

## CODE OF ETHICS AND CONDUCT

### FCJ VENTURE BUILDER PARTICIPAÇÕES S.A.

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#### 1. GENERAL GUIDELINES

- 1.1. FCJ establishes this Code of Ethics and Conduct (“Code”), which aims to establish and govern the principles, norms and standards of ethics and conduct to be observed in all relationships maintained by partners, directors, administrators, executives, employees, agents, interns, investors and service providers of FCJ (“Collaborators”), guiding the decisions, attitudes and actions expected of Collaborators and thus explaining the appropriate posture for the different situations, relationships and audiences that exist or may exist, thus serving as a practical guide to the personal and professional conduct of all Collaborators.
- 1.2. For the purposes of this Code:
  - 1.2.1. FCJ’s partners and directors (“Administration”) are part of its management;
  - 1.2.2. not only direct customers are considered investors, but also FCJ shareholders/unit holders (“Investors”);
  - 1.2.3. Invested Entities are any companies, entities or investment funds in which FCJ invests or will invest (“Invested Entities”)
- 1.1. Each situation covered by this Code must be analyzed individually and the respective context in which it is applied must be considered.

#### 2. SCOPE AND ADHESION

- 2.1. This Code applies to all Employees, as well as to any persons related to the administration and management of the electronic investment platform.
- 2.2. In FCJ’s relations with its Investor clients, Invested Entities, partners, suppliers, government agencies and other public entities and other related parties (“Third Parties”), Employees must:
  - (i) make their best efforts to ensure that these Third Parties are aware of the content of the rules of this Code; and
  - (ii) act in accordance with the guidelines of this Code.
- 2.3. Prior to starting their activities, each Employee: (i) will receive a copy of this Code; and (ii) will sign a term declaring that they have full knowledge and understanding of this Code, assuming the duties and responsibilities set forth herein (“Term of Adhesion”).
- 2.4. It is the responsibility of the administrative area and/or the human resources department of FCJ to present this Code to employees, at the time of hiring, with the collection of their signatures on the Term of Adhesion.
  - 2.4.1. This Code binds the Employee from the moment the Agreement is signed and will remain in full force and effect in relation to such Employee while performing activities

with FCJ, also observing the provisions of the following item.

- 2.5. Without prejudice to the provisions of the item above, the provisions relating to secrecy and confidentiality will continue in full force and effect with respect to Collaborators until the Confidential Information eventually becomes public knowledge.
- 2.6. 2.6. It is the responsibility of the Compliance area/department to carry out the duties of this Code and monitor its observance.
- 2.7. 2.7. Notwithstanding the provisions of this Code, the Internal Policies set out in this Code also apply to Employees, subject to their relationship with the activities carried out
- 2.8. This Code and Internal Policies will be available on the FCJ website and in a specific directory on the internal network.

### **3. PHILOSOPHY, ETHICAL PRINCIPLES AND VALUES**

- 3.1. FCJ and its Employees must maintain high ethical standards of conduct in all activities carried out, as well as in relationships between Employees or with Third Parties, regardless of the environment in which such activities are carried out, refraining from any illegal and/or immoral act or omission.
  - 3.1.1. For the purposes of this Code, any act or omission that contravenes Brazilian legislation, as well as the regulations and self-regulation applicable to FCJ's activities, including, without limitation and as applicable, the rules issued by the Securities and Exchange Commission ("CVM"), is considered illegal or unlawful.
- 3.2. Transparency and integrity are the fundamental and guiding elements of the relationships established by FCJ.
  - 3.2.1. Furthermore, one of the principles that guide and guide FCJ's activities is the management of its business with socio-environmental responsibility combined with competitiveness and the optimization of the relationship of trust and transparency that exists between FCJ and its stakeholders in the pursuit of maximizing the economic results they seek.
- 3.3. The conduct of FCJ and its Employees must always comply with applicable laws and regulations in Brazil, including, but not limited to, tax, labor, economic power, consumer, financial and capital markets legislation, as well as legislation related to combating corruption and money laundering ("Legislation"). Regulatory standards applicable to FCJ must also be observed.
- 3.4. In addition to the ethical standards expected of any honest and upright person, with the purpose of avoiding moral deviations and possible undue favoritism towards FCJ and/or Third Parties, all decisions and actions of FCJ and its Employees will always be taken and guided by the following values and principles:
  - a) Strict compliance with applicable laws and regulations;
  - b) Technical knowledge and preparation of Employees for the adequate

