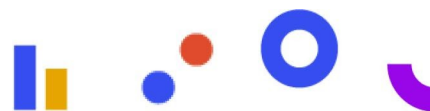


**olist**

**code of ethics  
and conduct.**

version 1.0

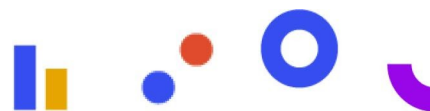


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# 1. message from the ceo

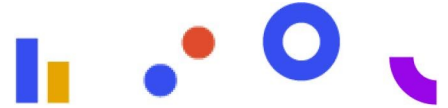
Win the right way! This value is the basis of the **Code of Ethics and Conduct of Olist Serviços Digitais Ltda.**, its subsidiaries and branches (“olist”) and which translates the guiding principles of our routine in favor of our credibility and reputation.

This code represents the behavior and commitment made by all of us, olisters, in the conduction of our daily life following a responsible, ethical, integrity, transparent and mutually respectful conduct.

Therefore, it is everyone duty to learn, understand, practice and make effective all ethical principles that integrate this code in the relationships between olisters, customers, partners, suppliers and the society in general.

The compliance with this code is fundamental to the strengthening of our culture and is a reference for the practice of our values.

**Tiago Dalvi**  
CEO&founder



## 2. mission, vision and values.

### 2.1 Mission

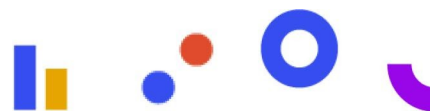
- Empowering commerce.

### 2.2 Vision

- Be the greatest merchant in the world.

### 2.3 Values

- **We are real people.** We celebrate victories and achievements. We respect others and value differences. We are mature and welcoming. We live in harmony and feel good in the workplace.
- **We are all owners.** Olist is ours and we wear the shirt with a purpose. We find no justification, but solutions. We do not confuse freedom with lack of responsibility. We care for the common space and equipment.
- **We are one team.** The other one problem is also my problem. We focus more, disperse less. Here there is no whining and we value continuous and constructive feedback. We accept what is best for the company and not only for each individual, and so we always look at the whole.
- **We make it happen.** We focus on results and challenge the *status quo* on a daily basis. We seek excellence in everything we do, always. A good idea is a shared idea and put into practice. We start small, learn fast and accelerate!



- **Win the right way.** We make decisions based on ethics and common sense. We respect current legislation and celebrate our achievements with clear conscience. At a crossroads, we always choose the right thing.
- **We are dedicated to the success of our customers.** We are committed to the success of our customers, whether a shopkeeper, consumer, brand or olist. We keep an eye on their needs and wonder if our decisions resolve their pains, and if we are doing the best we can for the success of each of them.

### 3. objective.

This code aims to establish the fundamental guidelines of Olist relationship with its employees, third parties, customers, partners, community, authorities or any other person that Olist relates with and reflects Olist commitment when developing its activities in compliance with ethics and respect for applicable legislation.

### 4. scope.

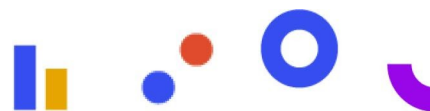
This code is applicable to **Olist Serviços Digitais Ltda.**, to all its branches, subsidiaries and controlled, located in Brazil or abroad (“olist”), including all its employees, regardless of the position or function held (collectively called “olisters”).

**Olisters** shall transmit the principles and standards of conduct herein contained to all third parties that olist hires, including all service providers, suppliers of goods, materials, services or products, attorneys, translators, correspondents, customs brokers, brokers (“suppliers”) or to any other person or entity which Olist relates with.

Suppliers, Partners or other natural persons or legal entities, customers, entities or authorities which olist relates with shall observe, as applicable, the provisions of this Code of Ethics and Conduct, in compliance with ethics applicable legislation (“third parties”).

### 5. definitions.

- **Public agent** means any agent, authority, officer, servant, employee or representative, or



any person exercising, even temporarily and with no remuneration, a position, function or employment in any entity of direct or indirect public administration, national or foreign.

