

Code of Ethics and Conduct

Meta's policies are documents designed to guide the company's relationships through established principles.

_Our purpose

Human growth through technology

Our values

-  We are people **serving people**
-  We grow and learn **together**
-  We think and act **like owners**
-  We strive for **performance**
-  We pursue **excellence** and **simplicity**
-  We act with **innovation** and **creativity**

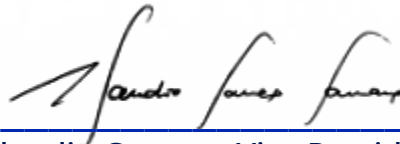
LETTER FROM THE VICE PRESIDENT

Meta prioritizes excellence and quality in everything it does, and our Code of Ethics and Conduct is founded on the principles and values that guide the company. It ensures that our relationships with all stakeholders are conducted ethically, transparently, and with integrity. Meta's primary directive is full compliance with laws and regulatory guidelines, as outlined in our Integrity Program and our Code of Ethics and Conduct.

Our Code of Ethics and Conduct sets ethical and integrity standards that go beyond legal requirements. It formalizes Meta's commitment to legality and full transparency, which is reflected in robust and consistent governance across the organization. These standards apply to all employees—regardless of position—as well as to clients, partners, suppliers, and any third parties acting on behalf of Meta.

Therefore, everyone working at or on behalf of Meta must strictly adhere to the principles and values expressed in our Code of Ethics and Conduct, our Integrity Program, and all company policies.

It is our mission to uphold these standards of conduct, and we recognize that it is everyone's responsibility to reinforce them—ensuring that Meta remains a company built on integrity and trust.

A handwritten signature in blue ink, reading "Claudio Carrara", is positioned above a horizontal blue line.

Claudio Carrara, Vice President

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● 1. Purpose

Meta's Code of Ethics and Conduct is a set of rules that defines and guides the actions of all employees, with the main objective of formalizing the standards of conduct for all members of the organizational structure, aiming at ethics and integrity in the company's relationships.

Through this Code, Meta formally commits to respecting and complying with all laws and regulations applicable to its business, as well as to acting to prevent and combat corruption, especially in compliance with Brazilian law (12.846/2013 and 11.129/2022) and the laws of other locations where it operates or may operate in the future.

● 2. Scope

This Code applies to all employees, interns, apprentices, service providers, executive directors, partners, and members of Meta's boards and committees.

Each employee has a duty to reinforce compliance with the rules contained in this Code of Ethics and Conduct with coworkers, internal and external customers, partners, suppliers, and any third parties acting on behalf of Meta.

● 3. Integrity and transparency

Always act with integrity, honesty, and sincerity in all relationships. Uphold ethics, morality, transparency, and compliance with the law and sound market practices. Base your decisions on objective criteria, always seeking the company's best interests in terms of cost-benefit analysis. Personal gains and advantages—as well as friendships and family relationships—must not influence decision-making.

Transparent and objective relationships help foster an environment of trust and long-term partnerships.

● 4. Senior management commitment

Senior management commitment is fundamental to the success of this Code. We consider each leader to be a key player and part of our strategy. Our leaders are responsible for developing an environment conducive to the dissemination and compliance with the guidelines contained in this Code of Ethics and Conduct, and must guide their teams through examples of appropriate conduct in order to promote a culture of ethics and compliance. As such, they must observe the guidelines set forth in the Duties of Senior Management (APPENDIX I).

● 5. Relationship with employees

The relationship with employees is welcoming and always based on respect and equality. It is everyone's duty to ensure this environment, and it is up to leadership to set an example.

Meta values respect and dignity for all. All employees must treat each other with respect, dignity, and equality. No form of harassment, whether sexual or moral, abuse, or discrimination based on race, ethnicity, color, religion, sex, or gender is permitted, and no conduct that violates human dignity is allowed.

Therefore, personal and emotional issues should not interfere with the work environment. Good relationships may involve a natural and positive bond of friendship between people, but it is expected that the focus and priority of relationships within the company be professional and work-related.