provision of FCJ services; b1) FCJ hires Employees with the qualifications corresponding to their respective activities, as well as adopts measures to keep them duly updated in relation to Legislation, Self-Regulation and market practices, in accordance with the attributions of each one;

- c) Investor and Market Confidence;
- d) Integrity, Dedication and Discipline of Employees;
- e) Investor Readiness;
- f) Efficiency and agility of employees;
- g) Prudence of Employees;
- h) Transparency in internal relations, with Investors and Third Parties;
- i) Appropriate treatment in possible situations of conflicts of interest;
- j) Leadership posture.

#### **4. FCJ STRUCTURE AND PERFORMANCE**

##### **4.1. Corporate Governance**

- 4.1.1. High standards of corporate governance guide FCJ's organizational structure, regulating and influencing relationships between its partners, administrators, employees, supervisory and control bodies and other interested parties.

##### **4.2. Recruitment of Employees**

- 4.2.1. It is forbidden to hire a politically exposed person as a Collaborator.
- 4.2.2. The hiring of a public agent or former public agent must comply with the Anti-Corruption Policy.

##### **4.3. FCJ Investment and Responsibility Strategies**

- 4.3.1. FCJ's investment strategies must be followed consistently when making investment and divestment decisions.

##### **4.4. Disclosure of Information and Relevant Facts**

- 4.4.1. FCJ complies with the rules for the disclosure of information provided for in Legislation and/or Self-Regulation, notably the disclosure of Relevant Facts, as defined in the Legislation.

##### **4.5. Segregation of Activities and Use of Facilities, Files and Equipment.**

#### **5. CONDUCT OF EMPLOYEES**

- 5.1. Without prejudice to the other items of this Code and any applicable Annexes and instruments, in accordance with their respective attributions, each Employee must observe the conduct described below.

##### **5.2. General Rules of Conduct**

- 5.2.1. Without prejudice to other rules of conduct set forth herein, every Employee, within the scope of their activities, must:
  - (i) develop its activities with commitment to results, based on solid operational plans, building and maintaining FCJ's reputation, seeking continuous learning in matters related to FCJ's activities;
  - (ii) to look after the interests of its Investors and the preservation of assets and values entrusted to them by them;
  - (iii) to employ the care and diligence which every active and upright man is accustomed to employ in the management of his own affairs; and
  - (iv) create value through a long-term perspective, supporting the directors of Invested Entities in achieving their long-term goals and strategies.
- 5.3. Knowledge and Compliance with Legislation and Internal Policies
  - 5.3.1. Every Employee must have and maintain the appropriate qualifications to perform their respective activities.
  - 5.3.2. In addition to mastering the technical knowledge inherent to their functions, every Employee, within the scope of their duties, must have and maintain full knowledge of the Legislation, Self-Regulation and the provisions of this Code and other internal policies of FCJ ("Internal Policies").
  - 5.3.3. FCJ adopts measures to keep its Employees, in accordance with their responsibilities, duly updated regarding Legislation, Self-Regulation and market practices.
- 5.4. FCJ Heritage
  - 5.4.1. FCJ's assets consist of tangible assets, such as its facilities, equipment, furniture and other physical assets, as well as intangible assets, such as trade secrets, trademarks, copyrights and/or intellectual property rights, marketing material, databases and other electronic files. These must be safeguarded by Employees, who must use them in the best possible way to fulfill their duties.
- 5.5. Intellectual Property
  - 5.5.1. The result of intellectual work and strategic information generated at FCJ will be the exclusive property of FCJ.
  - 5.5.2. The Employee is responsible for treating as Confidential Information, as defined in the Data Protection and Information Security Policy, information about intellectual property to which he/she has access as a result of his/her work, using it carefully and in accordance with the General Data Protection Law.
- 5.6. Use of social media on FCJ premises and/or its systems
  - 5.6.1. Social media can be defined as technologies that allow users to communicate, enabling the exchange of information and content. Examples of social media are:

*Linkedin, Facebook, Instagram, X, Microsoft Lync, platforms such as YouTube, blogs, vlogs, among others.*

- 5.6.2. FCJ, at its discretion, may allow its Employees to use social media in its environment and systems, both for professional purposes (if related to the Employee's duties) and personal purposes, as long as they do not violate the provisions of this Code or any other internal FCJ guideline.

## 5.7. Conflicts of Interest

- 5.7.1. Conflicts of interest are inevitable and occur when there is a conflict, even if potential, between the private interest of the agent (a Collaborator, for example) and the interest of the person or entity represented by the agent (FCJ or an Investor, for example), in such a way as to interfere with the agent's judgment and compromise the performance of his/her duties ("Conflict of Interest").
- 5.7.2. It is important to emphasize that the configuration of the Conflict of Interests is independent of the existence of harm to the interests of the person or entity represented and is independent of the receipt of any advantage or gain by the agent. The mere possibility of conflict must be dealt with under the terms of this instrument.
- 5.7.3. The success of FCJ depends on prioritizing the interests of Investors and any Conflict of Interest must be fully resolved based on the highest ethical standards.
- 5.7.4. In this sense, all Employees must identify, monitor, mitigate and disclose any Conflicts of Interest resulting from their activity and, furthermore: (i) are prohibited from accepting any gratuity or gift and carrying out activities that generate undue advantages; (ii) must base their activities on the interests, values and principles of FCJ; (iii) must adopt transparent conduct in the face of human errors that occur in the performance of their activities; and (iv) must not carry out parallel and external activities that interfere with their professional performance.
- 5.7.5. Conflicts of Interest must be identified and immediately submitted for analysis by the *Compliance* Department.
- 5.7.6. Any Employee's intention to provide any paid service to third parties outside the scope of FCJ, even outside FCJ working hours, must be previously submitted for approval by the *Compliance* Department.

## 5.8. Use of the FCJ Brand

- 5.8.1. The name, brands, logos and any other signs that identify FCJ must only be used in the exercise of the Employee's professional duties with FCJ, including the eventual use and delivery of FCJ business cards or identification badges.

## 5.9. Work Environment and Mutual Respect

- 5.9.1. Employees must constantly seek to improve the quality of the work environment,

aiming at the safety, hygiene, health and well-being of other Employees. They are responsible for maintaining and taking care of these conditions.

5.9.2. All employees must treat their professional colleagues with respect for their individuality, religious beliefs and personality. FCJ condemns any practice of moral or sexual harassment, discrimination of any kind or humiliation.

5.9.3. Despite being competitive in its sector, FCJ is internally a cooperative company, always seeking the professional growth of its employees and encouraging the exchange of information and experiences, respecting the segregation of activities and functions.

#### 5.10. Harassment and Abuse of Power

5.10.1. Harassment is characterized when someone in a privileged position uses this advantage to humiliate, disrespect, embarrass or force someone to perform an act that the person being harassed is not obliged to do. Moral harassment occurs when someone is exposed to humiliating situations during the workday. Sexual harassment aims to obtain sexual advantage or favor.

5.10.2. Regardless of hierarchical level, no Employee may be subject to physical sanctions or any type of harassment, whether sexual, economic, moral or of any other nature, nor to situations that constitute disrespect, intimidation or threat.

#### 5.11. Diversity

5.11.1. FCJ and its Employees undertake to base their conduct on the principles of ethics, non-discrimination, equality and respect for human freedoms and self-determination, respecting and promoting diversity, abstaining from all forms of prejudice and discrimination, so that no person, whether in the internal or external environment of FCJ, receives discriminatory treatment based on their race, skin color, ethnic origin, nationality, social position, age, religion, gender, sexual orientation, personal appearance, physical, mental or psychological condition, marital status, opinion, political conviction, or any other differentiating factor.

