



# ARTERIS CODE OF CONDUCT

Everyone on the right way



## PRESIDENT'S MESSAGE

Dear Arteris collaborator,

Integrity is a fundamental value for the company, which is why we have developed this Code of Conduct with the aim of presenting the expected rules of conduct that should guide our behavior during our professional activities.

I present to everyone the Arteris Code of Conduct. The material was developed using simple and objective language, incorporating the guidelines and rules established in recent years by the company.

As a company that provides an essential public service, Arteris interacts with regulatory agencies, public administration bodies, surrounding communities, among other audiences. Therefore, our conduct must always be honest, ethical and respectful towards the people with whom we interact, in accordance with the law and guided by our values.

Reading this Code carefully will help you conduct your work activities with integrity and is a key element for any decision-making. It is worth remembering that the company provides tools that help us follow our conduct on a daily basis, such as the Whistleblower Channel, supplier evaluation and our internal rules.

I count on everyone's commitment and responsibility to ensure that the rules and guidelines of conduct set forth in this Code are followed. If you have any questions, do not hesitate to contact the Arteris Integrity Program channels.

Sérgio Garcia



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## 1. CODE APPLICABILITY

This Code applies to all Employees of Arteris Companies, as well as all third parties<sup>1</sup> with which the Company maintains a legal relationship.

## 2. PROTECTION OF COMPANY ASSETS, RESOURCES AND DATA

### **Use Company assets for business purposes only.**

Company assets are to be used for business purposes only, not for personal use.

Everyone has a responsibility to protect and safeguard Company assets from loss, theft, misuse and waste.

The Company's assets are its equipment (e.g. cell phone, computer), objects (e.g. chair), trademarks (intellectual property), information, memos and/or any of its documents.

Company assets must never be used for personal gain, and you must not allow them to be used for illegal activities. If you become aware of theft, misuse or waste of the Company's assets or resources, or have any doubts about their good use, talk to your manager, Compliance, the Compliance Committee or use the Arteris Whistleblower Channel.

Unauthorized removal of assets or resources from Company premises may be considered theft or misappropriation and may result in fair dismissal. In addition, carelessness or waste of Company assets may constitute a violation of your duty to the Company, and may result in the adoption of appropriate legal and/or disciplinary measures.

### **All intellectual property belongs to the Company.**

During the period of employment with the Company or related to it, you may be involved in the creation or development of intellectual property, which includes, but is not limited to ideas, concepts, methods, processes, inventions, confidential information and trade secrets, works of authorship, trademarks, service marks and designs.

All intellectual property and its rights, such as copyrights and patents, are owned by the Company.

You are responsible for collaborating with the Company and providing the assistance necessary to ensure that all such intellectual property rights and related rights become the sole property of the Company, including providing or granting the Company transfers, waivers and other documents that may be requested.

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<sup>1</sup>Third Party: any customer, representative and/or contracted by Arteris, including, but not limited to: partners, consulting companies, brokers, law firms and/or any other service provider or supplier of goods, regardless of written contract or not.

## **Confidential information must always be protected.**

We generally have access to confidential and sensitive information about the Company, other companies, our providers/suppliers, administrators and employees. Preserving the integrity of this information is vital to our business and reputation and is one of the obligations under data protection laws.

Confidential information includes, but is not limited to, all memos, notes, lists, records and other confidential documents in your possession, whether in print or digital format. All of them must be delivered to the Company immediately upon termination of your employment or whenever the Company requests it, and it is your obligation to protect this information even after your employment or contract with the Company ends.

You must also protect printed and scanned copies of confidential information that are taken out of the office (for example, for work outside the office). It is important to be discreet when discussing Company business. This includes not discussing Company business internally, except with people who have the “need to know” information. Also, be careful when discussing Company business in public places, such as elevators, restaurants and public transportation, or when using the phone or email outside the office.

You must also be careful not to leave confidential information in meeting rooms or public places, for example.

## **Protect the confidentiality of confidential information from customers, investors, and others.**

The Company respects the confidentiality of information relating to other client companies and service providers with which, in many cases, it is required to maintain confidentiality by virtue of contractual instruments.

If you become aware of any other company's confidential information while in your position, you must protect it in the same way that you would protect the Company's confidential information. Disclosure of confidential information may be harmful to the Company and may be the basis for legal proceedings against the Company and/or the employee responsible for the unauthorized disclosure.

