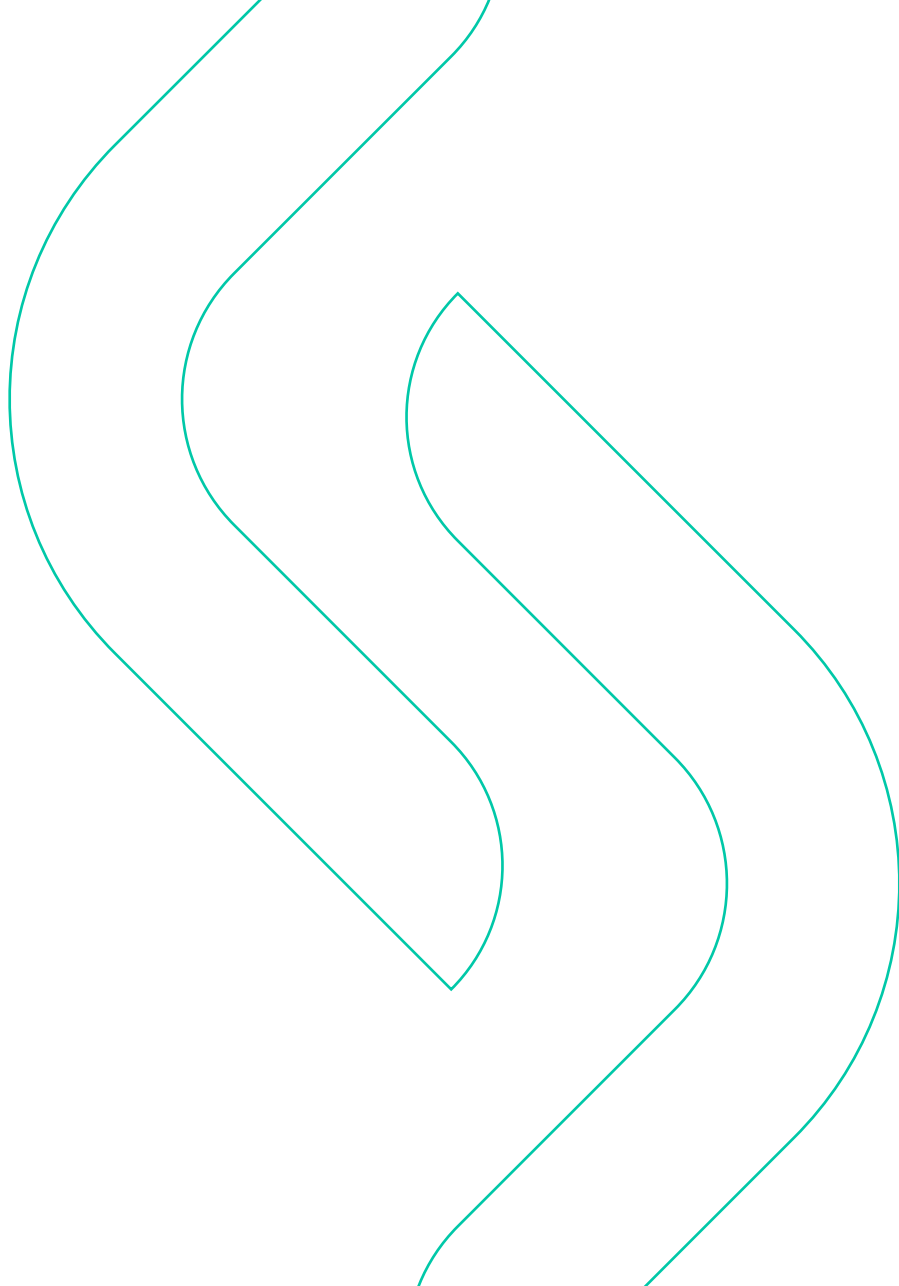




< CODE OF ETHICS AND CONDUCT >

updated version 2025



< **How Ethics drives our growth:** message from the president. >

Empowering people and driving business is more than our mission - it's the energy that moves Senior into the future.

For decades, we have built a solid and innovative trajectory, combining cutting-edge technology, intelligence and solutions that transform realities and the talent of the people who are part of our history.

We live in a time of international expansion that reflects the strength of human diversity, social responsibility and the non-negotiable commitment to integrity. **At Senior, we believe technology is made by people and for people.** Therefore, our culture is based on trust, collaboration and ethics in all relationships.

The Code of Ethics and Conduct is more than a set of rules — it is a collective pact that guides our decisions and reinforces our commitment to act with transparency, respect and responsibility.

Every attitude counts. This is how we protect our achievements and build together the path to an even greater future.

I count on each of you to live these values every day.