- **Public administration** means any entity of direct or indirect public administration, national or foreign.
- **Courtesy** means any giveaway, gifts, entertainment (e.g. events and lectures) or hospitality (e.g. meals and travel).
- **Compliance Due Diligence** means the diligence process performed by Olist, as provided for in the Compliance Due Diligence Policy, to obtain and analyze appropriate information for hiring and, as applicable, for the supervision of third parties from the point of view of integrity, international sanctions and prevention of money laundering and terrorist financing.

## 6. standards of conduct.

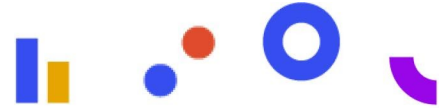
### 6.1 Commitment to legislation

Olist expects that all its **olisters and third parties** develop their activities in strict compliance with the principles and guidelines provided for in this code and applicable legislation, in particular, but not limited to, those that prohibit corrupt practices, such as **Law No. 12.846/2013 (Anti-Corruption Law)**, **Law No. 8.429/1992 (Administrative Improbity Law)**, **Law No. 9.613/1998 (Money Laundering Law)**, **Law No. 12.529/2011 (Competition Defense Law)**, and their future amendments.

### 6.2 Work environment

The work environment, diversity and care for the environment are extremely relevant to Olist. Therefore, we value and count on the help of the Olisters (and of any people who attend here) for the construction and maintenance of a pleasant work environment that values and respects diversity, provides flexibility and autonomy to people, and fosters the culture of high productivity.

In this sense, Olist is contrary and undertakes to take appropriate measures in the circumstance of any:



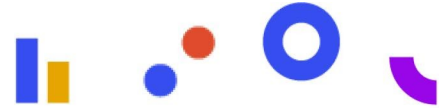
- Discriminatory attitude due to race, origin, gender identity, age, religious belief, political conviction, sexual orientation, physical or psychic condition;
- Hiring of child labor and work of children under 14 years;
- Use of Olist position or insider information for privileges or any other form of favoritism for yourself or third parties;
- Practice of any type of harassment, such as verbal, physical, psychological, visual, virtual, moral or sexual;
- Use of offensive or prejudiced words;
- Physical or psychological violence, shouting, intimidation or threats of any kind;
- Inappropriate solicitations or offers of personal favors or benefits or in conflict of interest, even for others, internally or regarding third parties;
- Possession or custody of weapons of any kind at Olist premises or in any Olist-related activity, except properly authorized service providers who require weapons as a working tool;
- Enter, remain, carry or consume illicit drugs and/or alcohol in the workplace or in any activity related to Olist (reasonable and moderate consumption of alcoholic beverages is permitted at corporate events that are properly authorized by the Responsible Manager).

Everyone should relate within the highest standard of human and professional respect, regardless of the position they occupy, the role they perform and the time working at the company.

Any violations by our Suppliers and customers of such standards of conduct that come to the attention of olist will be dealt with the seriousness and severity they require, and olist may exercise its rights and terminate relationships, respecting the contractual commitments made.

### **6.2.1 Information Security and Insider Information Guidelines**

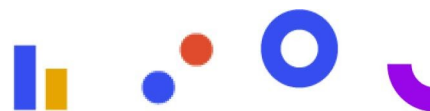
All olisters, suppliers and customers must consider the information obtained in the context of their relationship with Olist for their work as an asset of olist, a necessary resource for the realization of the business, with a great value for olist, which should always be kept confidential and protected.



Information about customers, service providers, financial results, technology, business strategy is absolutely restricted, and can be accessed only by olisters, so that the disclosure or unauthorized use of such information may cause damage to the business, endangering olist business strategies.