## **Personal data processed by the Company must be used in accordance with data protection laws.**

The Company has access to personal data of people inside and outside the organization. This is necessary to administer and manage the operation of our business effectively and efficiently. Personal data is information related to the holder, which can be an identified or identifiable natural person, and may include name, address, email, age, marital status, etc., obtained from any type of support (paper, electronic, sound and image etc.).

We store and process personal data in different ways to fulfill our legal, regulatory and other obligations, such as those established under the General Law on Personal Data Protection. Personal data will be retained by the Company only for as long as is necessary to satisfy a legitimate business purpose or fulfill a legal or regulatory obligation.

You must take all reasonable and necessary steps to ensure that personal data is only accessed by people who need this information to perform their tasks. In addition, if it is necessary for the conduct of business to disclose personal data to a third party (for example, so that a third party can provide services to the Company or acquire a Company asset or business), you must ensure that the third party is subject to confidentiality. In other cases, you may only disclose personal data as required by law or regulation.

If the Company transfers personal data to other jurisdictions, it must do so in compliance with all applicable data protection laws.

### **Use of Artificial Intelligence (AI) tools must be used appropriately**

The use of AI tools, such as ChatGPT, Bard, Ernie, Bing, should not be used unless expressly (in writing) approved by the Arteris Information Technology Department.

Despite the benefits that such tools can provide to the company, their use may bring risks related to the protection of confidential information and personal data entered therein, given that information entered into an AI tool is incorporated into the model.

There is a possibility that such information and data may be owned by the product supplier and may be shared with other people outside the organization. Based on the information security, privacy protection and integrity guidelines, the Information Technology Department will evaluate the use of AI tools and must ratify its evaluation and approval with the Arteris Cyber Security Committee and Privacy Committee and Compliance Committee, as applicable.

The Technology Department will monitor the use of AI tools and may uninstall them whenever the above guidelines are not followed by the Arteris employee.

## **3. COMMUNICATIONS AND MEDIA**

### **Appropriately use the various forms of communication and work tools provided by the Company.**

The Company offers its employees access to e-mail, internet, telephones and other forms of communication for corporate purposes.

All business matters must be conducted through the Company's communication systems (examples: corporate email, corporate cell phone, etc.).

The Internet must be used in a professional manner. For example, it is prohibited to access websites with obscene or offensive material, send electronic messages with inappropriate and/or illegal content to a person or a group of people, or send chain letters.

In addition, you must ensure that the security of the internal network is maintained, whether by the proper use of passwords, always personal and non-transferable, or by the proper use of the tools available, avoiding, for example, accessing websites and emails from doubtful origin or character that contain unsolicited links or file attachments.

Employees must not send email containing business information to their personal email accounts, nor save copies of business information on their personal computers or other non-Company electronic devices, unless expressly authorized to do so.

The Company's equipment, means of communication and systems are subject to monitoring, and must be used by the employee for the purposes of conducting the Company's business and performing the activities strictly inherent to their function. When using such means of communication and work tools provided by the Company, do not expect the information sent or received to be private.

**Be cautious when using Social Media.**

Use the Company's information systems properly, keeping in mind that records are permanent. Unless you have express authorization, it is strictly prohibited to comment, post about the Company, or otherwise discuss the Company, its customers, its securities, investments and other business matters in all social media forums, including, but not limited to, social networks, chat rooms, wikis, virtual worlds and/or blogs (collectively, "Social Media"). For more details on the proper use of Social Media, you should refer to the Company's policy regarding communication (Communication Policy).

Please ensure that all your online activities, including your use of social media, are appropriate and do not negatively impact the Company.

And remember, if you associate your image in any way with the Company's image on your social networks, you must respect the principles and rules of this Code of Conduct also in your personal conduct in your manifestations on such networks.

**Do not speak on behalf of the Company unless authorized to do so.**

Do not present yourself on behalf of the Company when engaging in personal, political or non-profit activities, unless you obtain prior written authorization from the Director of your department of the Company.

It is important to ensure that communication to the public is:

- timely, factual and accurate;
- consistent and widely disseminated in accordance with all applicable legal and regulatory requirements.

The Company has professionals who are trained and qualified to provide information to the public. When members of the media, shareholders, financial analysts or government officials contact you or the Company with requests for information, the response can have far-reaching implications, including effects on share price and competition.

