying participation or omitting pertinent information.

Commitment to our customers

Vasta purpose is to transform people's lives through education, so the student, our end customer, is the center of our attention, focused on him, the Company understands their specific and changing expectations and acts in the endless search to create solutions that guarantee your satisfaction through close relationships and strong listening skills. Customer satisfaction translates into greater loyalty and a better relationship with the Company, contributing to business volume and growth.

This customer-centered management logic presupposes the Company's undertaking commitments and considering the demanding regulatory context of the sector, Vasta has implemented, whenever necessary, mechanisms that ensure the strict fulfillment of the obligations to which it is obliged, especially vis-à-vis economically vulnerable customers, transparency in information, separation of “regulated” and “free” activities, among others.

It is allowed to:

- Valuing the diversity of identity and competence of our students, recognizing the value of cooperation;
- Provide an environment that promotes inclusion in all dimensions and that offers the best conditions for our students to be intellectually free, empowered, autonomous, and aware of themselves and the world around them;
- Understand that each member of the faculty, pedagogical and administrative team of our units and schools is an example and reference in the training of our students;
- Ensuring the quality of its activities and seeking to improve its knowledge and skills;
- Encourage our students, through concrete projects, to work in their communities, seeking improvement and long-term positive impacts;
- Promoting employability and insertion in the job market for our students;
- Produce and present honest; transparent commercial proposals adapted to the needs of current and potential customers;

Ensuring that the advertising messages we transmit do not include discriminatory elements of any kind;

- Provide relevant, truthful, and accurate information in accessible language and adapted to the needs, responding to requests, doubts, and complaints;
- Act with correctness, friendliness, and professional attitude in relations with clients, respecting their rights, sensitivities, and diversity;
- Continuously promote the improvement of our performance, as well as the quality of the products and services we provide;
- Promote the adoption of responsible behavior by customers and consumers in general, which has a positive impact on the Environment and society;
- Create and maintain simple and effective contact channels.

It is not allowed to:

- Under no circumstances should we neglect the protection of our customers' data, not collecting information for marketing purposes without express consent to do so;
- Exploit our customers' lack of knowledge or vulnerabilities to promote new products and services;
- Include derogatory messages in formal and informal communication regarding our competitors and their products and services;
- Using stereotypes that diminish human dignity in advertising and marketing campaigns.

Commitment to our shareholders:

Cogna commits its shareholders to generate value that is supported by (i) strategic decisions aimed at the sustainability of the Company's business, (ii) excellence in execution, and (iii) delivery of solid results following the foreseen.

We conduct our business ethically and transparently without jeopardizing long-term value in pursuing short-term goals.

In a complex environment in which factors such as regulation, government policies, and the evolution of markets and economies, among others, have a profound influence on the Company's performance, Cognia honors its commitments to its shareholders through an action guided by integrity and transparency.

We make the commitments below:

- Maintain an open, cordial relationship channel based on respect for each shareholder, regardless of the number of shares they hold;
- The relationship with shareholders and all communications with this public will be conducted only by the Investor Relations Officer or persons designated by him;
- Treat decisions and information relevant to negotiations with shareholders with due confidentiality until they become public;
- Inform the market, in an isonomic, transparent, and timely manner, about the Company's performance, considering the legal duties, providing, in the information provided, qualitative and quantitative elements identifying the economic, financial, social, environmental, and reputational risks, in a way complete and transparent and guaranteeing the quality of the information provided;
- It is the commitment of all employees and managers to keep confidential any information, act, or a material fact not yet disclosed by the Company to the market.
- Communicate to the market in an isonomic, transparent, and timely manner about the existence of any reality concerning the Company whose disclosure may interfere with the respective economic, environmental, or social situation;
- Respect the principle of equal treatment of shareholders and all other interested parties, providing the necessary information in an adequate, truthful, timely, and transparent manner;
- Include the risk of bad ethical practices in the general management of corporate risk, identifying the respective warning signs;
- Systematically knowing the expected economic performance of our areas of activity, seeking to contribute to achieving the goals set actively;
- Guide the Company's strategy on the best corporate governance and sustainability practices.

It is not allowed to:

- The use, by all employees and managers, of any information, act, or a material fact not yet disclosed by the Company to the market to obtain, personally or for third parties, an advantage of any nature through the purchase, sale, exchange, or negotiation of shares of Company securities.

- Under no circumstances do any acts that jeopardize Cogna's reputation, primarily acts related to financial matters, corruption and bribery, conflict of interest, and use of information and property;
- Failing to challenge the practices adopted, always in a constructive context and promoting efficiency as it proves to be of crucial importance.

5. INNOVATION & TECHNOLOGY

Innovation and technology are a fundamental part of Cogna's strategy, being decisive in how the Company manages its assets and relates to its customers and stakeholders in general. In 2017, the Company adopted the Digital Transformation strategy (Be and Go Digital), which defined that the Company should evolve in a determined way to position itself as the leader of the segment in the field of innovation.