5.11.2. Discriminatory practices are considered to be all actions or omissions carried out due to the factors mentioned above that violate the principle of equality. Furthermore, in order to prevent discriminatory conduct and disseminate respect for all forms of manifestation of human diversity, FCJ undertakes to provide training, at least annually, aimed at its employees, with the aim of respecting diversity, equality and repudiating discriminatory conduct.

#### 5.12. Gender Equity in the Workplace

5.12.1. FCJ believes in the appreciation of women and their effective participation in the job market.

5.12.2. FCJ and its Employees are committed to empowering women in order to promote

gender equality in all social and economic activities, believing that gender equality in the workplace is a guarantee for the effective strengthening of economies, boosting business, improving the quality of life of women, men and children, as well as for sustainable development.

#### 5.13. Use of Alcohol, Drugs, Tobacco and Carrying of Weapons

- 5.13.1. Drinking alcoholic beverages during working hours is not permitted, except during celebrations and in accordance with socially accepted customs. It is forbidden to perform professional duties while intoxicated. The use and possession of drugs, legal or otherwise, and remaining in the workplace in an altered state due to the use of these substances are also not permitted, as this may affect the safety and performance of both the Employee and his/her coworkers.
- 5.13.2. The consumption of cigarettes, cigarillos, cigars, pipes or any other smoking product, whether or not derived from tobacco, is not permitted, in accordance with Law No. 13,541, of 05/07/2009, in the workplace, nor in the building where FCJ is located. If necessary, the Employee must leave the building to use the product in a place suitable for this purpose.

#### 5.14. Marketing of Goods

- 5.14.1. The sale and exchange of goods on FCJ premises is prohibited.

#### 5.15. Political and Religious Participation

- 5.15.1. The Collaborator is prohibited from making, on behalf of FCJ, any contribution in value, goods or services to political and/or religious campaigns or causes. Therefore, FCJ resources, space and images cannot be used to meet personal, partisan and/or religious political interests.
- 5.15.2. FCJ respects the individual right of the Employee to engage in civic affairs and participate in the political and/or religious process. However, such participation must occur outside the work environment and, in such situations, the Employee must make it clear that the statements are personal and do not represent the position of FCJ.

#### 5.16. 5.16. Participation in Union Activities

- 5.16.1. FCJ respects free association and recognizes trade unions as legal representatives of Employees and seeks constant dialogue.

#### 5.17. Telework (*Home Office*)

- 5.17.1. FCJ may authorize certain Employees to work outside its facilities, using a Telework system (*Home Office*). In this case, the Employee must continue to observe the conduct provided for in this Code of Ethics and Conduct.

#### 5.18. Conduct Outside FCJ Premises

- 5.18.1. Whether in an internal or external environment, such as participation in training, events or other situations that allow the identification of FCJ, the Employee's conduct must be compatible with FCJ's values, thus contributing to the recognition of FCJ's good corporate image.

## 6. RELATIONSHIP WITH THIRD PARTIES

- 6.1. Without prejudice to the other Sections of this Code, FCJ and its Employees, in accordance with their respective duties, must observe the conduct described below in their relationships with Third Parties.
- 6.2. General Rule
  - 6.2.1. In its relationship with any Third Parties, FCJ and its Employees must strictly and faithfully observe:
    - a) Applicable legislation;
    - b) the applicable Self-Regulation;
    - c) the regulations and standards issued by the Securities and Exchange Commission ("CVM");
    - d) the respective contracts between FCJ and Third Parties;
- 6.3. Investors
  - 6.3.1. Relationships established with Investors must be based on trust, quality, promptness and respect.
  - 6.3.2. All Investors must receive the specified standard of treatment, and it is forbidden to prioritize service to a specific Investor or grant privileges to obtain any type of benefit.
- 6.4. Suppliers
  - 6.4.1. Relationships established with product suppliers and service providers ("Suppliers") must be transparent and free from any favoritism. FCJ values the use of legal, clear and objective criteria in the selection and hiring of Suppliers.
  - 6.4.2. Suppliers must be aware of FCJ values and act in accordance with the standards of this Code.
  - 6.4.3. FCJ may terminate a business relationship with a supplier whenever there is harm to its interests or disregard for legal, tax, environmental, health and safety at work issues and disrespect for human rights.
  - 6.4.4. It is the responsibility of FCJ and each of its Employees to maintain the confidentiality of its Suppliers' Confidential Information.
- 6.5. Public Entities
  - 6.5.1. It is strictly forbidden to make payments, under any circumstances, or offer any