When the Company discloses information about its operating strategy, financial results or other relevant information, it must be ensured that the information is accurate and that the timing is appropriate to make it public knowledge. These requirements are of a legal nature and governed by the regulatory bodies of the capital market, which establish consequences for the inappropriate disclosure of information.

If you receive an external request to speak on behalf of the Company and you do not have authorization, forward the request to the Corporate Communications department, which will be in charge of forwarding it to the person responsible for the Company.

Our actions and communications on behalf of or for the benefit of the company must be traceable.





#### 4. CONFLICT OF INTEREST AND PERSONAL BEHAVIOR

**Avoid situations in which your personal interests come or may conflict with the interests of the Company, or others related to it, such as providers and suppliers.**

The Company expects you to act with integrity, avoiding conflicts of interest, real or apparent, in your personal and professional relationships.

A conflict of interest is a situation in which, in carrying out activities, the judgment of the Company's employee may be influenced or may appear to be influenced by an advantage, whether material or immaterial, professional, commercial, financial, personal or for a third party (a relative, for example). This situation may affect judgment or ability to act in the best interests of the Company.

It is not admissible for any employee to get involved in situations that conflict with the interests of the Company and, therefore, the employee must refrain from participating in the decision-making process(es) regarding the hiring or performance of the work of any Third Party or other employee who is, directly or indirectly, related to him/her.

You must formally communicate to the Compliance Committee, through the Annual Declaration of Compliance and Conflicts of Interest or, at any time, through the email address [comite.compliance@arteris.com.br](mailto:comite.compliance@arteris.com.br), any actual or potential conflict of interest situation as soon as you identify it (see the Conflict of Interest Prevention Standard). The Compliance Committee will assess potential cases and will be able to clarify and/or investigate possible conflict situations.

Conflict of interest situations between the Company and the shareholders' companies will be managed by the Company's Board of Directors.

**Remember your duties to the Company when participating in personal outside activities.**

The Company encourages employees to be active participants in their community. When engaging in personal, political or similar activities, whether for-profit or non-profit, be aware that your participation in any outside interest cannot prevent you from properly performing your duties at the Company. Also, ensure that if you are involved in these activities, you will not speak or act on behalf of the Company, regardless of cause or position.

You must refrain from activities that could damage the Company's reputation or disrupt the relationship of trust between you and the Company. You must refrain from maintaining relationships with companies that, in any way, denigrate the image of the Company, its Employees or any of its competitors, consumers, customers and investors.

For more information on the topic you should consult the **Conflict of Interest Prevention Standard**.

## **Get permission before pursuing business activities outside the scope of your role at the Company**

Other business activities include any business activities outside the scope of your role at the Company, including, for example, any activity as a director, advisor, partner of another business organization, regardless of whether there will be financial compensation or not.

Employees must receive approval from the Compliance Committee before accepting another business activity.

However, employees are authorized to serve on boards of philanthropic entities or small private family companies, as long as they are not tied to the Company, do not interfere with the performance of activities at the Company and do not conflict with the interests of the Company. If you are unsure whether you need permission, ask the Compliance department.

## **5. ACCURACY OF BOOKS, RECORDS AND DOCUMENTS AND PUBLIC DISCLOSURES**

### **Ensure that the Company's books and records are always complete and accurate and that all business transactions are properly authorized.**

The Company's books and records must accurately and chronologically reflect, in a reasonable level of detail, all transactions, in order to, among other things, enable the preparation of accurate financial statements in accordance with accepted accounting principles and applicable legislation. Employees responsible for preparing financial statements must record the Company's assets and liabilities to ensure their accuracy.

Ensure that all operations and business are properly documented and authorized by the responsible persons.

The Company's contracts and agreements govern its business relationships. Due to the number and complexity of the laws governing contracts and agreements, the Company has internal regulations to ensure that any contract or agreement entered into has the appropriate level of approval. Therefore, if you enter into contracts or agreements on behalf of the Company, you must follow internal regulations, including prior legal review.

### **Ensure that the Company makes full, truthful and objective public disclosures.**

The Company is required to provide full, truthful, accurate, timely and understandable information in any reports and documents filed or filed with appropriate authorities, as well as in other public disclosures made by the Company.

All employees responsible for preparing the Company's information or that provide information as part of the process have a responsibility to ensure that disclosures and information are truthful, accurate and in accordance with the Company's internal disclosure controls and procedures.