The digital revolution is an opportunity to build a better society, where skills can be increased, and more balanced life solutions can be created in the daily way of being, in the professional context, health, and well-being in general. It is known, however, that this revolution also has new associated risks that can significantly impact the economy, people's lives, and society, and therefore also of an ethical nature.

Cogna is aware of its responsibility in this matter, unequivocally recognizing the need to ensure a careful and ethically committed management of information systems, at all stages of the information life cycle, including the design of the plans, the selection of sources, knowledge extraction, data integration, and analysis, as well as the development of analytical model algorithms.

Thus, in its activities in this field, the Company is aware of the need to conduct a systematic assessment of ethical risks, paying particular attention to the use of Artificial Intelligence in various developments to guarantee the quality of its business data and the consistent practice cybersecurity procedures.

It is allowed to:

- Promote Cogna's open innovation;
- Identify, assess, and document ethical risks in the phase before the conception or acquisition of technologies, incredibly disruptive technologies, such as artificial intelligence, robotics, or 5G;

- Ensure transparency and interpretability of the results obtained, ensuring that they are auditable and reproducible;
- Prevent, even in the design phase, ethical risk by using processes to guarantee the quality and integrity of data and methods through explicit knowledge and respective registration of the data and algorithms involved;
- Permanently monitor systems also from the point of view of their potential ethical impact;
- Foster in technology users and producers a culture of accountability for the impacts of their actions, ensuring the necessary training;
- Ensure, from the design stage of services and products, the incorporation of ethical criteria in decision-making, aiming at the applicability of digitalization concepts for the benefit of society in general and guaranteeing proportional human control in all autonomous and critical systems;
- Promoting scientific employment that allows attracting people with very specialized knowledge in modern technologies and simultaneously defending their retention in the market;
- Promote diversity, especially female empowerment in technology and innovation careers;
- Ensure the security of data, systems, and analytical models, considering the potential risks associated with a security breach, fully complying with the Company's information security policy and standards;
- Determinedly promote the development of employees to adapt to technological change, encouraging the necessary training, reconversion, and adaptation and creating qualified roles for professional careers sensitive to technical and ethical risk.

It is not allowed to:

- Allow the development of analytical systems or models that promote or result in some type of injustice or discrimination;
- Ignoring signs of ethical impacts caused by any technology in use and not reporting them.

6. INFORMATION SECURITY

Technology is present in our daily lives through various resources: software, hardware, tablets, notebooks, computers, smartphones, etc. Any files created, received, or stored on this electronic equipment or Company systems are our property.

In compliance with the LGPD (General Data Protection Law), Information Security training is mandatory for all employees, performed through the UK Portal, with evidence of the certificate of completion.

Therefore, it is our responsibility to ensure that all information and documents are safe and stored in environments approved by the Information Security area. It is not allowed, for example, to save files or information on a pen drive, personal clouds, and any other external device or send them to personal emails, yours or third parties, without the sending being linked to the normal development of your activities.

Take care of our physical spaces too! Do not leave the doors of our offices open or allow third parties to enter our perimeter without proper identification and authorization.

Each employee's responsibility is to ensure the integrity and confidentiality of their credentials (user account and password) for access to the COGNA Group's information systems. All passwords are personal and non-transferable and are treated as confidential and confidential company information, remembering that they should not be shared with anyone.

If you have any questions on this matter, please consult the Information Security Policy.

6.1. Passwords to access systems and emails

All passwords to access systems and email accounts used in the Company are personal and confidential. When you receive any credential, you are civilly and criminally liable for all actions taken through your access. So do not share it or leave your credentials visible and unprotected in any situation.

With this, we guarantee the security of our systems and avoid the occurrence of unwanted situations.

E-mail, internet, and electronic communication

The use of email, the internet, and any electronic communication in the Company must be done for professional purposes. If you need to use it for some personal reason, it is good to keep in mind that this should be brief and cannot impact the ability of the Company's technological resources to work. It is prohibited to use electronic media for games, exchange, or storage of obscene, pornographic, violent, discriminatory, racist, or defamatory content, commercialization of products and activities prohibited by law, this Code, or the Information Security Policy.

It is worth remembering that the transfer of information from the Company to private emails of employees, service providers, or third parties is not allowed.

KEEP IN MIND!

If you have questions about the program you want to install on your device, consult the Information Security department.

6.2. Use of non-Company technological resources

We provide our employees and third parties with the necessary technological resources according to their functions. Therefore, we do not authorize the use of personal devices. Suppose you need them to perform any activity. In that case, you must contact the Information Security department to request validation and the release of use. Stay tuned for the Code of Conduct and Information Security Policy rules.

6.3. Third-Party Network Use and Traffic

If a third party needs access to the Company's infrastructure, dependency, or network, the manager responsible for hiring must contact the Information Technology and Security team and CKS to request the release.

7. RELATIONSHIP WITH THIRD PARTIES AND CONTRACTING SUPPLIERS

In our day-to-day, we are always in contact with third parties, whether they are suppliers, service providers, customers, or public agents, among others. In these interactions, all decisions must be taken in our business's interest and comply with legal, labor, and environmental requirements that must always be aligned with our Code of Conduct and Company policies.