● 5.1 Family ties and emotional relationships

Hiring relatives for positions that involve a direct hierarchical relationship with Meta employees is not permitted. Relatives are defined as individuals related by blood—such as parent and child, grandparent and grandchild, siblings, uncles/aunts and nieces/nephews, cousins—or by affinity, such as in-laws, spouse or partner, stepparent and stepchild, among others.

Romantic relationships between managers and subordinates are also not permitted. In cases where there is a family relationship and/or romantic relationship between employees, even if they work in different areas, that could influence the impartiality of decisions, one of the parties must declare themselves unable to continue working directly with that area.

● 5.2. Drugs and carrying weapons

Employees may not consume or be under the influence of illegal drugs or narcotic substances on Meta's premises, or perform external activities related to these while under the influence.

It is also not permitted to carry or keep any weapons on Meta's premises or in external activities related to it, except for professionals duly authorized by law and by contract to do so.

● 5.3. Side jobs

All Meta employees are free to have a second job or other forms of supplementary income; however, certain situations should be avoided so as not to harm the company's interests:

- Employees may not engage in any other activity during their working hours or that impairs their performance at Meta;
- Even outside working hours, side jobs can't conflict with Meta's business, interests, or industry.
- Employees or their spouses may not provide services or be suppliers to Meta, even outside working hours or through companies in which they are partners. Exceptions to this rule must be approved by the executive board, with the knowledge of the Compliance department.

● 5.4. Associations and professional bodies

Meta employees are free to join and participate in legal associations for various purposes, including professional associations, such as unions. However, employees are not authorized to use Meta's property or resources for personal purposes.

Meta respects the right of each employee, as a member of a professional association and/or union, to participate in collective bargaining and, consequently, to enjoy its results.

● 5.5. Political activities

Due to its non-partisan stance, Meta does not contribute financially to political parties, candidates and their representatives, unions or any political organizations, in accordance with national legislation and as set forth in its Policy on Relations with Public Authorities.

Employees are free to join political parties and run for political office, but they may not use any information, assets, or resources belonging to Meta for political activities. When running for political office, employees must inform the Compliance department so that a conflict of interest can be assessed.

Employees are also prohibited from wearing any clothing or objects with political connotations on Meta's premises or in its communication and relationship channels, or externally while representing Meta. Similarly, employees are prohibited from using company-owned electronics to disseminate political news and conduct campaigns.

● 5.6. Gifts, presents, and hospitality

Our employees, managers, third parties, and representatives must not accept or offer gifts and/or favors, promise or grant anything of value, or even without direct or indirect value, to a public official or their family members that could influence any business decision or obtain an improper advantage, as provided for in Law No. 8.112/90.

As for private sector individuals, as a rule, the sending or receiving of gifts or presents whose value exceeds that provided for in [the current Gifts, Presents, and Entertainment Policy](#) should be avoided, and professionals must always ensure that such sending/receiving does not conflict with the rules of Meta or the company with which the private sector individual has any connection.

Meta employees may not request gifts, presents, hospitality, or any personal benefits or discounts from Meta's business partners. Invitations to technical, cultural, and sporting events of any value may be requested and accepted, provided they are offered on an institutional basis (not nominal) and approved by Meta's executive board. Special cases must be evaluated and authorized by Meta's Compliance department.

● 5.7. Social media

All Meta employees are responsible for their own image and represent the company in the virtual environment. It is important that resources such as social media are used conscientiously. Below are some best practices for your interaction in these environments:

- You are part of Meta, so when expressing yourself on social media, always uphold the company's positive image;
- If you notice something you don't like, you have the opportunity to suggest an improvement by addressing the issue internally. Use the right channels. At Meta, everyone is encouraged to bring any criticism and suggestions to the attention of leadership for discussion. Be an agent of change at Meta and use the right channels to address problems and suggest improvements;
- Everything on the internet is permanent. Complaining on social media does not lead to improvements for the company and also impacts its image, either directly or indirectly;
- Before posting anything, whether related to the company or personal information, it is important to be aware of the reach, risks, and possible benefits;
- Express yourself on social media guided by the same ethics as in the non-virtual environment;
- Be careful with your opinions. Once they are posted online, they become public;
- Do not expose customers, colleagues, and partners. Without prior authorization, this may constitute a violation of image rights and, in some cases, privacy. This also applies to photos and tags;
- Never publish confidential information about Meta;
- Do not speak on behalf of Meta in discussions. In such cases, contact the Legal and Marketing departments;
- Do not engage in bullying or prejudiced comments;
- Do not share inside jokes or expose your or your colleagues' private lives;
- Do not let social media affect your productivity.

● 5.8. Conflict of interest

A conflict of interest arises when, for their own interest or that of third parties, an employee acts or is influenced to act against Meta's objectives and principles, making some kind of inappropriate decision in which they prioritize their personal interests or those of third parties, failing to fulfill their professional responsibilities.

In addition to the situations described above, the following situations of conflict of interest are characterized, but are not limited to:

- I. Conducting business unrelated to Meta with a business partner, supplier, or active customer with whom you had contact during your employment with Meta;
- II. Seeking business opportunities for oneself or third parties that harm Meta in any way;
- III. Using confidential or privileged information for personal gain or for the benefit of third parties;
- IV. Receiving any personal benefit from a supplier, customer, competitor, or any other organization that has a business relationship with Meta;
- V. With a Meta supplier or business partner, when you have the power to influence their hiring decision, especially if that person is the owner or executive of the partner company.

If these or other situations of possible conflict of interest arise, they must be immediately reported to your manager or to the People and Performance or Compliance departments, so that alternatives can be evaluated to minimize the risk. For more information, access the [Anti-Corruption and Anti-Bribery Policy](#).

● 5.9. Work environment

All employees must focus on their professional activities and use company assets and materials conscientiously, contributing to the conservation and preservation of assets, always complying with sustainability and environmental protection policies. A safe and healthy work environment is built by everyone. Here are some rules:

- Keep your workspace clean and organized;
- Use common sense when using your cell phone for personal matters during working hours;
- Speak appropriately, without exaggerated gestures or raised voices, avoiding profanity, slang, and attitudes that could be considered rude;
- Dress in a manner consistent with the work environment.

● 6. Relationships with third parties

Meta values building solid, lasting, and trusting relationships with all its stakeholders: employees, customers, partners, suppliers, and society in general.

Therefore, it maintains its credibility by always acting with transparency and honesty, committing to its word and to the agreements signed.

● 6.1. Relationship with partners and suppliers

Relationships with our partners and suppliers are based on transparency and impartiality.

Partnerships and supplier contracts will always be based on technical, professional, ethical, and legal criteria, meeting the company's needs and respecting the guidelines established in this code and in [the Third-Party Relationship Policy](#).

Meta prohibits any practice of differential treatment of anyone for reasons of interest and/or favoritism.

By disseminating this Code to its business partners, Meta encourages the adoption of integrity mechanisms, especially in the development of measures to combat corruption, unfair competition practices, fraud of any kind, and other illegal acts against public administration.

● 6.2. Customer relations

We are committed to excellence for our customers. Everyone must be served with transparency and efficiency, in the search for solutions that simplify and generate real value in the day-to-day operations of organizations, and everyone must strive to deliver the best solution for our customers' businesses.

It is not permitted to disclose operational information related to Meta or the customer without prior authorization from the company, as well as requests related to contractual matters, such as information on salary, benefits, working hours, among others.

● 6.3. Relationship with competitors (competitive practices)

Meta is committed to free competition, and we must act fairly and in accordance with the laws applicable in each country where we operate. We prohibit any conduct or action that promotes or encourages the formation of cartels, market division among competitors, price manipulation or unfair conduct among competitors, bribery, espionage, intellectual property infringement, receipt of confidential information or other practices harmful to public administration or society.

If contact with competitors is necessary, we must not disclose or encourage discussion of prices, sales conditions, commercial and business strategies with customers and suppliers, or other strategic and/or confidential information about the organization. For more information, see the [Third Party Relationship Policy](#).