Employees must be aware and report actions involving:

- (a) Fraud or willful errors in the preparation, maintenance, evaluation, review or audit, whether external or internal, of any financial statement or financial record;
- (b) Failures or non-compliances in internal accounting controls;
- (c) False declarations or statements in any public disclosure documents, such as annual or quarterly reports, prospectuses, circulars and press releases; or
- (d) Failures or deviations in reporting accounting and financial information in a complete, truthful and objective manner.

Additionally, employees involved in overseeing financial reporting, and their immediate family members, are prohibited from obtaining any tax or other services from the external auditor, regardless of whether the Company or anyone else pays for such services.

## **6. POSITIVE WORK ENVIRONMENT, DIVERSE AND INCLUSIVE**

**Be committed to maintaining a positive work environment free from discrimination, violence and harassment.**

The Company is committed to maintaining a safe and respectful environment, free from any form of harassment and/or discrimination and/or violence, as well as to promote diversity, equity and inclusion strategies for its employees, third parties and other interested parties (“stakeholders”). For more information on this topic, consult the Diversity and Inclusion Norm.

All employees and third parties, regardless of their position/function, have the responsibility to ensure a safe and respectful work environment, in which the Company's values must prevail, including integrity, safety, constructive dialogue, teamwork and innovation.

Discrimination is the denial of opportunities, through different treatment of an individual or group due to prejudice.

Harassment encompasses a wide range of behaviors, from direct sexual approaches (sexual harassment) to insults, offensive jokes or teasing (moral harassment) that result or could result in a hostile work environment. For more information on the concepts of moral and sexual harassment and discrimination, see **Arteris Positive Environment Management Standard**.

**It is your duty to report discrimination, violence and harassment.**

It is the duty of all employees and third parties not only to avoid undue behavior, but, if identified, communicate it immediately, using the communication channels available and informed in this Code or in the Positive Environment Management Standard.

Reports of discrimination, violence or harassment will be taken seriously and investigated by the Company.

Any employee or third party who practices harassment, acts or threatens to act violently, or discriminates against another person is subject to disciplinary and/or legal/contractual measures.

The Company does not tolerate retaliation against anyone who makes a report in good faith or who cooperates in the investigation of a report.

False allegations made in bad faith by an employee or third party will lead to disciplinary measures for those involved, if employees, or contractual sanctions, if third parties, in accordance with current legislation.

## **7. SAFE WORKING CONDITIONS**

**Commit to ensuring your health and the safety of other employees.**

You have the right to work in a safe and healthy environment. To do this, you must:

1. strictly comply with internal laws and procedures on occupational health and safety;
2. not engage in dangerous or illegal behavior, including any acts or threats of violence;
3. not to carry or use any type of weapon, unless expressly authorized by law/regulation and the Company;
4. not transport or store fuel unless authorized by law/regulation and the Company, and
5. not consume or carry illegal substances or alcohol in the workplace (with the exception of institutional celebrations, in which alcohol may be consumed in a moderate manner, always in accordance with current legislation).

You must report to the Compliance Committee any accident, injury, unsafe practices or conditions, violent behavior or improper possession of a weapon.

If you or someone you know is in immediate danger of serious bodily harm, call the police and then report the occurrence in accordance with the “Complaints and Whistleblowing” section of this Code.

## **8. PROFESSIONAL DEVELOPMENT AND TRAINING**

**Participate in the education and training programs provided by the Company for your professional development.**

The Company undertakes to provide the means to contribute to the learning, training and

updating of knowledge and skills of its employees in order to facilitate their professional progress.

The selection and promotion of employees is based on their skills and performance of their professional functions, as well as on their conduct based on integrity and other values of the Company.

You must participate in the training programs and mandatory training as required and strive to achieve their maximum benefit. For more information on this topic, consult the Arteris Training Standard.

## **9. COMPLIANCE WITH LAWS, RULES, REGULATIONS AND POLICIES**

### **Know and comply with all laws, rules, regulations and policies applicable to your position**

Many of the Company's activities are governed by laws, rules, regulations and policies that are subject to change. If you have any questions about the applicability or interpretation of certain laws, rules, regulations or policies relating to your duties at the Company, you should consult with the Legal Department.

If local laws, customs or practices conflict with this Code, you must follow whichever is more stringent. If you become aware that any Company practice may be illegal, you have a duty to report such fact, see the Complaints and Whistleblowing section of this Code. The lack of knowledge of laws, rules and regulations in general is not a defense to justify its violation. The Company expects you to make your best efforts to be aware of the laws, rules, regulations and policies that affect your activities and to comply with them.

