ZOOMHOLDING

EMPLOYMENT RELATIONS POLICY

INTRODUCTION:

The EMPLOYMENT RELATIONS POLICY, together with the CODE OF CONDUCT and the other ZoomHolding Policies, are part of its Integrity Program.

Specifically, the EMPLOYMENT RELATIONS POLICY includes the guidelines and standards that guide and regulate the daily routines of Employees who have an employment relationship, regardless of the position or role they occupy.

The companies belonging to the ZoomHolding Group expect their Employees to embody the values that drive their Integrity Program and to be promoters of a culture that influences all their actions and decisions.

This Policy is part of the Integrity Program, complementing, rather than replacing, the Code of Conduct. That is, both documents govern the Employment Relations of the companies within the ZoomHolding Group without one excluding the other.

Therefore, as compliance is mandatory, any Employee who violates the EMPLOYMENT RELATIONS POLICY and/or the CODE OF CONDUCT will be subject to disciplinary actions and, depending on the case, the termination of their Employment Contract.

I – RULES:

1. MANDATORY COMPLIANCE AND SCOPE:

1.1 The rules outlined in this Policy regulate the Employment Relations established between individuals and the companies belonging to the ZoomHolding Group, based on the CLT – Consolidation of Labor Laws. Therefore, for the purposes of this Policy, such individuals shall hereafter be referred to simply as EMPLOYEES or STAFF.

1.2 The rules in this Policy complement the Code of Conduct of the companies within the ZoomHolding Group and the individual employment contract signed with the Employee performing duties at the headquarters, branches, remotely, or at the locations of clients contracting with companies of the ZoomHolding Group, regardless of position or role.

1.3 The obligation to comply with this Policy, the Code of Conduct, and any other Policies remains in force throughout the duration of the Employment Contract and, depending on the obligation (such as confidentiality), may continue even after the end of the Employment Contract.

2. TECHNOLOGICAL RESOURCES, IMAGES, VIDEOS AND SOCIAL MEDIA:

2.1 For the purposes of this Policy, Information Technology resources include computers (PCs or notebooks), portable devices (smartphones, tablets, storage drives), network servers, internet

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and intranet access, email, chat, Skype, apps and platforms for meetings and virtual conferences, or any other communication technology tools, whether or not mentioned herein, made available by ZoomHolding Group companies, regardless of whether the company owns, leases, or has rights to use such resources under any agreement.

2.2 All information created, stored, transmitted, or carried on the Information Technology resources provided in the corporate environment belongs to the ZoomHolding Group companies.

2.3 Employees are required to comply with all terms of the Information Security Policy and must use the assets, data, information, and IT resources responsibly and in accordance with the law (such as the General Data Protection Law and its regulations).

2.4 Users of Technological Resources must adopt best practices in IT governance, especially but not limited to:

a) Keeping software and antivirus programs up to date;

b) Observing the principles outlined in the General Data Protection Law when handling personal data in the corporate environment;

c) Employees are prohibited from using public network connections to access data or servers belonging to ZoomHolding Group companies;

d) They are responsible for maintaining the confidentiality of logins, passwords, ID badges, and any personal-use codes, which must be kept secure and private. Under no circumstances may these be transferred, and in case of any suspicion of breach, the password or code must be changed immediately;

e) Employees may not use or install pirated or unauthorized software on IT resources provided by ZoomHolding Group companies under any pretext or justification;

f) All Standard Operating Procedures used in the corporate environment and all recommendations issued by the technical support team must be followed;

g) It is forbidden to transmit any written, video, image, or audio message containing content that is inappropriate or unrelated to the work environment. Employees are also required to report any such messages that come to their attention to their immediate supervisor.

2.5 Employees acknowledge that ZoomHolding Group companies have monitoring procedures in place for all equipment, IT resources, systems, and network activities, regardless of their physical location. Even if certain resources are assigned for individual use or specific functions, Employees are aware that monitoring will occur.

2.6 Under the monitoring procedures mentioned above, ZoomHolding Group companies may revoke an Employee's access to IT resources at any time, with or without prior notice.

2.7 Employees of ZoomHolding Group companies may not presume any right to personal privacy or confidentiality for personal data transmitted through technological resources provided by the company, even if accessed outside working hours.

