



Code of Ethics and Behavior

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Letter from the CEO

Since **ilia**'s foundation in 2013, we have emphasized creating a strong culture that contributes to building simple and creative digital products and solutions. Today, the **ilia** way of being and doing is a significant differentiator appreciated by our clients.

This community, which includes our entire team and partners, has a collective responsibility to maintain and continually strengthen the culture developed over the years, which is marked by respect, diversity, and personal and professional growth.

This document is a summary of what defines us as a community. Here, we highlight everything we value and strive for, to ensure our growth remains fair, ethical, and sustainable.



Emmanuel Orillard
CEO

Summary

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Who are we?

We are **ilia**, a technology company specialized in the financial, insurance, and mobility sectors.

Our mission is to support our clients in achieving their business objectives through digital solutions and products, using technology as a means to reach these goals.

In doing so, we positively impact both the companies and the individuals involved in this process.

After all, we believe that businesses are made by people, for people, and we are focused on fostering strong human relationships.

This Code of Ethics and Conduct was created to clarify the mission, culture, values, ethical principles, and conduct standards of our organization.

Our values guide decision-making and ensure that professional activities are carried out in compliance with the law and the highest ethical standards.

We value relationships that are honest, transparent, impartial, and respectful of people. We are committed to ensuring a harmonious work environment free from any form of illegality.

Values that guide ília:

Learning, Creativity,
Ownership, Teamwork,
Customer-centricity,
Diversity.

We put our **values** into practice through the following **attitudes** .

Learning

Being curious and open to new ideas. Being proactive in sharing knowledge and concepts.

Creativity

Being a creative thinker. Being bold and collaborative.

Ownership

Taking initiative to generate positive results. Being responsible for the outcomes of your actions.

Teamwork

Recognizing the power and importance of the group. Being an active listener and acting towards the common goal.

Customer-centricity

Having a passion for building positive experiences and generating awesome results for our customers and our customers' customers. Being proactive.

Diversity

Actively seeking solutions to create an increasingly inclusive work environment. Being creative, innovative, and tolerant.

What does it demand and who should follow it?

This document is an ília governance guide

All guidelines are to be known and respected by everyone acting on behalf of our company.

We encourage you, as a member and partner of **ília**, to read, understand and encourage others to practice our principles.

It is important that you do not omit yourself. If you have any questions or feel that someone else is not complying with this document, speak up.

Relationship with the team

How is our relationship with the team?

We repudiate any form of discrimination, whether it be based on religion, philosophical or political beliefs, nationality, origin, gender, age, color, sexual orientation, or physical or mental disability.

We value harmony among individuals, the exchange of knowledge, and cooperation within the team, regardless of the area or company which one works in.

We encourage the sharing of information, as long as it adheres to the confidentiality criteria outlined in the "Information Security" section.

How is our relationship with shareholders and managers?

Communication must be precise, transparent, and appropriate. Managers should act as follows:

- Exhibit model behavior to set an example for the entire team.
- Communicate the contents of this Code to their subordinates and raise awareness about its necessity and usage.
- Identify individuals who have violated this Code and discuss the matter with the Board of Directors.
- Foster a culture of consulting this Code and encouraging the entire team to follow and apply it in their daily activities.

How is our relationship with clients?

In our relationships with clients, ethics should always prevail through clear, honest, and transparent communication.

Everyone on the team should be committed to treating clients with courtesy and efficiency, always striving to provide responses to requests appropriately and within the expected timeframe.

Therefore, it is a fundamental principle to serve the client, with an emphasis on quality, productivity, and innovation, along with social, community, and environmental responsibility, and with full respect for the laws and regulations of each product and region in which we operate.

How is our relationship with competitors?

The services provided by **ilia** are present in various countries, as we serve clients from around the world. This means that our activities have an impact on the market in each region where we operate. Therefore, we have a duty to understand and comply with the laws in force in these countries.

We always compete based on the merits of our services and our ability to provide them with a focus on innovation.

In this way, we relate to our competitors in a respectful manner and with an ethical stance. We strive to maintain a healthy relationship, always supported by honesty and seriousness.

Free and fair competition

Free and fair competition

At **ilia**, we value free and fair competition, adopting ethics, transparency, and cordiality as our guiding principles.

By putting these principles into practice, we aim to ensure a fairer and more transparent market, preventing unfair commercial practices that negatively impact the economy and society.

Therefore, we do not tolerate the collection and use of confidential information from our competitors.

We do not agree with the creation of any kind of agreement that aims to restrict free competition or divide the market and customers.