advantage to Public Entities to expedite or facilitate routine services or administrative actions.

- 6.5.2. All Employees must ensure compliance with policies, standards and strict controls to prevent and combat money laundering, the financing of terrorism and illegal acts of any nature, in strict compliance with the laws applicable to the matter and in accordance with national or international best practices, in the places where they are applicable. In this sense, all Employees must observe the Anti-Corruption Policy and the Anti-Money Laundering Policy, as well as the provisions of this Code and other Internal Policies.
  - 6.5.3. All material to be presented by FCJ for participation in public tenders and competitions must be previously approved by the *Compliance* Department.
  - 6.5.4. Contracts and agreements with Public Entities must be previously approved by the *Compliance* Department.
  - 6.5.5. In addition to the provisions of this Section and this Code, all relationships with Public Entities must also comply with the Anti-Corruption Policy.
- 6.6. Business Partners and Competitors
- 6.6.1. All market and competitor information, legitimate and necessary for the business, must be obtained through transparent and suitable practices, and its acquisition by illicit means, understood as illegal and morally unacceptable means of accessing confidential information, is not permitted.
  - 6.6.2. FCJ and its Employees are prohibited from adopting any attitude that harms the image of FCJ's competitors or business partners.
  - 6.6.3. Agreements with competitors that aim to abuse economic power, arbitrary commercial practices that violate commercial rules, or that disrespect competition and anti-corruption rules must not be promoted.
- 6.7. Media and Press
- 6.7.1. The relationship with the media and the press ("Media") must be guided by transparency, credibility and trust, always observing the values of FCJ.
  - 6.7.2. FCJ has members and collaborators who are authorized to speak on its behalf, and only these people may speak to the media about FCJ. When authorized to speak on FCJ's behalf, representatives must always express FCJ's institutional point of view.
  - 6.7.3. The construction and strengthening of FCJ's image and reputation also occurs through dialogue and behavior towards the public with which it interacts. To this end, actions, both within and outside FCJ, must always be in line with FCJ's values.

## 7. MONITORING COMPLIANCE WITH THIS CODE

- 7.1. The administration and monitoring of this Code and Internal Policies will be carried out by a person appointed by the FCJ administration ("*Compliance* Department"), who will be responsible for complying with and enforcing this Code, the Internal Policies and other rules issued by FCJ.
- 7.2. FCJ adopts a preventive and repressive stance in relation to practices that violate the Legislation, Self-Regulation, this Code, Internal Policies and other rules issued by FCJ, using its own systems to monitor operations and supervise the activities of its Employees constantly. In this sense, to ensure strict compliance with its Internal Policies, as well as applicable Legislation and Self-Regulation, FCJ reserves the right to track, monitor, record and inspect any and all voice traffic carried out through telephone contact and the Internet, as well as the exchange of written information transmitted via the Internet, intranet, instant messaging system, fax, physical and electronic mail (e-mail), as well as files stored or created by computer resources belonging to FCJ or used on its behalf.
- 7.3. The measures described in the previous item allow FCJ to monitor the conduct of its Employees and enable the correct identification of the person responsible in the event of a violation.
- 7.4. In addition, FCJ will carry out periodic tests, at least once a year, to identify possible irregularities and misconduct by its Employees.