Carlênio - President Senior Sistemas



< About us >

Purpose

Empower People and
Boost Business.

We are a **Brazilian multinational, a reference in business management systems**, which drives companies with advanced technology, artificial intelligence, cloud systems and automation; transforming challenges into opportunities and data into results.



MISSION

Provide competitive and sustainable differentials for organizations, with committed and valued people.



VISION

Be the best choice in innovative solutions.



PRINCIPLES

CUSTOMER success moves us and with **SIMPLICITY** we ask the right questions to understand challenges and solve them objectively.

INNOVATION is in our DNA, to experience the new responsibly and without fear of making mistakes. We are protagonists and have **AUTONOMY**, prepared to make responsible decisions with a focus on results.

VALUES



CUSTOMER FOCUS

Relate to the customer in order to build solid and long-term bonds (loyalty) focusing on solutions that increase the competitiveness of your business.



ETHICS

Act with integrity, honesty, transparency, confidentiality and respect.



VALUING PEOPLE

Have people connected with the ideology, with high performance, innovative, collaborative and committed to Senior's sustainability.



INNOVATION

Explore ideas that generate competitive advantage to achieve results.

It is understood here that when we mention “SENIOR” we are referring to the headquarters, branches, business units, subsidiaries and/or acquired. It is up to the employee and everyone who relates to SENIOR to keep up to date with this document and the published policies and procedures.

< Who this Code is for >

This Code of Ethics and Conduct aims to establish guidelines and standards of conduct that should guide the behavior of SENIOR and its Employees, Shareholders, Officers and Directors, as well as Third Parties, in the execution of their day-to-day activities, as well as in interactions with public agents.

SENIOR adopts communication as an essential pillar of ethical relationships. Therefore, all audiences covered by this Code must always maintain respectful, clear and collaborative communication. This includes actively listening, expressing oneself with warmth, avoiding offensive, discriminatory, or aggressive language, and seeking to jointly build solutions. Regardless of the form of interaction, communication must be transparent, objective and guided by good faith and mutual respect, promoting a safe, welcoming and conflict-free environment.

Third Parties are understood as all individuals or legal entities that have a relationship with SENIOR, whether suppliers, customers, service partners, business partners or distribution channels.

This Code must be applied in an integrated manner with SENIOR's other internal policies and standards, being a fundamental document to guarantee our operations, achievements and reputation.



If in doubt about the interpretation and application of this Code, contact the Risk Management, Internal Controls and Compliance area at

compliance@senior.com.br

◁ Our Brand, Assets and Intellectual Property ▷

At SENIOR, the use of corporate assets, resources and assets must always be responsible, conscious and focused on the company's activities. Equipment, tools, systems and other resources exist to ensure our operational efficiency, business continuity and organizational integrity.

We especially value our intellectual property, as these assets are strategic assets and must be protected by all, as they support our competitiveness and impact on the market.

Intellectual property is understood as all brands, innovations, improvements, training, processes, procedures, products, projects, models, methodologies and financial, commercial or market information, ideas, know-how, sources, platforms or any other non-material activity developed in the company or by contracting it.

The use of the SENIOR Brand also requires attention and responsibility. It represents our reputation, stories and achievements, and must be applied with care, according to the official guidelines, available in the brand manual. In case of doubts about the proper use of the brand or any institutional asset, the Marketing area should be consulted.



◀ Leadership Protagonism ▶

At SENIOR, we recognize that leadership plays a central role in building and sustaining an ethical, upstanding, and responsible culture. We expect our leaders to be protagonists of a management model that unites coherence between discourse and practice, translating values into concrete attitudes on a daily basis.

More than leading teams, the leader inspires by example, influences behaviors and strengthens trust in relationships. Its protagonism is decisive to promote positive, safe, respectful and inclusive environments in every decision and in every conversation, in every choice, where ethics is not only a principle, but a constant practice. This is how trust is inspired, engagement is promoted and SENIOR's credibility is strengthened.



True leadership also expresses itself in the ability to foster collaboration between areas, breaking down silos and encouraging the construction of joint solutions. In a SENIOR where people and teams interconnect and support each other, innovation flourishes and results become more consistent. Therefore, we expect our leaders to actively encourage cooperation, value the diversity of perspectives and create bridges between different teams, making human interaction a strength of our business and a sustainable competitive advantage.

It is also the responsibility of the leadership to act in a preventive manner, taking care to avoid conflicts and protecting the reputation of the organization. This care is an inseparable part of those who understand that results are only sustained when there is trust and ethics as a basis.