Conflict of Interest

When making decisions on behalf of **ilia**, we consider only the company's interests. A conflict of interest arises when a team member is in a situation where the solution might benefit themselves or someone they know.

No one on our team may directly or indirectly give, offer, or accept gifts, favors, donations, invitations, or trips in the course of their activities with the intent to facilitate any type of business.

This does not apply to institutional or promotional gifts or invitations with a commercial purpose, such as pens, agendas, etc., with minimal or moderate value.

Our commitment to the environment

Our commitment to the environment

ília is committed to acting responsibly towards the environment by incorporating practices that reduce our impact on nature.

We always adopt a preventive approach to environmental challenges, constantly seeking the development of practices and technologies that do not harm nature. It is the responsibility of everyone to be familiar with and strictly adhere to our environmental protection policies, procedures, and practices.

We handle all information related to environmental impacts transparently, ensuring it reaches our team, communities, and the environment effectively.

Disrespect, Harassment, and Discrimination

We do not tolerate any form of moral or sexual harassment, discrimination, or any act that disrespects others.

Disrespectful behavior causes destabilization in the workplace and contradicts all of our company values.

We believe that a workplace free of prejudice, threats, humiliation, and harassment fosters trust and transparency and contributes to an ethical, healthy, fair and respectful environment where everyone feels welcome.

Diversity, Equity, and Inclusion.

To innovate, it's necessary to embrace the new and the different.

We believe that together, we are more. Stronger, more innovative, more empathetic, kinder, more responsible. Simply more.

And above all, we believe that we can change the world for the better. To achieve this, we are constantly revisiting our Diversity, Equity, and Inclusion strategies, and for this, we rely on the collaboration of the entire team.

Intellectual Property

The Intellectual Property Law seeks to encourage and protect inventions and innovations, making it a topic of great importance to **ilia**. Protecting our ideas and those of our clients is the duty and obligation of all.

Intellectual property encompasses all rights granted by the Intellectual Property Law. This includes copyrights, patents, trademarks, trade secrets, design rights, logos and product designs, advertising materials, software, algorithms, and more.

All technological information, trade secrets, codes, and program ownership belong exclusively to **ilia** and must not be passed on to third parties. Source codes should never be sent to team members' private emails nor saved on personal mobile media.

Confidentiality

We have the duty and obligation to preserve and not disclose to third parties any information we receive or have access to through our work.

We consider as confidential information all data that is not public, such as client data, reports, contracts, spreadsheets, financial information, business strategies, planning data, source codes, as well as personal data, among other confidential information.

The breach of professional confidentiality may represent a crime under the Penal Code, and the responsible party will also be civilly liable for disclosing such information.

Information Security

We act proactively to protect **ilia**'s digital or intellectual information, but each of us is individually responsible for taking care of our company's systems and the information stored in them.

We adopt security measures to protect our networks, IT systems, and electronic information. It is essential that everyone knows, understands, and complies with our information security policies and guidelines regarding the use of our systems.

Personal information and data protection

By recognizing the importance of ensuring the rights to privacy and personal data protection of our customers, we ensure that necessary measures are in place to ensure that the processing of personal data is legitimate, controlled, and informed.

Access to personal information is limited to team members who need to know them to perform their activities. We are committed to protecting and safeguarding all personal information entrusted to us.

Our goal is to comply with personal data protection laws and to adopt necessary measures to ensure the confidentiality, integrity, and availability of information.

Corruption Prevention

We do not tolerate any form, or attempt, of corruption or illegal act that violates current legislation.

Everyone on our team is directly responsible for monitoring and ensuring compliance with anti-corruption rules.

Detecting fraud requires professionals with ethical sense, so knowing and understanding **ília's** ethical values is essential for precautions to be taken.

Therefore, in cases of suspected illegal acts, it is everyone's duty to report the incident through the communication channels provided by **ília**.

Compliance practices.

We take your obligation to prevent corruption seriously and expect our suppliers and partners to support this commitment in the same way.

We adhere to and comply with all Brazilian or foreign laws and regulations applicable to **ília**, as well as those specific to its activity, including Law No. 12.846/13 and its regulatory decree No. 8.420/15 and the FCPA - Foreign Corrupt Practices Act.

Compliance with laws is everyone's duty, and conducting business in a highly ethical manner and in compliance with the law is **ília**'s purpose.

Communication Channels

We have a completely confidential, secure, and independent Whistleblowing Channel as a means of communication for reporting suspicions or actual violations of our code, our values, norms, and all applicable legislation.

If you have witnessed or become aware of any situation that may harm **ília** or that appears contrary to our values and to this Code, please contact us through our Whistleblowing Channel.

Make your report by clicking [here](#).

Thank You!