Therefore, olisters, suppliers and customers must comply with the following **Information Security Guidelines**:

- Maintain the confidentiality of the information belonging to olist and third parties, which include, drawings, projects, concepts, schemes, ideas, inventions, technical specifications, discoveries, templates, data, source programs or software object codes, part of source programs or software object codes, technical documentation, manuals, diagrams, flowcharts, research, developments, processes, procedures, know-how, new information technologies, marketing techniques, marketing plan, tables, strategies, customer names, and other information related to olist and customers, such as: contracts related to the provision of services, price policy and financial information other than in the public domain, whether they are of recognized or potentially recognizable intellectual property of olist, and also owned by third parties which olist has entered into any type of contract. The information mentioned above may only be shared publicly or to third parties with the express authorization of olist, respecting the relevant policy of competence as in the case of lectures, training, presentations and release of source codes under an Open Source license;
- The disclosure of confidential information of Olist, especially in the way that these are defined in the **Information Security Policy**, shall be considered a serious misconduct, and, depending on the circumstances, a crime of unfair competition, **with violation of Art. 5, item XXVII, of the Federal Constitution, of Arts. 196, item XII and 184 of the Criminal Code, and Law 9.279, of 05/14/96**;
- You shall not use the above defined information, at any time, in the present and future, to prepare or develop computer programs that are similar or that compete in the market, or are owned by the companies which olist provides services to, or, not to allow or facilitate that third parties are able, through received information, to develop such programs, including, but not limited to, systems architecture, data files, inventions and derivations, source and/or object codes, software parts, logical and functional software projects and others;
- Access to the Internet, through olist assets, should comply with the purpose of your professional activities, observing the conscious and responsible use and subject to audit by olist;



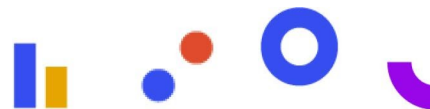
- Information related to personal data of customers, service providers or partners is exclusively accessible to professionals that, because of the need for compliance with an employment contract, so require. They cannot be accessed or shared by others, whether through file, system or any other means (including email, instant messaging applications, physically etc.).
- Olist works with the telephony system via PABX that allows the recording of the calls made by olisters and third parties, and the use of the telephony system must be exclusively for labor purposes. Recordings made are used for training purposes and technical guidance to olisters.

The use of technological tools for different purposes and in non-compliance with the **guidelines of olist, Information Security Code**, good faith and good manners, are expressly prohibited.

### 6.2.2 Information security management

The responsibility of the Information Security Management is to:

- Identify, compose and propose policies, standards, processes, technologies, adequacy plans and staff focused on maintaining security and compliance in the cloud, on-premise and remote workforce;
- Propose specific methodologies and processes for all information security and cybersecurity processes, such as risk assessment, information classification systems and information security incident response standard;
- Propose and support initiatives aimed at the security of olist information assets;
- Seek alignment with the institution corporate guidelines;
- Promote the awareness of Olisters regarding the relevance of information security to **olist** business, through campaigns, lectures, training and other means;
- Support the evaluation and adequacy of specific information security controls for new systems or services;
- Analyze the risks related to the security of information of olist and submit periodic reports on such risks, followed by a proposal to improve the environment;



- Critically analyze information security and cybersecurity incidents in conjunction with the **Cybersecurity and Information Committee**, managing these incidents;
- Support the Cybersecurity and Information Committee in its deliberations;
- Present the minutes and summaries of the **Information Security Committee** meetings, highlighting the topics that require an intervention of the committee itself or other members of the board;
- Maintain effective communication with the **Information Security Committee** on issues related to the topic that affect or have the potential to affect olist business strategy;
- Analyze cases of violation of this Policy and **Information Security Standards**, referring them to the Executive Board, when applicable;
- Conduct the Management and Operation of information security and cybersecurity, based on this Policy and other resolutions of the Information Security Committee;
- Identify and evaluate key threats to information security, infrastructure, cloud workload, application code and cyber risks, and also propose and implement control and corrective measures to reduce the organization risks in all aspects;

### 6.3 Relationship with society and environment

The relationship of olist with the communities where it operates is based on respect, transparency and sustainable development. The olist supports the preservation of the environment and reinforces with olisters and third parties the culture of respect for natural heritage.

In addition, olist encourages the participation of its olisters in social activities and actions that have the purpose of improving the quality of life and social well-being of the communities around it.