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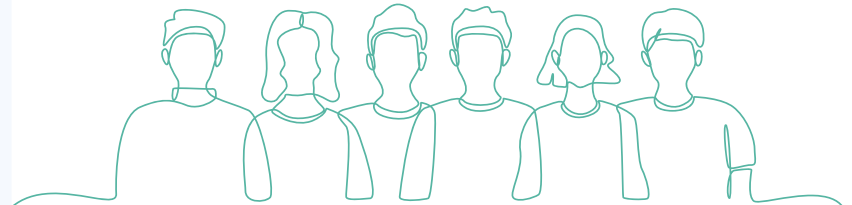


01

< HOW WE EMPOWER PEOPLE >

Chapter Summary

- \ Relationship with employees, suppliers, partners, competitors, and the community.
- \ Conflict of Interest.





We believe that each person is an agent of their own transformation. We empower people to take the lead in their own stories, with freedom to explore ideas, autonomy to make decisions and courage to innovate. We create an environment that fosters continuous learning, purposeful development, and building solutions that deliver real impact.

We encourage experimentation with responsibility, without fear of making mistakes, as we understand that learning is part of evolution. We are protagonists and have autonomy prepared to make conscious decisions, focusing on results and aligned with our values.

We value ethics as the foundation of every decision, building relationships of trust that generate a positive and lasting impact. We understand that simplicity is a transformative force, capable of opening creative paths and making possible what seemed complex.

We broaden horizons and build more human, innovative and sustainable futures, as every talent flourishes when they find purpose, freedom and space to grow with authenticity.



Ethical and safe work environment



SENIOR believes in the importance of individual freedom, so it treats people with dignity, providing professional and personal growth.

We believe that a positive work environment is the foundation for people and teams to reach their full potential. This environment is built with mutual respect, appreciation of differences and constant commitment to the dignity of each person.

We do not tolerate abusive behavior and/or practices, moral harassment, sexual harassment, inappropriate sexual conduct, bullying, abuse of power, physical or verbal aggression, threats or any form of discrimination, between Employees or third parties in our relationships. These behaviors erode the organizational climate, weaken trust, and compromise people's health and well-being. In addition to hurting fundamental ethical values, such attitudes reduce productivity, impair the quality of services and jeopardize SENIOR's reputation.

All important concepts in this topic should be consulted in DA.333 Glossary of Terms Applied to Compliance.

Promoting an ethical workplace means acting preventively, identifying signs of disrespect and acting so that conflicts do not turn into situations of violence or exclusion. It is everyone's responsibility and, in particular, the responsibility of leaders to ensure that the space is safe, inclusive and free from abusive practices.

A healthy environment is one in which people feel safe to express themselves freely, collaborate confidently, and develop their talents without fear, embarrassment, judgment, or discrimination. Welcoming, empathy and integrity are values that guide our daily relationships and ensure the sustainability of our growth.

We reinforce: respecting each other is not just a rule, it is the essence of our way of working. And only in this way can we build a strong culture, capable of generating lasting results and, above all, protecting what is most important to us: people.

The contribution of each person is very important to SENIOR's activities, so it is essential to maintain a work environment based on respect, empathy, collaboration, truth, solidarity and courage.



Relationships with Customer

The relationship with our customers must be built on trust, respect and long-term commitment. It is up to each employee to highlight, in all interactions, the values that define SENIOR: ethics, innovation, valuing people, quality, customer focus and maximizing results.

We conduct business with integrity, ensuring the confidentiality of the information entrusted to us and the reliability of the solutions we deliver.

Our goal is to establish solid links, supported by solutions that meet the most varied challenges of customers, boost their business and strengthen the partnership over time.

More than serving, we seek to exceed expectations, promoting experiences that generate real value. We work with a consultative vision, identifying opportunities for loyalty, relationship expansion and delivery of integrated solutions that contribute to the sustainable growth of our customers. Building relationships that are based on transparency, professionalism and the delivery of consistent results.

Relationships with Supplier

SENIOR establishes partnerships with suppliers based on criteria of ethics, integrity, legality and alignment with our values. We require compliance with labor, environmental, social, health and safety laws, the Anti-Corruption Law, the Brazilian General Data Protection Law (LGPD), information security rules, Intellectual Property rules, fair competition or any law applied to business and society.

The selection and monitoring of suppliers considers not only technical aspects, but also their reputation, legal acts and ethical conduct. For SENIOR, suppliers are an extension of our performance, and therefore, they must reflect the same standard of ethics, quality and responsibility.

No employee or shareholder must have a direct or indirect interest in a company that provides goods or services or conducts business with SENIOR, unless previously approved by a competent body



Professionals who have an employment relationship with SENIOR cannot be hired as suppliers, or provide any services other than those arising from the employment relationship.



Relationship with service partners , business partners or distribution channels

At SENIOR, we understand that our reputation and the strength of our brand depend not only on the conduct of employees or direct suppliers, but also on the behavior of all those who represent or act on our behalf.