The Company does not tolerate any behavior typified as a crime; therefore it will comply with applicable national legislation, in addition to submitting to the list of prohibited conduct established by its shareholders.

#### **Abertis Code of Conduct:**

[The Abertis Group Code of Ethics\\_20230324083550.pdf](#)

**Brookfield Code of Conduct:** <https://www.brookfield.com.pdf>

#### **Respect the copyrights of third parties.**

Copyright laws protect many of the materials you use in the performance of your duties. Some examples are computer software, books, audio or DVDs, newspapers and magazines. Presentation slides, training materials, management templates, and problem-solving concepts produced by external consultants may also be subject to copyright.

It is illegal to reproduce, distribute or alter such materials without the permission of the owner/holder. You must also obtain permission to use third-party trademarks, logos or names of other companies in any material produced for the Company.

You must respect the copyright of software installed on your computer and network storage areas that you have access to. You may not copy, install or use software in a manner that violates the license agreement for such software or download any materials onto Company-provided computers that may infringe the copyrights of third parties.

### **Respect the Human Rights and Public Liberties included in the Universal Declaration of Human Rights of the United Nations (“UN”)**

All actions of the Company and its Employees must respect the Human Rights included in the Universal Declaration of Human Rights of the United Nations (“UN”) and the principles of conduct and action on human rights of the UN Global Compact of UN.

The Company is therefore committed to conducting business in a manner that respects the protection of human rights, including, but not limited to:

- a. operating with best health and safety practices and security for employees and third parties;
- b. striving to ensure that the interests, safety and well-being of the communities in which we operate are integrated into its business decisions;
- c. eliminating any form of prejudice and discrimination in the workplace;
- d. prohibiting child labor and forced labor and/or labor analogous to slavery;
- e. eradicating harassment and physical and mental abuse in the workplace;
- f. protect freedom of association and expression, and
- g. respect current labor guidelines and rules.

We strive to integrate these standards into all our activities, including training, communications, contracts and due diligence processes, as established in our internal rules.

These practices must extend to the Company's suppliers, among other third parties and/or partners.

We strive to integrate these standards into all our activities, including training, communications, contracts and due diligence processes, as set out in our internal rules. These practices must extend to the Company's suppliers, among other third parties and/or partners.

### **Respect free market competition.**

The Company is committed to competing in the markets promoting free competition for the benefit of communities and citizens and to complying with the laws established in this regard, avoiding any action that represents an abuse or violation of free competition. You must avoid any conduct that could constitute an abuse or unlawful restriction of competition.

## 10. INSIDE INFORMATION AND SECURITIES LAWS

**Do not trade in the Company's securities if you have inside, non-public information or if it is during a period of restriction, or in the securities of any other publicly traded company if you have inside, non-public information.**

Compliance with the legislation applicable to the trading of securities is essential for the Company. As Arteris and its concessionaires are publicly listed, it is imperative that you comply with these laws and regulations, including with regard to the disclosure of information to the public, trading in government bonds and securities, and compliance with applicable laws.

Do not trade or advise trading in the Company's securities, in Brazil or abroad, if you have inside information or during periods of restriction.

If you have inside information, including customer and counterparty information, you should not buy or sell their securities until the information becomes public. Information about a company is considered privileged:

- a) if, by being publicly known, they result, or predictably will result, in a significant change in the market value or price of its shares; or
- b) if there is a high probability that a shareholder or investor will consider them important in the decision to buy, sell or hold securities of that company.

If you are unsure whether the information is privileged or restricted, consult the Legal Department or the Arteris Investor Relations department for guidance before participating in any negotiation.

You are also prohibited from disclosing inside information to others, such as relatives and friends, who may trade in securities or disclose the information to third parties. Securities laws also prohibit such actions, as well as dealings made based on this information.

Restriction periods apply to all employees with access to inside information, including periods when financial statements are being prepared but not yet disclosed. For more information about trading by people who have access to inside information (insider trading), see the Policy on Disclosure and Use of Information and Trading of Securities Issued by the Company.

## **11. DUTIES TO CUSTOMERS, SHAREHOLDERS, SUPPLIERS, COMPETITORS AND OTHER PERSONS**

**Treat customers, shareholders, investors, suppliers, competitors and others fairly and in good faith.**

You must fairly treat customers, shareholders, suppliers, competitors and others (“third parties”). Employees must not engage in any illegal or unethical conduct when doing business with these third parties, preserving the Company's reputation in dealings with third parties.