2.8 The capture of images and videos using cell phones, cameras, or any other recording devices is prohibited on the premises of ZoomHolding Group companies, their clients, contractors, or third parties, except for those images previously authorized by Senior Management for use by the Communication and Marketing department or in the fulfillment of an Employee's job duties or contract obligations.

2.9 The use of social media for personal purposes is prohibited during working hours. Outside of these hours, Employees must continue to respect the values of this Policy and the Code of Conduct, especially when referencing the name of ZoomHolding Group companies or any of

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their Employees or third-party associates.
2.10 All business dealings with clients, suppliers, service providers, business partners, or any third parties must be conducted in writing, including via electronic means provided by ZoomHolding Group companies. Phone or video/voice communications may be used to clarify non-critical points. If such discussions result in changes to a proposal or necessary conditions, the Employee must document the meeting in minutes and obtain confirmation from the involved party, which may be done via email.
2.11 Failure to comply with any rule outlined in this section may constitute a serious violation by the Employee and may result in termination of the Employment Contract.

3. PROTECTION OF COMPANY PROPERTY, ASSETS, AND OTHER RESOURCES:
3.1 Employees must make sustainable, rational, and reasonable use of the property, assets, and resources made available by ZoomHolding Group companies, including but not limited to internal facilities, furniture, materials, vehicles, equipment, computers, software, trademarks, and trade names. These resources must be used solely to promote and develop the corporation's activities and for the purpose for which they were intended or provided. Personal use of these resources by the Employee, their family, relatives, friends, or third parties is not permitted.
3.2 The Employee shall be liable for replacement costs and any other damages caused by improper, abusive, inappropriate, or illegal use of any asset or resource provided by ZoomHolding Group companies, even if not owned by the Employee.
3.3 When authorized to use vehicles owned by ZoomHolding Group companies, the Employee is personally responsible for their proper use and for strict compliance with all legal regulations, especially the Brazilian Traffic Code. The Employee is also responsible for any damages caused to the companies or third parties as a result of legal violations or misuse. The Employee shall also pay any traffic fines and accept the associated penalty points on their driver's license.
3.4 Periodic maintenance of corporate vehicles will be provided by the designated department of ZoomHolding Group companies. However, Employees using such vehicles are responsible for requesting corrective maintenance if any defect or malfunction is detected.

4. EMPLOYEE RELATIONSHIP WITH CLIENTS:

4.1 According to ZoomHolding's Code of Conduct, Clients are legal entities, both public and private, that interact with ZoomHolding Group companies, either by showing interest in their goods and services or by simply seeking information, regardless of whether a contract is established.
4.2 ZoomHolding Group companies understand that client relationships and satisfaction, based on ethical, legal, and socially responsible principles, form the foundation for the growth and expansion of their operations.
4.3 The Employee must serve each client, regardless of their financial capacity, clearly, objectively, and with commitment to meeting deadlines, technical conditions, and the quality standards defined in certifications and the proposed offer.
4.4 The Employee must assist the client until all questions are fully answered and until the

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contracted scope is completely fulfilled and the client is entirely satisfied, within the limits of the signed agreement. Communications and actions in this process must be clear, truthful, cordial, empathetic, and precise.

4.5 The Employee is bound by a duty of confidentiality regarding all client matters, proposals, contracts, and exchanged messages involving ZoomHolding Group client information, regardless of whether a specific agreement has been signed. This obligation remains after the employment contract ends, under penalty of liability for any damage caused to ZoomHolding Group companies or their clients.

4.6 Employees are prohibited from withholding relevant information about any technical data related to products or services offered by ZoomHolding Group companies or from making any communication that could mislead the client.

4.7 Employees may not propose conditions or make offers to clients that have not been officially assured by manufacturers or suppliers.

4.8 For the purposes of this Policy, the term Client is broad and applies regardless of whether a contract was signed. Therefore, all the rules in this section must be observed equally, whether or not the client has contracted with the ZoomHolding Group companies.

5. EMPLOYEE RELATIONSHIP WITH MANUFACTURERS, SUPPLIERS, SERVICE PROVIDERS, BUSINESS PARTNERS, AND THIRD PARTIES:

5.1 Employees are prohibited from using their position or role, as well as any materials, supplies, resources, or equipment from ZoomHolding Group companies, to benefit themselves or to benefit manufacturers, suppliers, service providers, business partners, or third parties that contract with ZoomHolding Group companies.