7.1 Contracting and Relationship with Suppliers

Our cooperation with suppliers is essential in our journey to positive social and environmental impact.

However, suppose we engage with suppliers that do not operate in a manner consistent with our values and approach to integrity, responsible sourcing, quality, and supply chain management. In that case, this can also place our brand and resources at an unacceptable level of risk.

Our decisions on purchasing products or contracting services must be in line with the Procurement Policy and based on quality, price, conditions and maintenance, and the interest of our business and sustainability strategy. We encourage the preference for socially responsible suppliers committed to the causes of social, environmental, and community transformation defended by the Company.

As such, we expect you to follow our internal policies and procedures to protect Platos values, interests, and image when engaging with a supplier. You must comply with local labor laws, practices, and regulations and Third-Party Procurement and Auditing Company procedures and policies.

Our suppliers are expected to operate ethically and follow the Company's Code of Conduct, as provided in the contract, and all applicable laws and regulations, including anti-corruption rules. As such, we expect you to report any potential violation of this Code by one of our suppliers.

These reports will be evaluated, and the names of the complainant will be kept confidential to the extent permitted by law.

It is allowed to:

- Select suppliers based on Cogna's policies and procedures that include clear, unbiased, and pre-determined selection criteria – ethical, technical, and economical;
- Ensuring compliance by suppliers with health and safety standards and practices, environmental rules, labor legislation, and Human Rights, particularly, a) Eradication of forced or compulsory labor; b) Eradication of child labor; c) Combating the sexual exploitation of children and adolescents; d) Guarantee of the rights of traditional communities, such as indigenous, *quilombolas* and riverside communities; e) Guaranteeing the rights of migrant workers; f) Respect for Human Rights by private security agents; g) Commitment and engagement with the promotion of diversity;
- Encouraging engagement with local suppliers, when applicable, in promoting regional economic development;
- Respect the identity of each partner, but demand that they fulfill, when entitled to act on behalf of Cogna, the duties stipulated in this Code;
- Guarantee the confidentiality of suppliers' information and respect their intellectual property rights;
- Prioritize the hiring of local suppliers to promote the regional economy, as applicable;
- Be careful that suppliers do not become economically dependent on Cogna, taking the necessary preventive measures;
- Receive gifts or promotional items with a maximum value of R\$100. The employee must inform the Compliance department to assess the situation if the gift or promotional item exceeds this amount.

It is not allowed to:

- Accepting to participate in supplier selection decision processes that may generate situations of potential conflict of interest;
- Imposing abusive conditions on suppliers or failing to comply with agreed requirements, namely in terms of payments;
- Maintain partnerships with suppliers that do not respect the ethical commitments they have assumed before Cogna;
- Receive gifts, gratuities, or any personal advantage that may generate conflicts of interest, regardless of the amount.
- Make referrals to customers, even if requested by them, of suppliers or companies that may be indirectly related to the Company's business.

- Hiring companies where the employee has a financial interest or maintains an effective relationship with the potential supplier without paying attention to the previously indicated rules.

Keep in Mind!

All Company contracts must be sent for validation by the Legal department. This does not have to happen in the case of standard minutes made available by the Legal department, but it is essential to always pay attention to your powers and scope to close the contract.

7.2 Public administration

Public administration is the entire structure and organization of public power: unions, states, municipalities, agencies, companies, and general agents. We do not allow, under any circumstances, the attempt to obtain any kind of advantage with the Public Administration, and all employees and third parties related to the Company are responsible for ensuring that their actions follow our Anti-Corruption Policy and Code of Conduct.

It is essential to clarify that corruption is any act that involves the promise, offer or direct or indirect delivery of money or other benefits to influence, obtain, or reward any illicit advantage for oneself, for third parties, or the Company. We may use as examples of other benefits: gifts, travel, meals, scholarships, discounts, payment authorizations, favors, and hospitality.

Remembering that our Anti-Corruption Policy is available to all employees, suppliers, and students, among others involved, and provides more details and valuable information regarding the relationship with public entities.

It is allowed to:

- Anticipate and clarify situations that may constitute or be understood as corruption or bribery;
- Respect, in the relationship with employees and those responsible for public entities, the duties of exemption to which they are subject, avoiding any action that, directly or indirectly, has a fraudulent, coercive, manipulative, or misleading influence, and refrain from giving or promise any kind of benefit that is not due to them;
- Make known, comply with, and enforce internal rules on facilitation payments, political contributions, donations, and sponsorships;

- Comply with internal rules regarding due diligence in identifying and analyzing the integrity (Integrity Due Diligence) of third parties before establishing business relationships, ensuring the adoption of the foreseen and applicable risk mitigation mechanisms;
- Report any alarm signals or actions associated with a potential act of corruption, bribery, and/or other illegal acts on the appropriate channels.