● 6.4. Relationship with public authorities

Meta maintains an ethical and transparent relationship with government agencies, and does not tolerate any type of payment, whether in cash, gifts, services, or any other benefit, for the purpose of bribery, facilitation, or special treatment.

All professionals acting on behalf of Meta, when interacting with representatives of public agencies, must respect the ethical principles established in this code, as well as the guidelines established and

formalized in our [Public Relations Policy](#) and any other related laws.

The activity of obtaining or renewing licenses, permits, or any operating authorizations must always occur through official channels, without any personal involvement, promise, or exchange of undue advantages between the parties.

● 7. Donations and sponsorships

Meta prohibits any donation or sponsorship on its behalf to politicians, labor unions, political parties, candidates for political office, or public officials.

Donations shall only be made for philanthropic purposes and in support of humanitarian, educational, or cultural causes, subject to an evaluation of evidence confirming the true intent of the donation. All donations must be approved in advance by the Compliance department.

Sponsorships, on the other hand, must be made for the purpose of promoting and enhancing recognition of the Meta brand, and must be approved in advance by the Marketing department.

Donations and sponsorships to obtain immediate or future advantages are not permitted, nor may donations be understood in any way as an exchange of favors. For more information, access the [Anti-Corruption and Anti-Bribery Policy](#).

● 8. Anti-corruption and anti-bribery policy

Meta has developed a specific policy that establishes guidelines to be followed by our employees, customers, partners, and suppliers to comply with anti-corruption laws. In all its relationships, Meta does not engage in or condone unfair competition practices, as well as practices prohibited by anti-bribery and anti-corruption laws.

Meta does not tolerate any form of public or private corruption, including, but not limited to: bribery, embezzlement, extortion, illegal agreements, facilitation payments. It is prohibited to offer, give or commit to give, to anyone, or accept or commit to accept, from anyone, either on one's own behalf or through interposed person, any payment, donation,

compensation, financial or non-financial advantage, or benefits of any kind that constitute illegal or corrupt practices under the laws of any country, whether directly or indirectly. For more information, access [the Anti-Corruption and Anti-Bribery Policy](#).

● 9. Treatment of confidential information

Information relating to Meta's business, whether relating to strategy, projects, trade secrets, copyright, employees, customers, suppliers, service providers or other business partners, and which is not in the public domain, must be treated as confidential.

Confidential information must not be disclosed to the public, except when required by the nature of the business. It must also not be shared with other employees who are not aware of it and are not involved in or supporting a specific project and do not need it.

Employees may not use confidential information for personal gain.

● 10. Protection and privacy of data

Professionals acting on behalf of Meta must comply with the provisions of the General Data Protection Law (Law No. 13.709/2018) and take appropriate measures to ensure that personal data processed internally is accessed only by authorized persons in the performance of their duties. In the activities carried out, if it is essential to disclose personal data of third parties, it must be ensured that the respective data subject has consented to its collection and processing, requiring the signing of a Consent Form specifying the purpose for such disclosure.

● 11. Information security

All employees have a duty to put safety first when exploring the full potential of the internet at work, whether in person or remotely.

As such, Meta is concerned with information security and has a policy that details and guides the practices to be adopted by all employees and/or partners.

Principles of good practice:

- Each employee's credentials, whether badges, logins, or passwords, are individual and may not be shared with third parties under any circumstances, including other company employees.
- User accounts for accessing Meta's systems, email, or internal networks are personal and non-transferable and must be updated periodically;
- Corporate email should only be used for work-related business purposes;
- Do not share confidential information;
- Access to any website through Meta equipment is restricted to activities necessary for good professional performance, and Meta reserves the right, without prior notice, to block and monitor the use of the internet by employees or partners. Inappropriate use of the internet is strictly prohibited.

For more information, please refer to the [Information Security Policy](#).

● 12. Company property and resources

Everything produced by Meta employees in the performance of their duties is the property of the company, and it is not permitted to delete, destroy, or take such information when the employment relationship with the company ends.