### 6.4 Customer relationship

Olist relationship with its customers is based on excellence. Therefore, all Olisters must:

- Act with respect, cordiality, transparency, dignity and equality;



- Act in an efficient, coordinated and integrate manner;
- Make safe and quality products and services available;
- Provide clear and accurate information, in addition to making the best efforts to analyze and respond to requests and/or complaints within a reasonable time and compatible with expectations and needs; and
- In the event that an Olist is a partner of a company, this may contract Olist services to market its products through Olist Platform. The Olist company must meet all the prerequisites normally required by Olist, and the Olist cannot take advantage his/her position at Olist to achieve any kind of benefit regarding the services provided by Olist.

## 6.5 Relationship with suppliers

Olist requires from its Suppliers and other partners the same degree of commitment to the ethics and legislation that is practiced at Olist.

In this regard, Olist adopts Compliance Due Diligence procedures prior to contracting any Supplier and with customers in order to comply with legal obligations, obtain appropriate information and manage potential risks associated with such relationships.

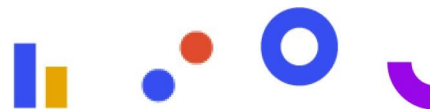
In addition, all contracts with Suppliers must include anti-corruption clause and all suppliers must receive a copy of this code.

## 6.6 Relationship with competitors

Olist treats its competition with respect and undertakes to never perform any act in violation of free competition or which encourages, in any way, the formation of cartels or the manipulation of the market, observing the provisions of **Law No. 12.529/2011 (Law of Defense of Competition)**, and its future amendments.

Therefore, it is strictly forbidden to:

- Make any agreement or exchange of commercially sensitive information that may harm free competition, both to harm any competitor, and to favor Olist and/or any competitor;
- Expressly or tacitly agree that prices, price limits, discounts or forms of pricing or other similar themes are fixed, dividing customers, third parties or territories;



- Agree the non-provision of any service to a customer or stop hiring a certain type of third party; and
- Olisters are not allowed to provide any professional consulting or other services, with or without remuneration, or also to participate in the management or operation of any company that may become a competitor or Supplier of Olist.

If any Olist is at any association meeting, working group or other organization where someone starts a conversation on the above topics, he/she should interrupt the conversation or immediately leave the meeting, making his/her leave appear in minutes, if any, and report internally what happened, and the Ethics and Conduct Channel may be used for this purpose.

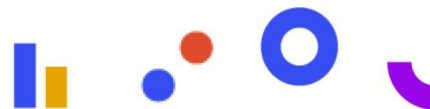
## 6.7 Relationship with Public Agents

Olist does not tolerate any form of corruption, which for Olist means to offer, promise or give, directly or indirectly, anything of value to a Public Agent or to any person in the private sector for the purpose of influencing the decision-making of that person in the exercise of a function or position or to obtain an improper advantage for Olist or any person.

The payment or offer of bribes in the public and private sector, and also payments with the purpose of facilitating routine government activities that are considered improper advantages by Olist and for many Government Authorities of countries where Olist operates and, therefore, are strictly prohibited. Not only money is considered an improper advantage, but also anything of value, such as gifts, entertainment, meals, travel and other amenities.

Therefore, no Olist can:

- Promise, offer or give, directly or indirectly, improper advantage to the Public Agent, or the third person related to him, nor to anyone in the private sector;
- Finance, fund, sponsor or in any way grant financial aid for the practice of illicit acts;
- Use of a natural or legal person to hide or conceal their real interests or the identity of the beneficiaries of illegal acts;
- Frustrate or defraud bids and administrative contracts; or



- Hinder the investigation or supervision activity of the Public Administration or Public Agents, or intervene in their performance, including in the scope of supervisory bodies of the national financial system.

In addition, in the context of any interaction, meeting, contact or meeting with Public Agents, held in the name, interest or benefit of Olist, should:

- Use a clear, precise and technical language, avoiding terms or expressions that may generate misinterpretations on the discussed topics;
- Be held in a building, office or public facility and during business hours;
- Always count on the presence of at least two Olisters;
- Refuse any request for improper advantage by Public Agents.