We believe that our performance in the market must be built on solid foundations of trust and shared responsibility. Therefore, just as we do with our suppliers, we select and monitor our service partners (consultancies and their consultants), business partners or distribution channels based on criteria that consider not only technical aspects, but also their reputation, legal acts and ethical conduct.

Although they have different contractual natures, all these professionals and organizations are an integral part of our ecosystem and exert influence on customers, the market and society. We expect from them, then, the same standard of transparency, respect for people, legal compliance and alignment with the values that guide our internal practices. We require them to comply with labor, environmental, anti-corruption, LGPD, information security, piracy prevention, intellectual property and fair competition laws.

Thus, we expect all our service partners (consultancies and their consultants), business partners or distribution channels to observe the rules set forth in this Code of Ethics and Conduct, ensuring that their performance is in line with what SENIOR stands for. Behavioral alignment is indispensable for us to preserve our culture, consolidate market confidence and continue to build a history based on innovation.



Relationships with competitors

SENIOR conducts its market performance based on the principle of fair competition, provided for in the Federal Constitution and regulated by Law No. 12.529/2011, which structures the Brazilian Antitrust System.

This means that we respect the work of our competitors and compete ethically, seeking customer preference for the quality, innovation and reliability of our solutions.

It is expressly forbidden for any employee to adopt practices that damage the reputation or defame the image of competitors, as well as to make statements known to be misleading about their products or services. Likewise, it is forbidden to obtain market or strategic information from competitors by illicit means, configuring industrial espionage, violation of intellectual property or breach of confidentiality.

Conduct characterized as violations of the economic order, such as agreements for price fixing, market division, bid manipulation, abuse of dominant position or any practice that restricts free competition, is also unacceptable. Such conduct, in addition to harming SENIOR's values, is subject to administrative, civil and criminal sanctions under Brazilian law.

Thus, we reaffirm that competing in a fair and transparent manner is essential for our credibility, for the sustainability of the market in which we operate and for the preservation of the trust earned with customers, partners and society.

Relations with the Community

SENIOR knows that her role in society goes beyond business. Therefore, we value the relationship with the community and recognize the importance of contributing to the development of society. This commitment is reflected in initiatives that promote education, social inclusion, well-being and citizenship, always in line with our values and the ethical way of conducting business.



Relationship with public servants

SENIOR conducts its relationships with public agents based on ethics, transparency and respect for current legislation, especially the Anti-Corruption Law (Law no. 12.846/2013).

Our relations with public agents must take place only on an official and strictly institutional basis, based on ethics, transparency and integrity, in accordance with the legislation, avoiding any practice that may be interpreted as corruption, influence peddling or conflict of interest.

In compliance with an explicit rule of law, we are expressly prohibited from receiving, offering, promising or authorizing, directly or through Third Parties, any undue advantage of any nature, whether in money, goods or services of value to public agents, political parties, candidates for public office or any politically exposed persons, third parties, in Brazil or abroad, in order to obtain personal benefit or for SENIOR, whether to influence decisions, obtain favors, accelerate processes or guarantee commercial benefits.

Favoring is understood as any attempt to influence the act or decision of the public agent in his official capacity, such as, for example, the issuance of public licenses or authorizations, customs clearance, the signing or extension of contracts with public entities, the performance of inspections, decision making on the acquisition of advertising spaces, among others.

Under no circumstances, benefits or courtesies may be offered or granted to public agents and their relatives or to third parties acting on their behalf, with the purpose of influencing government decisions in favor of SENIOR's interests. For more information, see the internal policy PL014 – Anti-Corruption Policy and PL028 – Gifts, Gifts, Entertainment and Hospitality Policy. In cases of doubts in the interaction, situations involving bids, administrative contracts, inspections or institutional events, with public agents consult the area of Risk Management, Internal Controls and Compliance.



Conflicts of Interest

Conflict of interest occurs when the personal, financial or professional objectives or interests of a person or group may interfere, or appear to interfere, with decision-making in the performance of their duties at SENIOR.