It is the duty of all employees to use Meta's assets in the best interests of the company and to protect them from inappropriate use so that they are not depreciated, misused, stolen, damaged, broken, or lost. Employees must use and maintain these assets as if they were their own and must not use them for personal purposes.

Meta instructs its employees not to store any personal data on company software or equipment.

Meta may request and remotely access all assets and resources made available to employees, without their knowledge or consent. In this regard, with due respect to applicable laws, the company may access, review, copy, collect, export, transfer, and capture images of any data (including personal information) stored in corporate email accounts, as well as any other software or equipment owned by it.

All communication with Meta's customers, suppliers, service providers, and other business partners must be carried out through the official means provided by the company, and no other communication tool or platform that has not been expressly approved and authorized by the company may be used.

The use of other tools, whether paid or free, must always be expressly authorized by the Information Technology and Security department.

● 13. Accounting records

Meta ensures that the accounting records of its operations, as well as the documentation that supports them, are complete and accurate, in full compliance with Brazilian accounting laws and principles and those of other countries where it has or may establish business relationships.

The practice of money laundering is not tolerated by the company, nor are other financial and accounting irregularities that may harm the public administration.

● 14. Labor legislation

Meta operates in accordance with the laws, collective agreements, and regulations applicable to labor relations. As such, it hires people according to their ability to perform the proposed work, respecting labor laws, conventions, and collective agreements, providing a dignified and decent working environment for employees in all its operations.

● 15. Training

It is the duty of all employees, service providers, and representatives to complete all training indicated by the company as essential for the performance of their position or function. Such training is intended to promote awareness of relevant topics and enable professionals to act in certain situations.

● 16. Social and environmental responsibility, health, and safety

Meta repudiates any practices analogous to slave labor, which includes not only forced labor, but also exhausting working hours, degrading conditions, and subjection of workers to employers, regardless of consent or whether carried out through fraud, threats, violence, or coercion.

Meta does not use illegal child labor and does not employ workers under the age of 16 (sixteen), except as apprentices, starting at the age of 14 (fourteen), in accordance with Law No. 10.097, dated December 19, 2000, and the Consolidated Labor Laws. Meta also does not employ adolescents up to eighteen (18) years of age in places that are harmful to their education, physical, mental, moral, and social development, as well as in dangerous or unhealthy places and services, at times that do not allow them to attend school, and at night, considered to be the period between 10:00 p.m. and 5:00 a.m.

Thus, Meta does not allow any form of child labor, slave labor, or illegal labor, and reserves the right not to hire services or have business relationships with organizations that do not comply with this determination.

Similarly, Meta conducts its business and operations with full respect for the rights of minorities and indigenous peoples, whether they are internal employees or members of civil society. This includes their rights to land, forests, and water, so as not to participate in or conduct any illegal forced evictions. This same commitment is required of third parties with whom Meta has a relationship.

Internally, the safety and health of employees are priorities for Meta, which operates all businesses with strict quality standards and compliance with occupational health and safety laws and regulations, providing all necessary PPE (Personal Protective Equipment) for the regular performance of each activity.

In cases where the use of force, whether public or private, is necessary to protect Meta's operations, those responsible for security must have the technical capacity to perform their duties, and under no circumstances may they violate the human rights of employees and others involved, such as torture, excessive or cruel force, or even inhumane and humiliating treatment.

Meta is also committed to complying with all sustainability and environmental protection policies, recognizing the importance of the preservation and conscious use of natural resources.

● 17. No retaliation

Meta repudiates any discrimination or retaliation against employees or third parties who, in good faith, report violations, offenses, or even suspicions. Meta provides a Reporting Channel for all its employees, third parties, and society in general to report any violation or suspected violation of the principles defined by this code, laws, and other policies in force.

Meta is committed to investigating all reports, maintaining the confidentiality of those who reported and/or participated in the investigation, and never seeking to identify those who chose to remain anonymous.