It is not allowed to:

- Hiring intermediaries suspected of committing any act of corruption for their benefit or that of the Company;
- Making contributions or donations to charities in exchange for favors with any public agency, even if the recipient is a genuine charitable institution;
- Accepting or offering gifts, gifts, loans, hotel stays, personal services, or other gratuities, even if in the form of preferential treatment from customers, suppliers, government authorities, or any other person or entity connected with the Company's business, which may come to result in any type of improper obtaining of personal advantage, for the Company or third parties;
- Accept or offer any patrimonial advantage or its promise in return for any act or omission contrary to the functions performed and/or when such benefits are not due;
- Make, on behalf of the Company, monetary or other contributions to political parties;

7.3. Competitors

All negotiations with customers, suppliers, distributors, competitors, and third parties must be done relatively and loyally, respecting free competition.

We do not adopt practices that damage the image of our competitors or hire employees from these companies to obtain confidential information about their businesses.

It is also essential to consider that competition legislation has its requirements and restrictions, and that non-compliance is subject to heavy sanctions, which may have collateral effects on the credibility and reputation of institutions.

The requirement to comply with the highest ethical standards and the expression that Cogna has, whether in terms of the areas of activity in which it operates in the energy sector or in terms of the regions in which it is represented, gives it a significant responsibility in this matter, as integrity and good reputation in business practices are decisive for strengthening the trust of its customers.

Thus, Cogna seeks to act in full compliance with the best practices of healthy competition, taking on the training and updating of its employees on national and international competition legislation and prohibiting any rules that restrict competition, even in countries where there is no legislation in this matter.

It is allowed to:

- Maintain personal relationships with employees who collaborate with competitors of the Group if matters involving confidential information from us or the competitor in question are not discussed;
- When there are doubts about the ethical compliance of the behaviors practiced or observed in terms of competition - whether in the relationship with competing companies, customers, or suppliers, in representation functions in professional or sectoral associations, and in the analysis or construction of proposals for mergers, acquisitions or bilateral agreements, among others – to advise us with the competent entities in this matter in the Company, always maintaining an attitude of integrity and prudence;
- Take particular care in the oral and written communication about the Company's strategic information, namely in terms of effective prices, quantities, customer portfolios, business volumes, production costs, investments, and sales, among others, to ensure that they do not raise doubts about the compliance of what is communicated with competition rules and the required ethical standards are not called into question.

It is not allowed to:

- Access information that has not yet been made public, such as drafts of bidding documents or prices charged by competitors;
- Agree on prices with suppliers or exclude a competitor from participating;
- Exchange confidential information with competitors;
- Adopt any practice prohibited by competition law;
- Use, under any circumstances, information about competing companies obtained by illegal means or that induces the violation of the legislation in force.

WHAT SHOULD I DO?

If you are asked to talk about values that will be practiced in any bidding process, make it clear that you are not authorized to discuss the price of our products, politely end the conversation, and report the occurrence on the Cogna Confidential Channel.

7.4. Trade unions and class entities

We respect the work of professional unions and the principles of freedom of association and association.

We respect the work of professional unions and the principles of freedom of association and association.

Contact the Union Relations team if you need to talk about a subject related to this topic.

7.5. Donations and Sponsorships

Donations are contributions made voluntarily, without expecting any return or counterparts. Failure to comply with this guidance may generate tax and administrative consequences for the Company.

Sponsorship, on the other hand, occurs when the Company's name, image, products, or services is disclosed in events, activities, sports, or cultural entities. Except for advertising and marketing actions, sponsorship activities must be intended for non-profit institutions that develop activities related to research, education, culture, sports, or social programs.

Requests for sponsorships and donations involving Public Administration entities and/or government incentives must be forwarded to the Sustainability area, responsible for their evaluation. They must contain a well-defined description of their purpose and target audience. Whether incentivized or not, all donations or sponsorships are evaluated following the current internal policy. For more information, consult the Donation and Private Social Investment Policies.

It is not allowed to:

- Offer, promise, or deliver donations and sponsorships on behalf of the Company to any entity, public or private, without proper internal authorizations. The process for granting donations and support must be transparent and properly documented;
- Negotiate or authorize the payment of amounts to third parties who are not the final beneficiaries of the sponsorship or donation.

WHAT SHOULD I DO?

Question: The public entity contacted me and said it would only renew the contract for the supply of education systems with the Company if we agreed to pay a certain amount in the form of sponsorship.

Answer: Sponsorships are a form of publicizing our brands and products and should never be used as a counterpart to obtain personal benefits or for the Company. Under no circumstances make promises or make commitments in cases like this. If you go through a comparable situation, inform that all sponsorship requests must be formalized and analyzed by internal sectors.

8. CONFLICT OF INTERESTS

A Conflict of Interest is an actual or perceived conflict that may arise when your personal, family, social, or political activities and relationships interfere or have the potential to interfere with your responsibilities and duties to Vasta or interfere with the obligations we have as employees, or partners. Any conflict of interest may harm the reputation of the Company, employee, or partners involved.

For Vasta, the basic rule is transparency. This means recognizing and disclosing all situations that create, or appear to make, conflicts of interest between our interests and the interests of Vasta.