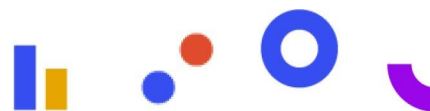
In addition, if Olisters meet with Public Servants at public or private events (e.g., seminars, associations, conferences, birthdays, parties, dinners, among others), they should refrain from addressing specific matters and interests of Olist. If the Public Agent takes the initiative to address the subject, it is suggested to hold a meeting, in a professional environment and during business hours.

Olisters shall communicate our standards of conduct to Suppliers and customers, and Olist expects to conduct its business with the same level of respect for applicable laws, fully complying with applicable compliance clauses and provisions under the agreements and guidelines communicated by Olist.

If any Olist, customer or Supplier understands that any situation above has occurred, is occurring or may occur, it shall report internally the event, and may use the Ethics and Conduct Channel for this purpose.

## **6.8 Declarations before the general public, use of social media and disclosures in general**

As you know, all information you obtain while Olist or in olist Third Party position is confidential, and therefore, cannot be disclosed without the prior and express authorization according to Olist rules of competence.



In addition, Olist is increasingly gaining prominence in the local and international press, and also on social media. However, these disclosures and declarations are controlled and must always meet Olist business strategy and guidelines.

Our face-to-face and virtual work environment should also be considered confidential, and also we must respect the individual image rights of the Olisters and Third Parties. In this regard, any photograph or recording of any nature always depends on the consent of all involved.

In this sense, if any press professional contacts you, never provide Olist information and refer the contact to **branding@olist.com** and **juridico@olist.com**.

If you are invited to write articles, participate in lectures, public demonstrations, lives on social networks or to speak publicly in any sphere in order to link your image with Olist, please contact **branding@olist.com** and **juridico@olist.com** to have guidance on this positioning.

## 6.9 Prevention of money laundering and terrorist financing

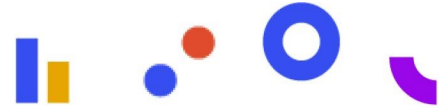
Olist does not tolerate, under any pretext, that business is conducted with any natural person or legal entity which activities are unlawful and/or which resources come from illegal sources.

For that, Olist has adopted a Policy for the Prevention of Money Laundering and Terrorist Financing, which must be complied with by all Olisters.

When working at Olist, Olisters authorize their companies to request, obtain and maintain qualification data and checks on Politically Exposed Person (“PEP”) for the purposes of complying with the Policy for the Prevention of Money Laundering and Terrorist Financing, and also agree to promptly inform Olist if he/she is or will become PEP under that policy.

## 6.10 Prevention of conflict of interest

Conflict of interest occurs whenever personal or third-party concerns or goals may influence the Olisters ability to act with exemption, either because they or someone close to them have something to gain or lose with choices made in a particular context. Close persons include spouses or partners, parents, children, and other dependents of the Olist or their spouse or partner, friends, or other people in their relationship.



All Olisters who present, suspect or witness conflicts of interest must report such a situation to the Human Resources Department and/or through the Ethics and Conduct Channel. Examples of situations that may be characterized as a conflict of interest include:

- Business with a company where a close person holds an executive position;
- Family relationship with Public Agents with decision-making power in the business of Olist;
- Simultaneous work for competitors, customers or other third parties;
- Ownership of a significant percentage of competitors or Suppliers equity;
- Personal business with Suppliers.

Olisters must conduct their activities in such a way that defends Olist interests and even avoid the appearance of any conflicts of interest. All kinds of situations that give the impression that the Olist cannot perform his/her duties objectively should be avoided due to the existence of conflicting interests.

### **6.11 Offering and reception of courtesy**

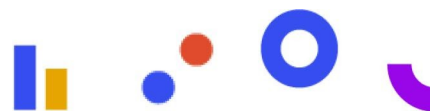
Olist prohibits the offer and receipt of courtesy in order to obtain any consideration or receive advantages of any nature, and also to influence or reward decisions of customers, Suppliers, Public Agents or others.

However, Olist understands that offering and receiving courtesy can be a practice of kindness and cordiality accepted within a legitimate and customary business relationship, but requires caution.

Therefore, giveaways, gifts and hospitality may be offered and accepted if they: (i) have no commercial value; or (ii) are distributed in a generalized manner as a courtesy, advertising, usual disclosure or at special events or commemorative dates, provided that they do not exceed, cumulatively and within the period of one year, the amount of R\$ 100.00 (one hundred reais).