All complaints will be evaluated and penalized by the Ethics and Integrity Committee, and if proven, may result in disciplinary measures ranging from warnings to termination, depending on the severity.

For more information, please refer to our [Complaint Investigation Policy](#).

● 18. Violations and penalties

Failure to comply with this Code will result in penalties based on the severity of the offense, which may include corrective measures such as verbal or written warnings, suspension, transfer to another position or area, dismissal with or without cause in the case of employees, and immediate termination of the contract and relationship with the supplier, partner, or customer.

In addition to the sanctions provided for in this Policy, if the violations constitute a crime, Meta may notify the competent authorities, or take the appropriate administrative or legal measures, or take any measures it deems appropriate for the case.

● 19. Final considerations

I am aware of conduct that violates the provisions of this Code of Ethics and Conduct. How should I proceed?

If you are aware of any conduct by an employee, partner, or supplier that violates the provisions of this Code of Ethics and Conduct, report it immediately to your direct manager or use the Reporting Channel.

Do not be complicit or an accomplice to any violation of this Code. No employee will suffer any kind of punishment, retaliation, or negative consequences for reporting unethical conduct. Be a guardian and enforcer of the principles set forth herein to ensure productive and healthy relationships in the workplace.

● APPENDIX I - Duties of senior management

The solid senior management structure to which we adhere implies accountability and completely transparent relations with employees. The commitment of senior management is fundamental to the company's success. All leaders must be examples of appropriate conduct to promote a culture of Ethics and Compliance (E&C). To this end, they must:

- I. Lead by example, adopting proactive attitudes and behaviors consistent with our values.
- II. Ensure that those under their supervision understand their responsibilities under the Code and other policies and apply their content in their daily work.
- III. Read, understand, comply with, and enforce the Code of Ethics.
- IV. Take advantage of opportunities to discuss the Code and reinforce the importance of Ethics and Compliance to employees, Service Providers, and Business Partners.
- V. Create an environment in which employees feel comfortable raising issues and concerns they may have, as well as asking the right questions when faced with ethical dilemmas that may arise.
- VI. Take into account effective compliance with the Code and other company policies when evaluating employee performance, including with regard to bonuses and promotions.
- VII. Never encourage or direct employees to achieve business results at the expense of ethical conduct or non-compliance with this Code or the law.
- VIII. Always act to prevent violations of the Code or the Law by those you supervise.
- IX. Disseminate the Code in your area of activity and ensure that it is read and understood, and that people are adequately trained in the content of the Code, even in more didactic versions, to meet the specific needs of each group of people.

- X. Guide Employees on actions or situations that may raise ethical questions or dilemmas, always complying with the principles of this Code, and encouraging them to use the ethics hotline when necessary.
- XI. Participate directly and encourage your subordinates to participate in all awareness, communication, and corporate training activities related to the topics covered in this Code.
- XII. If approached with a question or concern related to the Code, listen and give the employee, service provider, or business partner your full attention, answering any questions they may have, but do not feel obligated to give an immediate or definitive answer. Seek help from the Compliance department if necessary.
- XIII. If an employee, service provider, or business partner mentions a concern that may require a more detailed and specialized analysis of the situation, recommend that they escalate the matter through the Reporting Channel.

ACKNOWLEDGEMENT AND ACCEPTANCE OF THE CODE OF ETHICS AND CONDUCT AND POLICIES

I declare that I have read and understood the Code of Ethics and Conduct, as well as all other policies mentioned in this document. I am aware of its importance to Meta and to the proper performance of my duties. I am aware that failure to comply with the Code of Ethics and Conduct and policies will subject me to corrective measures.

I further declare that I am aware that the Code of Ethics and Conduct and other policies mentioned are available for consultation at any time at www.compliance.meta.com.br/en and that in case of questions or to report facts and behaviors that are not in accordance with Meta, the reporting channel is available at www.compliance.meta.com.br/en.

This Acknowledgement and Adherence to the Code of Conduct and Policies is an integral part of the Onboarding process.

Signature



**For further information
or inquiries, please
contact:**
compliance@meta.com.br