The Company undertakes to develop and apply internal rules to prevent conflicts of interest and make the best efforts to ensure that mechanisms for their prevention are guaranteed in transactions in which it participates. Vasta has policies and procedures that ensure impartiality and impartiality in its performance and decision-making processes in situations of potential conflict of interest involving the Company, employees, or partners.

Our employees and people who work directly or indirectly for the Group must always act with a focus on the Company and our customers, avoiding any situation that could lead them to make decisions motivated by other interests. Therefore, conclusions cannot be influenced by opportunities for financial gain or other benefits, actual or potential, for you or third parties.

You must avoid any actual or apparent conflict of interest between your interests and the interests of Vasta, and you must not use your position with the Company to obtain undue advantage or benefit, directly or indirectly, for yourself, any other business or person related to you, or any other third party.

Common examples of conflicts of interest can include:

- Having another occupation outside of your role at Vasta that negatively affects your performance or interferes with your duties as an employee of the Company;
- Serve as a member of the Board of Directors of any organization or work as a consultant, advisor, administrator, or executive of any organization without seeking prior approval, as instructed in the Company's conflict of interest policy;
- Own or invest in franchises (poles) of any Cogna Group Company;

- Use confidential or privileged information for your benefit or that of a third party;
- Receiving any personal help from a supplier, customer, competitor, or any other organization attempting to do business with Cognia or any Group Company;
- Hire a supplier at Cognia in which you have a direct or indirect undisclosed financial interest;
- Hire or have a direct or indirect line of communication with a relative or someone with whom you have a close or affective relationship;
- Engage in or engage in activities that compete, or would appear to compete, with the interests of Cognia or any individual Group Company;
- Not keep your political activities separate from your activities at Cognia or at any unique Group Company, including using company assets and resources and providing direct or indirect political contributions to it;
- Failing to immediately report any real or apparent conflict of interest you have identified.

It is allowed to:

- Always act so that our interests, family interests, or those of third parties related to us do not prevail over the interests of Cognia and its stakeholders;
- Communicate to the hierarchies and distance ourselves or promote the removal of the respective decision processes in all situations that may generate conflicts between personal interests and the duty of loyalty towards the Company, such as family relationships or similar in hierarchical dependence or direct functional; exercise of external professional activity that interferes with our attributions or with the activities of the Company; ownership of legal, patrimonial or family positions susceptible of interfering with the interests of the Company or with the activities carried out;
- Be aware that there are limitations to the transaction of goods and the contracting of services by Cognia to related parties, so we are bound to comply with the applicable internal rules;
- Know the procedures for the prevention, identification, and resolution of relevant conflicts of interest, when covered by the Conflict-of-Interest Regulations and transactions with related parties of Cognia;

It is not allowed to:

- Using information to which we have access as Cogna employees in situations of personal gain to obtain unique, family, or friend benefits;
- Develop other professional activities during the work period;
- Exercising external professional activity, with or without remuneration, which jeopardizes the fulfillment of our professional duties or Cogna's activities or interests, especially negotiating for our account or someone else competing with the Company;
- Involve the Company in our actions in a personal capacity, in partisan, political, religious, or sectarian positions of any kind.

For more information, consult the current policies and the Compliance Department.

8.1. Affective relationships and kinship relationships

We have a large team spread throughout the national territory, and we understand that it is normal for kinship relationships to exist⁵ or even for relationships to arise between co-workers.

It is allowed to:

- Having a kinship or affective relationship with another employee if there is no hierarchical subordination or influence in management decisions between them. If this happens, inform your manager and the Compliance Department so that the case can be evaluated and, if necessary, a reallocation of the area can be performed.

It is not allowed to:

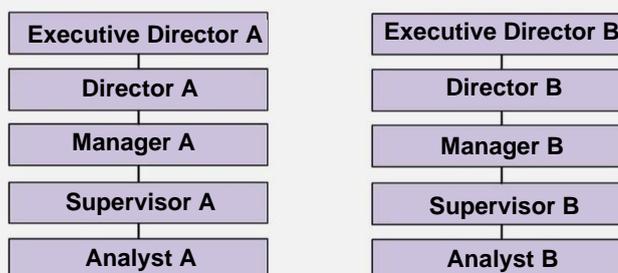
- Intervene in the process of hiring or evaluating someone with whom you have an affective or parental relationship;
- Hide the existence of an affective bond or kinship relationship between you and another employee in the same hierarchical chain;
- Disclosing or sharing confidential information with the relative or partner;
- Demonstrations of affection that may cause embarrassment in the work environment;

⁵ We understand as relatives: children, stepchildren, grandchildren, and great-grandchildren; spouses/partners, in-laws, brothers-in-law, sons-in-law, daughters-in-law, parents, stepfather, stepmother, siblings, nephews, and great-nephews, grandparents, uncles and cousins, great-grandparents, and great-uncles.

The affective or parental relationship between employees who occupy positions in which they conduct control, audit, or follow-up activities in other areas and the employees of the departments served. Examples of these cases are the areas of Finance, Internal Controls, Audit and Compliance, and Human Resources.