Any offer or receipt of giveaway, gifts and hospitality that exceeds the amount of R\$ 100.00 (one hundred reais) must be evaluated by the Human Resources Department.

In the case of entertainment, the Human Resources Department should be consulted on a case-by-case basis.



## 6.12 Donations and sponsorships;

Olist does not make donations to election campaigns and political parties, as they are prohibited for legal entities.

However, Olist makes charitable donations and sponsorships provided that it is made in compliance with applicable legislation, and there is no purpose to influence the action of a Public Agent, Supplier, customer, company or any person, to obtain unlawful advantage.

Charitable donations and sponsorships should enhance Olist image, benefit society, and be aligned with the business marketing strategy.

In addition, all charitable donations and sponsorships must be made with the conclusion of a statement or contract, which includes anti-corruption clause, and is preceded by a Compliance Due Diligence to be conducted by the Legal and Compliance Management. According to the Compliance Due Diligence result, the Legal and Compliance Management may approve or not the charitable donation or sponsorship.

Olisters shall ensure that the beneficiary institutions conduct periodic accountability in order to prove that donations or sponsorships were intended for the purpose that they were subject to.

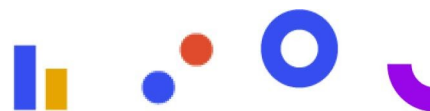
## 6.13 Responsibility for the real estate

Olisters must protect and care for all olist assets, values and rights. Therefore, they must respect and protect the company assets entrusted to them to ensure that they are not damaged, lost, stolen, robbed, misused or wasted, and it is also prohibited to lend, transfer, sell or donate them to third parties.

The work equipment and tools offered by Olist (notebook, mobile phone, headphones and others) are working tools and as such, should be used exclusively for this purpose, and the Olist is liable for the equipment integrity, confidentiality and good use.

The failure to comply with this specific guideline by the Olist may result not only in existing sanctions in labor laws but also those provided for in civil and criminal laws.

In case of loss, theft or robbery the Olist should register the case in a police station, communicating it to his/her immediate manager and delivering a copy of the police report to the manager.



Olisters undertake to use communication tools provided by Olist, such as corporate email, telephone line, VOIP, messaging applications and all other tools, with the sole and exclusive purpose of maintaining contact with other Olisters, company partners, customers and third parties aiming at the proper exercise of their work.

#### **6.14 Preservation of olist image**

Olist image and reputation in the market is undoubtedly one of the determining factors for its success. Each Olist is a representative of the company and as such, should be aware that their attitudes can impact the image and reputation we have built over the years. Therefore, we emphasize the need to take care of your personal image and reputation in the various situations and environments where you are representing Olist, wearing uniform or on the company official social networks.

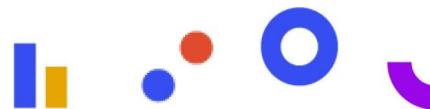
If the Olist has questions about whether the content/manifestation reflects the company position, he/she should seek guidance from his/her immediate manager or the Human Resources Department.

#### **6.15 Accounting records**

All Olist activities must be transparent and formally documented and classified, so that its books and accounting records accurately reflect all its business and financial transactions.

#### **6.16 Corporate operations**

All corporate operations, such as mergers, acquisitions or corporate restructuring proceedings, by Olist, must be preceded by the Compliance Due Diligence to verify the existence of irregularities or illicit acts or the existence of vulnerabilities of the involved company(ies).



## 7. training.

Olist provides training, at least annually, to all Olisters for qualification and awareness about the content of this code. The training completion is mandatory, in person or electronically, and the attendance is controlled through appropriate means.

In addition, at the time of hiring, all Olisters receive admission training, which addresses the content of this code.

## 8. responsibilities.

The **Ethics and Conduct Committee**, with the help of the Legal and Compliance Management, is responsible for guiding and providing clarification on this code, resolving any gaps or omitted points. Questions can be sent via e-mail to **compliance@olist.com**.