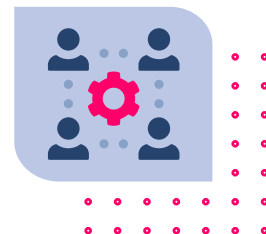
Situations that represent potential conflicts of interest must be reported to the Compliance area, as provided for in the Conflict of Interest Prevention Policy (PL XX), through a specific form. Examples include:

- A** Misuse of confidential, strategic or privileged information;
- B** Sharing of internal information without prior authorization (Investor Relations, Legal, Compliance and Information Security);
- C** Disclosure of data that compromises the integrity, security or reputation of the company;
- D** Obtaining personal benefits through the position held in the company;
- E** Relationships of kinship or affective with third parties or colleagues under subordination;

- F** Participation in decisions involving people with personal ties - kinship;
- G** Employees/shareholders/officers/directors who are or have been Public Agents or Politically Exposed Person (PEP), as well as kinship or affective relationship with Public Agents or PEPs;
- H** External activities that conflict with the core of the company and/or the employee;
- I** Use of company resources for private purposes;
- J** Equity participation in third parties;
- K** Be a partner of companies that maintain a commercial relationship and/or partnerships with Senior (suppliers, customers, partners or distribution channels).

SENIOR expects everyone to act with exemption, professionalism and full alignment with SENIOR's values. Any situation in which personal interests — own or third parties — may influence decisions or compromise the integrity of the business must be immediately communicated to the Risk Management, Internal Controls and Compliance area.

It is forbidden to use SENIOR's position, function or prestige to obtain undue advantages, patrimonial or otherwise.





02

◀ HOW WE DRIVE OUR BUSINESS ▶

Chapter Summary

- \ Data Privacy and Inside Information.
- \ Accountability, Transparency, and Corruption.
- \ Use of Artificial Intelligence.





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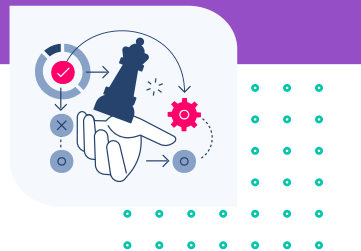
Compliance with legislation

People who carry out activities in the name or on behalf of SENIOR must, at all times, comply with laws and regulations, in particular the rules on combating corruption, data privacy, legal competition, information security, prevention of: fraud, piracy, money laundering and slave-like work.

Special care should be employed in sectors where the law is evolving or being extended to situations not previously covered.

Everyone must also respect and follow the export and economic sanctions policies, as well as all laws in force in the country in which they are operating. This includes laws and regulations relating to trade embargoes and economic sanctions, export control, anti-boycott laws, cargo security, import classification and evaluation, product/country of origin marking, and free trade agreements.

All professionals must always be up to date with the legislation that, directly or indirectly, binds them to SENIOR, either by activity, training or place, without prejudice to those that concern the community.





Prevention of acts of Corruption, Fraud and Money Laundering

Corruption is harmful to the economy, undermines business development, and creates an environment conducive to inappropriate practices that undermine societal trust. Ethical companies are more valued in the market, attract investments and build sustainable relationships. Therefore, SENIOR adopts a firm position to combat any form of corruption and expects all its employees, partners and service providers to act with the same responsibility and integrity.

SENIOR does not tolerate the practice of acts of corruption under any circumstances. Any situation that can be characterized as such will be analyzed by the **Risks and Compliance Committee, subjecting those involved to the applicable internal sanctions, without prejudice to the penalties provided for by law.**



Under no circumstances is it allowed to pay, offer, request or receive bribes, bribes or any undue advantage, whether in Brazil or abroad, even if it is claimed to be necessary to carry out the activities. Such practices endanger not only SENIOR, but also the personal integrity of those who adopt them.

We reinforce that integrity must guide all relationships — with customers, suppliers, partners, competitors and public or private agents. Only in this way do we preserve the credibility built and consolidate SENIOR as an ethical, solid and reliable company in the market in which we operate.

In addition, the manipulation of information, misuse of resources or concealment of the origin of values are illegal practices that compromise the integrity of the company and can have serious legal and reputational consequences. It is an obligation for everyone to be aware of signs of irregularities, such as unusual transactions, inconsistent documents or suspicious behavior.



How does Corruption happen?

(For more information, see PL041-
Anti-Corruption Policy.)

**All important concepts in this topic should be consulted in DA.333
Glossary of Terms Applied to Compliance.**



Privacy and Personal Data Protection

Protecting personal data is not only a legal obligation, it is an ethical and strategic commitment of SENIOR. The way we treat data directly reflects our responsibility to employees, customers and partners, in addition to impacting trust in the market.

SENIOR adopts technical and organizational measures to protect the personal data of employees, service providers, suppliers, customers and partners, in accordance with the applicable legislation, in particular the Brazilian General Personal Data Protection Law (Law No. 13.709/2018 – LGPD) and the guidelines of the ANPD (National Data Protection Agency), as provided for in PL003 – Data Protection Policy.