Keep in Mind

A hierarchical subordination or chain exists when a member of column A or B is related to a member of the same column. There is no hierarchical relationship when someone in columns A and B has a relationship. Please inform your manager and compliance to analyze the case if this happens.



When we talk about our school/academic environments, we must emphasize that all our employees, regardless of their position, exert considerable influence over our students. This interaction with students, regardless of age, should always be based on a position of trust and authority.

Their functions must be conducted to guide them in their school/academic learning and social life and never for activities that go against the principles and rules of this Code, the Internal Regulations of each school or college/university, and the legislation Brazilian.

If you are inserted in the school/academic environment, it is essential to highlight that some specific behaviors are not allowed:

- The affective relationship between directors of our schools and faculties with any employee of the unit or school;
- The affective or parental relationship between a teacher and the coordinator;

- Inappropriate affective relationships and manifestations between student and employee (faculty, pedagogical or administrative staff), including sexual relationships, even if consensual;
- Efforts and investments by students and employees, inside and outside the school/academic environment, including through virtual tools, such as social media.

8.2. Parallel Activities

Parallel activity is when an employee has some other professional training or occasional work outside the Company, whether paid or not. Employees who develop activities in competitors, such as teachers, must inform and formalize the situation by emailing their direct managers.

It is allowed to:

- Having similar activities outside working hours, if they do not harm their performance at the Company or conflict with the interests of the Group or with its activities.

It is not allowed to:

- Be a collaborator of the Company and provide services in an outsourced manner to companies of the Group, even though a company of which he is a partner;
- Have direct involvement in decisions on granting contributions and in establishing contracts if working in a non-profit entity;
- Function as a director, consultant, or representative of a competitor or in business related to the field of Education.

8.3. Political Involvement

We recognize the importance of our role in society as an education company and encourage political debate if done democratically and peacefully. We do not tolerate discrimination based on choice or partisan involvement.

Upon entering the Company, every employee must inform if there is any framework in the concept of Politically Exposed Person⁶ and explain the details about the condition.

⁶ Politically exposed persons are public agents who perform or have performed relevant public positions or functions in the last five years, as well as their representatives, family members, and close collaborators, in Brazil or abroad.

If any employee wants to run for public office or has any effective or potential participation in any public body, the Compliance Department must be notified.

It is not allowed to:

- Using your relationship or position in the Company to propagate political works and ideologies;
- Use assets or proprietary information of the Company to make any political contribution – direct or indirect – to a candidate or political party;
- Request reimbursement, directly or indirectly, for any political contribution or to participate in political events;
- Political lobbying or reimbursement, directly or indirectly, for any political contribution on behalf of the Company.

8.4. Gifts, Giveaways, and other Hospitalitys

When we talk about gifts and hospitality, we refer to all contributions, meals, travel, or entertainment packages offered by our business partners to our employees or the Company to third parties, regardless of their value.

We repudiate all forms of corruption, bribery, or extortion. Therefore, this exchange must be conducted transparently and carefully, in line with the Anti-Corruption Policy and internal policies.

Gifts worth R\$100 must not be offered to third parties or received. If you experience any such situation, politely decline, or return what is provided. Donations above this amount may only be accepted with written approval from the Compliance Department. If the return may cause embarrassment, forward the gift to the Compliance Department, which will donate or promote an internal raffle with the gift in question.

Travel, meals, and other expenses necessary to conduct your professional activities must be appropriately approved, have a business purpose, comply with our policies and procedures, and cannot be characterized as a real or apparent conflict of interest or occur in exchange for an advantage undue.

As an employee, you are responsible for maintaining records and the accuracy of the information in expense claims and advance payments. You cannot pay for public officials' travel, meals, and other expenses, without their immediate manager's prior written approval and with the Compliance Area's consent.

Cogna allows employees to offer or receive meals from Third Parties, provided that these meals (i) are related to the active conduct of business, (ii) are not intended to influence any commercial decision improperly, and (iii) that the amount does not exceed the limits outlined in the gifts, gifts, entertainment, travel, and hospitality policies of your Group Company.

KEEP IN MIND!

The request for approval to receive gifts with values greater than R\$100 must contain the donor's name, nature of the gift, circumstances of the offer and acceptance, and approximate value of the gift.

It is allowed to:

- Accept invitations to lectures, training courses, or seminars, without the restriction of value, if they are approved by your immediate manager and by the Compliance Area. If the invitation has costs related to tickets or accommodation, these must be subsidized by the invited area, with the express authorization of the area director and the Compliance Area.

It is not allowed to:

- Request for yourself or third parties, gifts, sponsorships, discounts, gratuities, or any other personal advantage for business partners, even with a value lower than R\$100.00;
- If you work in the Supplies department, accept, and offer any gift or hospitality, except for low-value institutional gifts that contain the partner's logo, such as pens, agendas, or calendars;
- Accept or offer gifts and hospitality from public agents or people related to them, regardless of the amount;
- Accept gifts or hospitality that have been offered in exchange for any undue advantage.