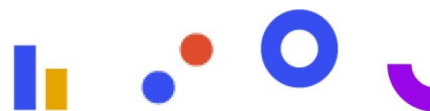
In addition, you can also clarify doubts on our questions & answers page regarding the code, available on Olist website: [www.olist.com](http://www.olist.com).

The responsibility of the Legal and Compliance Management, among other matters, is to:

- Take the necessary measures to ensure the application and dissemination of this Code and even monitor and evaluate its compliance and effectiveness;
- Ensure that the compliance program guidelines are accessible to all Olisters, Customers, Suppliers and other third parties;
- Map Olist compliance risks, keeping the Ethics and Conduct Committee up to date; and
- Propose new internal rules related to the integrity program or the revision of existing ones; and
- Organize training on corporate integrity issues.

The responsibility of the Ethics and Conduct Committee, among other matters, is to:

- Propose actions aimed at continuous strengthening of corporate integrity culture and ethical conduct at Olist;



- Provide guidelines and periodically monitor the activities of the Legal and Compliance Management regarding Olist integrity program, especially regarding the general strategy and prioritization of risk mitigation activities;
- Approve training plans on corporate integrity issues and monitor the results of their implementation; and
- Supervise the periodic review and updating of this code and any other related internal standards;

The Ethics and Conduct Committee has autonomy, impartiality and authority to exercise its duties, and so the instance has sufficient material, human and financial resources, and the possibility of reporting to the highest hierarchical level of Olist, when necessary.

## 9. ethics and conduct channel.

Olist provides an **Ethics and Conduct Channel** and through which all Olisters, Suppliers or anyone, may communicate, report or complain about a non-compliance with laws, regulations, Olist internal regulations or values, including this code.

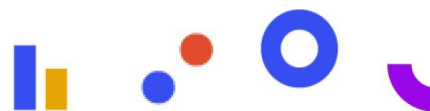
The **Ethics and Conduct Channel** can be accessed free of charge by the following means:

- **Website:** <https://info.olist.com/canaldeetica>
- **WhatsApp:** +55-31-9-8947-7889
- **Phone** 0800-591-1582.

The Ethics and Conduct Channel does not require users to identify themselves, i.e., it is possible to file an **anonymous report**.

Olist guarantees protection against retaliation to any Olisters who makes a report in good faith, even if, at the end of internal proceedings, the report is unfounded or terminated for non-sufficient evidence. However, bad faith Reports that violate Olist Code and, if proven during the normal course of the Report processing, may generate the application of consequences to those responsible.

The independent company Ouvidor Digital is responsible for the initial screening of the information received by the channel. And the Legal and Compliance Management is responsible for



the daily monitoring of Ouvidor Digital system, for performing the internal screening of the Reports and for recording the initial referrals. Reports may be verified by the Legal and Compliance Management, the Human Resources Board or the Ethics and Conduct Committee, as applicable.

To prevent conflicts of interest, any Reports involving members of the Legal and Compliance Management, the Ethics and Conduct Committee or members of the Executive Board shall be sent directly to the Chief Executive Officer of Olist, who shall take appropriate action in his sole discretion.

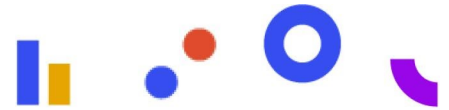
## 10. disciplinary measures and sanctions.

Violations of this code, other Olist internal rules or applicable legislation may subject the Olisters to the following disciplinary measures or sanctions, to be applied by the Executive Board, with the support of the Legal and Compliance Management and the Human Resources Department, without duplication: (i) oral or written warning; (ii) suspension for up to 30 days; or (iii) termination of the employment contract.

If the breach has been committed by a Supplier or Customer, Olist may terminate the contractual relationship.

The consequences described above should be applied according to the criteria of proportionality, gradability and immediacy.

The application or not of any of the above disciplinary measures or sanctions does not prevent Olist from taking any appropriate legal measures, including those related to the remedy of damages, and/or communication to the competent authorities.



## 11. final provisions:

This code is applied with the other internal rules of Olist, even if they deal with the same topic, and the rules here and there contained are complementary to each other.