SENIOR appointed a Data Officer (DPO), who acts as a communication channel between the company, the holders and ANPD, in addition to guiding and supervising privacy compliance. Questions about data processing, exercise of rights (access, correction, deletion, opposition, portability, among others) and requests from data subjects should be directed to the DPO or the Legal Department through SENIOR's official channels:



encarregado@senior.com.br

Confidentiality of Business Information (Information Security)

At SENIOR, the protection of corporate information is essential to ensure business continuity, market trust and everyone's security. Confidential, strategic, commercial, financial, technological or any other information that has not been publicly disclosed must be treated with absolute confidentiality by all.

It is the duty of all of us to protect information about SENIOR's business, activities, projects, results, personal data and any intangible assets, avoiding unauthorized sharing with third parties, competitors or the press. Inadvertent or unauthorized disclosure of relevant, confidential, material or privileged information communicated to any person or body prior to its disclosure to the market by any person must be immediately reported to the person responsible for Investor Relations and the competent area, so that the appropriate measures can be taken.



SENIOR adopts clear information security rules that must be followed by all, as provided for in PL040 – Information Security Policy.



Inside Information and Insider Information

Inside information is that which, if made public, may materially influence the decision of investors or impact the quotation and trading volume of securities issued by SENIOR or its subsidiaries.

Brazilian law expressly prohibits employees, directors, shareholders, managers or anyone with access to such information from using it for their own benefit or for the benefit of third parties. Accordingly, it is not permitted to trade, directly or indirectly, SENIOR's shares, debentures, subscription rights or any securities based on inside information, nor to pass on such information to third parties prior to its official disclosure.

Violation of these rules may result in administrative, civil and criminal sanctions, as provided for in applicable law.

Everyone must observe the legal and regulatory provisions on the subject, as well as the Company's Material Act or Fact Disclosure Policy and the Company's Securities Trading Policy, or any instruction or guidance from the Company to that effect, disclosed on SENIOR's website.

Piracy Precautions

SENIOR repudiates any form of piracy

It is strictly forbidden to acquire, use or market products, parts, software, services or content that are counterfeit, adulterated or of illicit origin.

Piracy compromises the quality, safety and reliability of our processes, in addition to generating legal and financial risks to the Company. All Employees must ensure that only legitimate goods, solutions and technologies are used in their activities, ensuring the protection of intellectual property, market integrity and SENIOR's reputation.



Financial accountability and transparency

SENIOR has in its principles: accurately record, maintain and report business documentation, including, but not limited to, financial accounting, quality reports, time records, expense reports and submissions to customers or regulatory authorities, where appropriate.

We adopt the best accounting practices applicable to large companies and S.A. (Corporation) companies, in accordance with the law 6.404/1976 and the pronouncements of the CPC – Accounting Pronouncement Committee.

All accounting, financial, business and operational records of SENIOR must accurately reflect the operations carried out. Responsibility for the integrity of this information is shared by all areas and people who produce or provide data, not limited to accounting and finance teams

Transactions must be recorded completely, accurately, in the correct accounting period and always supported by adequate documentation. It is expressly forbidden to falsify, omit or manipulate records in order to achieve goals, change results or circumvent legal and tax obligations. Transparency and veracity of information are pillars of our ethical and responsible actions.



To ensure traceability, our payments can only be made to those who have actually provided goods or services, in a legitimate manner, in the country in which the supplier maintains its operations. Practices such as tax evasion, fraud or disregard for tax and monetary rules are not tolerated.



Use of social networks and party political demonstrations

SENIOR expects that the presence of its employees on social networks and in the workplace is guided by respect, civility and compliance with current legislation. The use of information, images, brands or any other content related to SENIOR is subject to the rules of this Code and the guidelines defined by the Marketing and Internal Communication areas. The creation of profiles or pages on behalf of SENIOR may only occur with express authorization and in accordance with such guidelines.

At SENIOR, we value freedom of expression and mutual respect. It is natural for employees to share their personal opinions on their profiles, as long as this is done with responsibility and respect.

It is important to remember that, when speaking publicly, the employee must avoid any undue association with SENIOR's image. The mention of co-workers should also occur in an ethical and cordial manner, preserving dignity, privacy and a good relationship between everyone.

We respect the diversity of thoughts, beliefs and opinions. As a non-partisan and secular company, we maintain a neutral stance towards political-partisan, religious or ideological manifestations. Therefore, it is not allowed to use SENIOR's name, brand, premises or channels for this type of manifestation. It is also important to avoid associating personal profiles—even indirectly — with positions that can be interpreted as representing SENIOR.

We believe that the debate is healthy insofar as it promotes democracy constituted by respect for the diversity of ideas. But the company also recognizes that the party option is individual and, therefore, maintains a neutral position and encourages the same impartiality among employees in the workplace.

Our commitment is to maintain a plural, ethical and welcoming professional environment, guided by respect and institutional neutrality. We value the diversity of individual opinions, ensuring that they are recognized, without ever being confused with SENIOR's official position.