9. ETHICS AND INTEGRITY IN BUSINESS

You will conduct your business activities on behalf of Cogna with transparency, integrity, and commitment to the highest standards and practices of ethical conduct and will not be involved in illegal activities or conduct.

We recognize and comply with laws wherever we operate. Therefore, this Code will not differ from local laws. In the event of inconsistency, you will only abide by the standards in this Code if they are more stringent than applicable laws and regulations.

If you have any questions or are unsure of which laws apply to you and your location, do not hesitate to contact your local Legal Department for assistance.

While it is a considerable effort for anyone to be aware of all aspects of each applicable law, the following requirements represent the minimum practices and standards we expect our employees to follow.

9.1. Compliance with Anti-Corruption Laws

We have a zero-tolerance policy for any form of public or private corruption, including but not limited to bribery, embezzlement, extortion, illegal dealings, and facilitation payments made by our employees or third parties in the conduct of our business.

You will comply with all applicable local and international laws, regulations, and rules relating to anti-corruption matters where we do business, including the Brazilian Clean Company Law and the Foreign Corrupt Practices Act (FCPA). These requirements are addressed in Cogna's Anti-Corruption Policy.

As an employee or with or through any third party acting on behalf of the Company, you are prohibited from participating in any corrupt activity and from the offering, promising, providing, or authorizing, directly or indirectly, any person to give money or anything of value to a Public Official or any private individual or legal entity to obtain or maintain any undue advantage.

For more information, see the Company's Anti-Corruption Policy.

9.2. Compliance with Anti-Money Laundering Laws

Cogna's operations are guided by high ethical standards, business integrity, and strict respect for and compliance with current legislation and regulations relating to the prevention of Money Laundering and the fight against the financing of terrorism. In these terms, Cognia adopts the necessary procedures to know the identity of the relevant counterparties of the deals it intends to conduct. It only concludes such agreements if it does not identify indications of irregularities.

Cogna has a set of policies and procedures that encompass measures to respond to the legal duties and requirements associated with these matters, namely Due Diligence (DD) or Know Your Customer (KYC) procedures. Such policies and procedures establish concrete measures that must be adopted to comply with all legal and regulatory obligations to which Cognia is bound, considering the distinctive characteristics of the different business areas and the potential risk of Money Laundering and terrorist financing.

To ensure the practical application of the procedures defined in this scope, a governance model was systematized, and distinct roles and responsibilities to be respected in fulfilling the legal duties to which Cognia is bound were defined.

We comply with all local and international anti-money laundering laws, regulations, and standards applicable to our locations and have procedures to mitigate the risk of money laundering activities and identify and prevent any wrongdoing.

All our employees must comply with all laws and regulations related to this matter and act to effectively prevent and monitor the direct or indirect occurrence of these practices in Cognia's business chain.

Therefore, you should be on the lookout for warning signs such as:

- purchase requests that are not in line with the supplier's regular business activity;
- requests for large cash payments or other unusual means of payment;
- cash transfer request, or
- other forms of compensation to countries are not included in the commercial contract.

It is allowed to:

- Identify/know our counterparties, including the respective beneficial owners, before entering any business or transaction to ensure that we are working with legitimate counterparties and whose origin of the funds does not come from criminal activities;
- Report all suspicious situations and/or that raise doubts as quickly as possible, through the channels defined internally and maintain strict confidentiality about them;
- Regularly review the identification elements of the counterparty and ensure that the funds involved continue to have a lawful origin;
- Only receive and make payments to and from entities previously subject to Due Diligence (DD) or Know Your Customer (KYC) internal procedures and with which we have duly authorized contracts under the terms of the respective internal processes.

It is not allowed to:

- Initiate a business relationship or carry out any operation with the suspicion that the counterparty participates in Money Laundering or terrorist financing practices, or any other illicit act;
- Accept cash payments. However, when there is no other possibility, we will always have to respect the maximum amount legally authorized, and we must first obtain authorization from the responsible management;
- Make payments without the respective authorizations and prior knowledge of the counterparty and associated transactions.

9.2.1. International Trade

We comply with laws that regulate trade and sanctions that limit our ability to do business with certain countries, companies, and individuals.

It is allowed to:

- Comply with trade regulations in the markets in which we do business;
- Comply with all import and export laws that regulate the transfer of products, information, technologies, and services, including licensing and customs requirements;
- Act following sanctions and economic embargoes that prohibit or restrict certain countries, companies, and individuals.

For more information on trade compliance, consult your Group Company's trade compliance policy and your Legal and/or Compliance departments.

9.3. Compliance with Antitrust Laws

We comply with fair competition laws as we conduct our business ethically, do not use unfair practices to win any business, and seek to promote fair competition in the markets in which we operate. As such, we aim to prohibit anti-competitive conduct and abusive practices that may constitute economic violations and/or unfair competition, always striving to be transparent and fair. Violations of antitrust and fair competition laws may result in severe penalties for Cogna and our employees.