## **8. COMMUNICATION CHANNELS AND REPORTING**

- 8.1. In case of doubts regarding the interpretation and application of the provisions of this Code, the Internal Policies or other unforeseen situations, the following channels should be used: (i) communication/consultation with your hierarchical superior or your board of directors; or (ii) communication/consultation with the *Compliance* area.
- 8.2. Complaints may be made directly to the Compliance Department, which will be responsible for evaluating the report and ensuring confidentiality regarding the identity of the complainant.

## **9. VIOLATION OF THIS CODE AND INTERNAL POLICIES**

- 9.1. Employees acknowledge and agree that compliance with this Code and Internal Policies is necessary for the proper functioning and correct use of FCJ's facilities, files and equipment, and that their violation and/or non-compliance may cause significant and difficult to repair damage to FCJ and/or third parties.
- 9.2. Employees are liable for any losses they cause to FCJ and/or third parties as a result of failure to comply with the provisions set forth in this Code and Internal Policies.
- 9.3. Violation or suspected violation of the rules of this Code and Internal Policies, by action or omission, will result in the opening of an internal process to investigate possible irregularities and may subject the Employee involved to disciplinary measures.
- 9.4. All Employees must adopt conduct that helps prevent and suppress the conduct mentioned in

the previous item. In other words, all Employees must value FCJ's business and image and be aware of risks inherent to their responsibilities, reporting them to the appropriate channels whenever such risks may represent relevant and probable impacts on FCJ in the conduct of its business.

- 9.5. Exemption from compliance with any of the rules of conduct of this Code or the Internal Policies by an Employee depends on express approval by the Management, which will deliberate on the specific case presented by the *Compliance* Department, with its opinion on the matter.
- 9.6. All those involved in receiving, investigating and deciding on complaints must guarantee the confidentiality of the information and the identity of the complainant.
- 9.7. Any Employee who deliberately fails to report the situations described in item 9.4 or omits relevant information will also be subject to disciplinary measures jointly with the offender.
- 9.8. Upon becoming aware of irregularities or violations, the *Compliance* Department must immediately inform the FCJ Administration, which will be responsible for investigating the facts that occurred. Upon investigation of the facts, the Administration will prepare a report for the application of the penalties provided for in the item below.
- 9.9. The FCJ may preventively remove the accused Collaborator if there is a possibility that he/she could hinder or influence the proper investigation of the complaint.
- 9.10. Without prejudice to any applicable administrative, civil and criminal sanctions, the offending Employee will be subject to the following penalties:
  - (i) For Employees:
    - a. warning; and/or
    - b. suspension; and/or
    - c. dismissal/termination of contract.
  - (ii) For Third Parties:
    - a. application of contractually provided penalty; and/or
    - b. contract termination/divestment.
- 9.11. Penalties must always be proportionate to the actions committed, and any arbitrary or excessive application is prohibited.
- 9.12. Among other factors, the following must be considered as decisive factors for the application of the penalty:
  - (i) level of responsibility of the Employee;
  - (ii) habitual conduct of the Employee;
  - (iii) origin of the complaint;
  - (iv) the facts investigated;
  - (v) hypotheses of recurrence;
  - (vi) severity of the violation; and
  - (vii) extent of the damage caused or the potential for damage, including to the image

of FCJ.

- 9.13. No Employee will be exempt from disciplinary sanctions due to their position at FCJ.
- 9.14. Whenever applicable, the *Compliance* Department will provide for the communication of violations to regulatory bodies and competent authorities and will cooperate with any investigations and proceedings.

## 10. **CLARIFICATIONS**

- 10.1. The terms and conditions contained in this Code are sufficient to apply to the widest range of situations and minimize the subjectivity of your personal interpretations of moral and ethical principles related to FCJ's activities. Should any point here require clarification, the FCJ Board of Directors should be consulted.

## 11. **GENERAL PROVISIONS**

- 11.1. The rules contained in this Code of Ethics and Conduct may be periodically revised and will be communicated openly by FCJ through all communication channels with its Employees, and will be in force from the date of admission of each member to FCJ. No member of FCJ may claim ignorance of the guidelines contained in this Code under any circumstances or under any argument.