Use of Artificial Intelligence

The use of Artificial Intelligence (AI) tools at SENIOR must occur broadly, constantly and responsibly, and always in prior alignment with the areas of Information Security and Information Technology.

It is everyone's obligation to ensure that the environments used are safe, ensuring the confidentiality of data, the confidentiality of corporate information and the preservation of SENIOR's reputation.

The inappropriate use of AI may expose the company to legal, operational, safety and image risks, and any application that does not comply with technical, ethical criteria and current internal guidelines is prohibited.

The results, texts, analyzes or recommendations generated with the support of AI tools must be reviewed and validated by a human professional, and AI cannot be considered a final, official or autonomous source of information.

It is forbidden to enter, share or process sensitive, personal, strategic or customer data on AI platforms that are not expressly authorized by the competent areas.



For detailed guidance on the subject, refer to PL101 – SENIOR's Artificial Intelligence Policy.



03

< DONATIONS AND SPONSORSHIP >

Chapter Summary

\ How to carry out donation and sponsorship actions.





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SENIOR recognizes its active role in society and the business ecosystem. Therefore, it can make and also receive donations or sponsorships that are aligned with its values, purpose and commitment to sustainable development.

These initiatives can focus on both social responsibility and community support, as well as strategic partnerships that drive innovation, culture, and education. All actions must respect ethical criteria, alignment with SENIOR's values, risk assessments, follow the regular flow of internal approvals and not aim to influence decisions of public agents.

Transparency and integrity are key to ensuring that these practices strengthen our reputation and generate positive impact inside and outside the organization.

It is not allowed to make sponsorships and/or donations of a political nature, to candidates or political parties or associations linked to them, on behalf of SENIOR.





04

< GIFTS, PRESENTS, ENTERTAINMENT, AND HOSPITALITY >

Chapter Summary

\ How to handle the receipt and delivery of gifts and presents.





The offering and receiving of gifts, presents, travel, events, congresses, courses and other hospitality may characterize undue favoritism, bribery, facilitation payment or corruption between the parties to a business. For this reason, only those who observe the conditions set forth in PL028-Gifts, Presents, Entertainment and Hospitality Policy will be considered regular.

The gifts and presents granted by SENIOR or received by Employees, Directors, Managers or Representatives must be institutional, preferably with the company logo, without commercial value or with symbolic value, and may never have the purpose, real or presumed, of influencing decisions, obtaining undue advantages or compromising the integrity and impartiality of relations.

The maximum limit for offering and receiving gifts is equivalent to the maximum amount of 40% of the current minimum wage.

The offering and receipt of hospitality and entertainment must occur in a transparent, moderate manner and in line with SENIOR's interests, without any expectation of consideration, favoritism or influence on business decisions.

All items received, even if addressed nominally to employees, are considered property of the company, and receipt on behalf of third parties, family or friends is not allowed. Delivery of any items shall take place exclusively at SENIOR's official addresses.



In case of doubt as to the adequacy, value or circumstance of receipt, those involved should seek guidance from the Risk Management, Internal Controls and Compliance area.



compliance@senior.com.br



05

< HEALTH, SAFETY AND WELL-BEING >

Chapter Summary

- \ Health and well-being.
- \ Work environment.





We ensure an environment in which each employee can perform their duties in a healthy and safe manner, without exposure to factors that compromise their integrity. In this sense, the consumption, possession or acting under the influence of alcohol and drugs in all activities related to SENIOR is prohibited, since such practices directly affect concentration, discernment and collective security.

Caring for health is also an individual and shared responsibility. Therefore, we encourage conscious attitudes, the appropriate use of available resources and the search for support whenever necessary, building together a work environment that respects limits, promotes balance and ensures conditions for each person to exercise their potential in a full and sustainable way.

Well-being goes beyond the absence of physical or health risks, it involves creating an environment where everyone feels respected, valued and motivated. This includes fostering relationships of trust, empathy, active listening, cooperation and work-life balance, and valuing diversity and inclusion

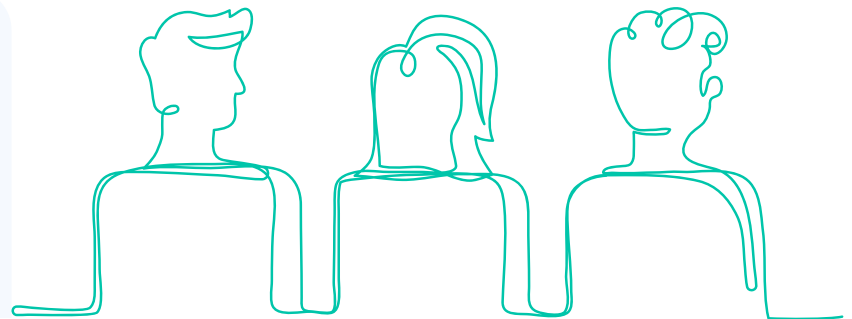
All employees are expected to contribute to a welcoming organizational culture, free from discrimination, harassment, violence or any form of disrespect, strengthening engagement, reducing stress and inspiring pride in belonging.