As a Cogna employee, you must:

- Comply with all applicable fair competition and antitrust laws;
- Using legitimate means to obtain information about our competitors;
- Respect the confidential information and intellectual property rights of our competitors and other Third Parties; and
- Obtain legal approval in the case of corporate transactions (e.g., mergers, acquisitions and joint ventures, and other associated agreements).

10. CODE OF CONDUCT AND DISCIPLINARY MEASURES

Our Compliance Program is based on the pillars recommended by the Ministry of Transparency and the Comptroller General of the Union (CGU): commitment from top management, responsible and independent authority, profile and risk analysis structuring of rules and instruments, and continuous monitoring.

The Program is part of the Compliance Department, which, in addition to other activities, is responsible for:

- Analyze complaints through the Confidential Channel, emails, among others, conduct the necessary internal investigations and, together with the Union Relations and Human Resources departments, recommend actions for each situation;
- Ensuring that the decisions adopted for each case are implemented;
- Periodically assess the risks of unethical conduct to which the Company is exposed and review the Code of Conduct to ensure that it is always aligned and updated with the Company's activities and with society's moral and ethical principles;
- Publicize the Code of Conduct through training and communication programs in internal channels to ensure that the document is understood and experienced by all;
- Clarify doubts about the Code of Conduct and the Company's internal policies.

KEEP IN MIND

The Company's Internal Policies should always be consulted, as they complement everything you have seen here. If you cannot find any specific policy or have any questions about a particular topic, contact the Compliance Department.

10.1. Communication Channels.

Suppose you observe or suspect a situation that violates the law or is not following our Code of Conduct or internal policy. In that case, you must report this matter immediately to the Cogna Confidential Channel.

A third-party company manages the Channel, and all complaints are received and treated with confidentiality and can be made anonymously or identified.

If you have questions about an issue, you can seek advice from your line manager or consult with the Human Resources and Compliance departments.

Ah, remembering that this Channel includes all the companies of the Group.

COGNA'S CONFIDENTIAL CHANNEL

To report a situation, go to <https://canalconfidencial.com.br/cognaedu/>.
The progress and conclusion of the investigation can be followed through the protocol generated by Cogna's Confidential Channel.

10.2. Complaints and Investigations

All reports received through the Cogna Confidential Channel or other means of communication are taken seriously and treated with absolute confidentiality. All accounts are known only to the areas involved, and complaints can be anonymous or identified. Even if the option with identification is chosen, the complainant's name will always be preserved by the areas involved.

While investigating complaints, the Compliance Department may conduct personal interviews with those involved, directly or indirectly, in the report and is authorized to adopt the working methods it deems necessary for the investigation of the facts, always respecting the privacy of those involved. If you are asked to contribute to any findings, please be transparent in responding to inquiries and provide all requested information.

In the investigation, the analysis of all files saved on professional devices - such as cell phones, computers, and tablets - of professional emails sent, received, or deleted, images of the internal security circuit, the professional history of those involved, of various pertinent documents and the level of repercussion and impact of the alleged misconduct.

Depending on the complexity or severity of the report, it may be necessary to hire a specialized service provider to support and conduct the investigation.

If, after the investigation, the report is confirmed, the corrective and/or disciplinary actions defined by the Company together with the Compliance Department, Union Relations, Human Resources, and the accused's manager will be applied. If you report an alleged violation in which you participated, your self-report and cooperation will be considered when defining the applicable measures.

Suppose a member of the Compliance Department is mentioned in the report. In that case, the third-party Company responsible for screening the information will report directly to the director (a) of HR Cogna, who will be responsible for the investigation independently.

We do not tolerate retaliation against those who use the Cogna Confidential Channel to report a situation. If this happens, immediately inform the Cogna Confidential Channel using the protocol number already provided or contact the Compliance Department by email at compliance@cogna.com.br.

KEEP IN MIND!

Reports on the Cogna Confidential Channel should only be made for genuine concerns. Announcements made in bad faith, with false and/or malicious statements, will be forwarded to the Compliance Department, which may apply disciplinary measures at the end of the analysis.

Corrective and Disciplinary Actions

Violation of the rules of this Code of Conduct, of the Company's internal policies, or even of current legislation, by the action or omission of an employee or a third party, after the facts have been verified, may result in the following measures:

Engage an employee:

- Verbal warning;
- Written warning;
- Suspension;
- Termination of the employment contract;
- Reporting to the competent authorities.

If you involve a third party (supplier, distributor, author, customer, or business partner):

- Application of contractually provided penalty;
- Termination;
- Reporting to the competent authorities.

The measures applied are always proportional to the actions committed under current legislation and internal policies. If necessary, the Compliance Department will

CODE OF CONDUCT



Provide for the communication of infringements to regulatory bodies and competent authorities and cooperate with any investigations and proceedings.

This document was produced with the support of several areas of the Company to contemplate the most considerable number of details and situations we may come across in our day and seek to clarify the main guidelines and behaviors expected of our employees, suppliers, and others involved.

We hope the information provided here will help you in your day-to-day activities, ensuring that our work is always guided ethically and transparently.