The processes for selecting the Company's suppliers must follow the principles of impartiality and objectivity. All employees must apply the necessary criteria of quality, opportunity and cost in these processes, always acting in defense of the Company's interests and in accordance with applicable internal regulations. For more information, see the rules of the Company's Purchasing Policy and Norm.

## **12. ANTI-CORRUPTION POLICY**

Do not negotiate, promise, offer, enable, pay, authorize, provide or receive bribes, including facilitating payments<sup>2</sup>.

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<sup>2</sup> Facilitating Payments or “urgency fees” are payments made to secure or expedite routine actions or to induce government officials or third parties to perform routine actions they are required to perform, such as issuing permits, immigration controls or releasing goods held in customs. This does not include administrative fees provided by law. Employees are not authorized to make any facilitating payments, and must ensure that third parties acting on behalf of or for the benefit of the Company do not make such payments on our behalf.





The Company promotes its business with honesty and integrity, and therefore does not tolerate that its employees or third parties promise, accept or offer undue advantages or favors (corruption), directly or indirectly, either for entities or companies in the Public Administration or in the private sector.

Notwithstanding the provisions of the current anti-corruption legislation, any employee or third party hired by it is prohibited from promising, giving or offering, directly or indirectly, undue advantage to any public official or third party related to it or to any entity or person of the private sector, regardless of the existence or not of intention or result.

In this regard, Arteris approved its Anti-Corruption Policy, which must be known and complied with by all its employees and third parties, in addition to complying with the other guidelines and rules of this Code.

### **13. ZERO TOLERANCE FOR MONEY LAUNDERING**

**Do not allow Company operations to be used for money laundering, terrorism or other illegal activities.**

The Company is committed to preventing its operations from being used for money laundering or any activity that facilitates money laundering, terrorist financing or other illegal activities. Accordingly, the Company will take all measures it deems appropriate in order to comply with applicable Brazilian and international laws.

Certain jurisdictions may publish lists of individuals, entities and organizations for which the Company is prohibited from receiving or distributing funds. You must not interact with third parties that are controlled or are acting on behalf of such individuals, entities and organizations subject to restrictions imposed by certain jurisdictions. You must ask contracted third parties to submit declarations of compliance with anti-money laundering practices and not subject to restrictions in the respective contracts or other documents to be signed with the Company.

The Legal Department may, upon request, provide anti-money laundering language to be included in documents with third parties. The Company is responsible for developing and implementing a program aimed at preventing money laundering and economic sanctions arising, with a view to managing the risks of its business in this area.

## 14. GIFTS, BENEFITS AND HOSPITALITIES

**Follow Company policy for giving or receiving gifts, benefits and hospitalities.**

Gifts, benefits and hospitalities offered or received from people who have a business relationship with the Company must follow the guidelines and rules of the Gifts, Benefits and Hospitalities Standard. The Standard provides general requirements for offering and/or receiving these items that are independent of their monetary value, as well as specific requirements for the public and private sectors.

For more details see the **Company Gifts, Benefits and Hospitalities Standard**.

## 15. DONATIONS AND SPONSORSHIPS

**Do not solicit or accept donations or sponsorships from third parties in a way that leads to the understanding that compliance is a condition for future business or an exchange of favors with the Company.**

The Company encourages its employees to contribute their time to charities and NGOs. However, unless the request is supported by the Company through its Social Responsibility Programs, you are prohibited from using the Company's name, resources or material for third-party requests.

The Company carries out institutional representation activities and marketing and commercial initiatives, taking into account both its positioning, the criteria and business strategies to be applied, as well as the elements related to the company culture, this Code of Conduct, the current usages and customs and the applicable legislation.

Provided that in good faith and observing the provisions of specific internal rules, as well as the applicable legislation, the Company may grant sponsorships for the purpose of marketing. Sponsorships are undertaken by the Company to support an event, activity, individual or organization, whether financially or otherwise, including, but not limited to, the provision of products or provision of services, as part of its brand identification, sales or other commercial activities.

Under no circumstances can sponsorships or donations be used as a way to replace a political contribution or represent an undue advantage to a public or private entity (corruption).

Know and comply with the guidelines and rules of the **Company Donation and Sponsorship Policy**.