06

< SUSTAINABILITY AND HUMAN RIGHTS >

Chapter Summary

\ How we manage diversity and environmental impacts.





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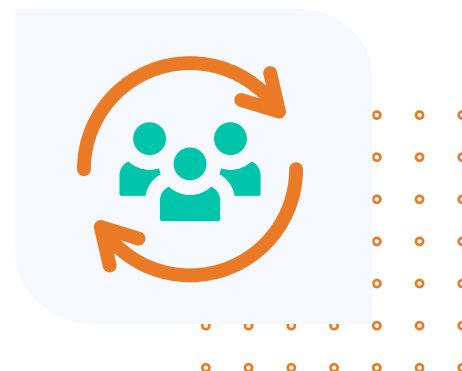
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SENIOR invests to integrate sustainability, governance and social responsibility issues into its operations.

We value diversity and understand that an inclusive environment contributes to good relationships and new ideas.

We seek to reduce environmental impacts, complying with current legislation, respecting human and labor rights and maintaining compliance practices aligned with our maturity stage.

Our focus is on adopting simple, clear and responsible practices that help strengthen the trust of everyone with whom we relate. To this end, we prioritize evolution, consistently and coherently, always learning and improving over time, so that our actions are not just projects, but are naturally integrated into the company's daily life.





07

< REPORTING CHANNEL AND DISCIPLINARY >

Chapter Summary

Channel Principles:

- \ Impartiality
- \ Secrecy
- \ Independence
- \ Anonymity
- \ Confidentiality
- \ Non-retaliation





At SENIOR, acting with integrity is an expected, valued and indispensable behavior. Everyone has the duty to ensure compliance with this Code of Ethics and Conduct, internal policies and current legislation.

Any situation that is or seems illegal, unethical or inappropriate, such as corruption, fraud, harassment, discrimination, conflict of interest, among others, must be reported through the Reporting Channel. The report can be anonymous or identified, at the discretion of the whistleblower; and can be made by anyone, even if they are not the victim or have not personally witnessed the facts.

SENIOR's Reporting Channels



E-chat



+ 55 11 4780-6110



denuncia.senior@resguarda.com



0 800 891 463



Service hours: 8 AM to 10 PM - Op. 1: Operator | Op. 2: Recorded Message

Complaints will be treated with secrecy, security, seriousness, impartiality and confidentiality by the Risk Management, Internal Controls and Compliance area.

Reporting unethical conduct or non-compliance with norms and laws is fundamental to SENIOR's success, in addition to being expected and valued behavior.

Reprisal or retaliation will not be tolerated against the person who has made a report in good faith and with reasonable conviction that a violation of this Code has occurred, is occurring, or will occur.

Failure to comply with this Code implies, as the case may be and at SENIOR's sole discretion, disciplinary actions, contractual termination, and/or applicable sanctions, such as: (i) verbal warning; (ii) written warning; (iii) suspension with or without loss of remuneration; (iv) dismissal with or without cause, or (vi) filing of lawsuits.

The application of sanctions due to transgressions of the rules of the Code of Ethics and Conduct will be assessed on a case-by-case basis and must consider: (i) the nature and severity of the transgression; (ii) the position of the transgressor and its responsibilities; (iii) the transgressor's history and mitigating circumstances; (iv) the means used and the intended purposes; (v) the risks involved; and (vi) the possible consequences of the sanction.

SENIOR has a detailed internal policy on the Reporting Channel that can be consulted (PL106).



08

< QUESTIONS AND REVISION CONTROL >

Chapter Summary

- \ Canal de Compliance.
- \ Version Control.





01
HOW WE EMPOWER
PEOPLE

02
HOW WE DRIVE OUR
BUSINESS

03
DONATIONS AND
SPONSORSHIP

04
GIFTS, PRESENTS, ENTERTAINMENT,
AND HOSPITALITY

05
HEALTH, SAFETY AND
WELL-BEING

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SUSTAINABILITY AND
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REPORTING CHANNEL AND
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QUESTIONS AND
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When in doubt, don't make decisions on your own. Look for the Risk Management, Internal Controls and Compliance team by email:



compliance@senior.com.br

Revision Control

(Any amendments to this Code are approved by the Board of Directors and duly disclosed to all)

REVISION	REASON	DATE
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