## 16. POLITICAL CONTRIBUTIONS

### **(A) Political contributions by or on behalf of Arteris**

In view of current legislation, the Company is prohibited from making political contributions, either directly or indirectly. This includes contributions that, directly or indirectly, are made to political candidates, political parties or members of political parties.

## **(B) Personal political contributions by employees**

The Company recognizes that everyone has the right to participate, as citizens, in the political process. Employees may make political contributions in their own name and participate in political activity in their free time and at their sole discretion, without this being associated with their position or with the image of Arteris. The employees: (i) who hold a position in the Senior Management of Arteris or a company of the Arteris Group must not make personal political contributions without prior reporting to the Committee of Compliance, in view of the possible association of their image with that of the Company; (ii) must not use Arteris work hours, property or equipment to perform or support personal political activities; (iii) in any political participation or performance, they must make it clear that their views and actions are personal and not those of Arteris; and (iv) must not request from Arteris any form of reimbursement for personal political contributions.

The Company may not purchase products or services whose benefits are directly or indirectly intended for a political party.

The Company must first analyze the sponsorship projects, as well as the social and cultural projects in which it has planned to participate, in order to verify that they are not related to political contributions.

### **17. DEALING WITH GOVERNMENT OFFICIALS**

The Company does not tolerate that employees or third parties accept or offer, even indirectly, any undue advantage, to public agents, government authorities or employees of private sector companies with which Arteris does business.

Know and comply with the rules of applicable law and the Company's Interaction with the Public Sector Standard in your interactions with people that are part of the public.

Employees must ensure compliance with the Standard of Interaction with the Public Sector of the Company and of this Code by third parties who act as intermediaries (e.g., brokers, attorneys, lawyers, consultants, etc.) before public agents and government authorities, in the name, interest or benefit of the Company.

### **18. ENVIRONMENTAL PROTECTION**

**Protect and respect the environment and minimize negative environmental impacts, constantly monitoring the development of the different activities in which you participate.**

The Company is committed to protecting and respecting the environment and thus carries out its activities under the premise of minimizing negative environmental impacts and preventing contamination, promoting the development and continuous improvement of environmental management that improves its processes, seeking adequate training of its employees and third parties on environmental management.

You must protect and respect the environment, work with maximum energy and natural resource efficiency and respect the preservation of biodiversity, putting into practice the knowledge acquired and constantly monitoring the development of the activities in which you participate.

### **Commit to the community**

The Company is committed to developing and promoting initiatives focused on improving the quality of life of people in the communities where it operates and in the environment in which it operates.

This commitment is practiced through the Programs developed by the Company's Sustainability department.

You are expected to be proactive and participatory in line with this commitment to the community. The participation of employees in social actions must be carried out in accordance with existing internal regulations and in a transparent manner, without seeking personal benefit and promotion.

Social actions, under no circumstances, may be used as electoral propaganda acts or as a means to obtain undue advantage (corruption) from a public official or private entity, in a veiled manner or not.

The company provides public services to society, building and managing safe and sustainable infrastructure. The infrastructure we manage is a public domain asset that we must protect. To do so, we must comply with applicable legislation and/or internal regulations and/or contracts entered into by the Company.

## **19. COMPLAINTS AND WHISTLEBLOWING**

You must act proactively by asking questions, seeking guidance and reporting any violations or suspected violations of the Code, the Company's internal regulations, or any applicable law or regulation.

Reporting facts internally is fundamental for the Company's success, in addition to being the expected and valued conduct.

You have a duty to promptly report violations to your manager, or to the Compliance Committee, through the available email or using the Arteris Whistleblower Channel.

**The most important thing to remember when dealing with this topic is: when in doubt, seek guidance from the Compliance department or the Compliance Committee.**

## **20. COMPLAINTS HANDLING - WHISTLEBLOWER CHANNEL**

Complaints reported by employees or third parties will be treated confidentially by Arteris. Arteris has a free and confidential communication channel, allowing anonymous or identified reports (“Arteris Whistleblower Channel”). Information about the Whistleblower Channel is available on the Intranet page – Portal Arteris and on its website.

The Whistleblower Channel is a direct communication channel, open to employees and third parties. Trained attendants receive calls made to the Whistleblower Channel. After receiving the call, which can be anonymous, the operator provides a registration number for the complainant so that they can use it if they make new contact. The complaint can also be made via the web or via the Channel's e-mail.

After registering the complaint, a written report is sent to the members of the Compliance Committee and to Arteris' Internal Audit, the latter being responsible for carrying out the investigations, with the possibility of confidentially involving other departments of Arteris, depending on the theme, or from external service providers.

When whistleblowing, include as much information and detail as possible, including evidence of what is being reported if you have it. Vague, non-specific claims or without sufficient information for analysis are more difficult to ascertain and may even make evaluation impossible.

## **21. NO REPRISAL OR RETALIATION**

Employees will not be punished for asking questions or making reports in good faith about any violations or suspected violations of the law, regulation or internal rules of Arteris.

The Company does not tolerate reprisal or retaliation against anyone who makes a report in good faith or cooperates with an investigation regarding an alleged violation of the law, regulation or internal rules of Arteris.

Disciplinary measures will be applied to any employee who attempts or actually retaliates against any whistleblower, whether another employee or third party.

False allegations made in bad faith by an employee or third party will lead to disciplinary measures for those involved, if employees, or contractual sanctions, if third parties, in accordance with current legislation.

## **22. LEGAL AND DISCIPLINARY MEASURES FOR CODE VIOLATIONS**

We reserve the right to take appropriate legal and/or disciplinary action for any violation of the rules of this Code. This may result in immediate fair dismissal and, as the case may be, legal proceedings may be instituted against the employee or third party involved.

## 23. ANNUAL DECLARATION ON CONFLICT OF INTEREST AND COMPLIANCE

Upon joining the Company, each employee will have access to this Code (whether printed or electronically) and will be asked to read and declare receipt of this document, in the form of the Declaration of Conformity.

All employees must annually complete the **Annual Conflict of Interest and Compliance Declaration and Questionnaire** made available by the Company to confirm adherence to this Code, Company policies and standards.

The annual completion of this document will be a condition for the continuity of the relationship with the Company.

## 24. EXCEPTIONS OR WAIVER

Exception assessments related to the subjects of this Code must be forwarded to the Compliance Committee, by any available means.

The company's Compliance Committee reviews this Code at least once every four years and is ultimately responsible for its compliance control.

This Code will enter into force on the date of its disclosure, revoking and replacing any previous communication on the subject<sup>3</sup>.

## 25. NOTIFICATION TO READER

The Company reserves the right, in whole or in part, to modify, suspend or revoke this Code and any related policies, procedures and programs at any time.

The Company also reserves the right to interpret and change this Code and its policies in its sole discretion. Any changes to this Code will be disclosed and reported as required by law.

The Company employs unionized employees. If the Code conflicts with a specific provision of a collective agreement or convention that governs salaries, terms and/or conditions of work for employees who are part of or are represented by unions, the collective agreement or convention will prevail over this Code. If a collective agreement or convention is omissive on any part of this Code, or if this Code supplements a collective agreement or convention, employees who are part of or represented by unions must comply with this Code.

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<sup>3</sup> The Arteris Code of Conduct was approved by its Board of Directors on 07/25/2013 and underwent revisions on 05/25/2016, 01/21/2020 and 31/07/2024.

Neither this Code, nor any policies mentioned in this document, confer any rights, privileges or benefits to employees, or create the right to maintain the employment relationship with the Company, establish employment conditions or create, expressly or implicitly, an employment relationship of any kind between employees and the Company. In addition, this Code does not modify the employment relationship between employees and the Company. This Code is posted on the Company's website and/or intranet.

The version of this Code published on our website and/or intranet may be more updated and replaces any printed version in case there is any discrepancy between the printed version and what is available on our website and/or intranet.

## 26. CONTACT INFORMATION

### ARTERIS WHISTLEBLOWER CHANNEL

- [email: arteris@canalconfidencial.com.br](mailto:arteris@canalconfidencial.com.br)
- Website: [www.canalconfidencial.com.br/arteris](http://www.canalconfidencial.com.br/arteris)
- Telephone: 0800 721-0741, available Monday through Friday, 9 am to 5 pm.



## 27. QUESTIONS AND REPORTS

### Compliance Committee

- [email: comite.compliance@arteris.com.br](mailto:comite.compliance@arteris.com.br)
- Telephone: +55 (11) 3074-2404





**A vida em movimento**

Av. Presidente Juscelino  
Kubitschek, 510, 12º andar  
Vila Nova Conceição  
São Paulo - Brasil  
CEP: 04532-002

Telefone: (+55 11) 3074-2404  
[www.arteris.com.br](http://www.arteris.com.br)