5.2 This prohibition extends to the Employee's relatives, friends, or any associated person seeking to obtain any type of advantage, directly or indirectly.

5.3 The Employee is obligated to report to their Immediate Supervisor or any Company Director any attempt by a manufacturer, supplier, service provider, business partner, or third party to gain benefits, access confidential information, or offer advantages or benefits intended to influence decisions, secure or retain business, obtain confidential information as defined in the Code of Conduct, or gain any other advantage or benefit.

5.4 The Employee is also obligated to report any unethical or illegal practices, or the use of unethical or illegal methods, by suppliers, service providers, business partners, or any third party contracting with ZoomHolding Group companies, that come to their attention, even if those actions are not directed toward ZoomHolding Group companies, their Employees, or clients.

6. PROFESSIONAL CONDUCT AND RESPONSIBILITY:

6.1 The Employee must perform their duties in accordance with the responsibilities of their position as defined in their Individual Employment Contract, while also respecting Standard Operating Procedures, Technical Specifications, Internal Regulations, and Quality Standards in effect before or during the employment relationship.

6.2 Employees are allowed to participate in events organized by third parties, such as lunches, dinners, and receptions, provided that the following conditions are jointly met:

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a) The event must be strictly technical or commercial in nature and not exclusively directed at ZoomHolding Group Employees;
b) The event must not have any partisan, ideological, political, associative, discriminatory, anarchist, or revolutionary content, and under no circumstances should it compromise any ethical or integrity principles set forth in the Code of Conduct or other Company Policies;
c) The event must not be a means of concealing or disguising attempts to create a Conflict of Interest with Employees that may influence or compromise compliance with ethical or legal obligations;
d) The Employee must attend the entire event accompanied by another Employee, and both must observe rules concerning the acceptance or offering of gifts, presents, and hospitality, as well as any other actions that could constitute an attempt to influence negotiations or obtain benefits, even if not specifically outlined in the Code of Conduct or Policies of ZoomHolding Group companies;
e) Employees must not consume alcohol at formal events where technical or professional representation is required in front of third parties, and must refrain from any behavior that may damage the reputation or ethical standards of the Company or its Integrity Program.
6.3 It is considered a very serious violation to make statements that may defame or discredit manufacturers, suppliers, or service providers that interact with ZoomHolding Group companies or their competitors.

7. PARTICIPATION IN PROFESSIONAL ASSOCIATIONS, POLITICAL PARTIES, AND VOLUNTEER WORK:

7.1 ZoomHolding Group companies value and support their Employees' rights to representation before legally established Unions and Professional Associations, recognizing this as a legitimate and democratic practice.
7.2 ZoomHolding Group companies acknowledge that political participation is a citizen's right and can be a way to assume responsibilities that contribute to the country's development. Therefore, the companies neither intervene in nor negatively influence their Employees' participation in political parties.
7.3 In situations where the Employee wishes to run for political office, they must notify the company in advance, requesting immediate leave from their duties and subsequent termination of their employment.
7.4 Any conduct, action, communication, or act that implies support for candidates or political parties, coercion, partisan discussions, discrimination, threats, or any type of discomfort to colleagues—whether within or outside the corporate environment—are unacceptable and will be considered very serious violations.
7.5 ZoomHolding Group companies are ethically and legally committed to social responsibility. Therefore, they support the promotion of citizenship, volunteer work, and involvement with social and community issues. Employees who actively participate in such causes may, under certain circumstances, engage in volunteer actions during working hours, provided they notify and obtain prior approval from their immediate Supervisor and do not compromise their work activities.

8. PROFESSIONAL DEVELOPMENT:

8.1 Employees must participate in all training sessions and evaluations promoted by ZoomHolding Group companies throughout the duration of their Employment Contract, particularly—but not exclusively—those aimed at professional development, optimal human resource utilization, and role reallocation to support company activities.
8.2 We believe in continuous development and training of Employees through a process of mutual cooperation. We encourage Employees to maintain lifelong learning and to share their knowledge with their teams as a path toward collective growth.
8.3 Employees are expected to attend, diligently, all courses, training sessions, seminars, and professional development events offered or funded by ZoomHolding Group companies, including those aimed at role improvement or reallocation, occupational safety, updates, and enhancement of the Integrity Program.

9. MISCELLANEOUS:
9.1 ZoomHolding reserves the right to amend the Employment Relations Policy without requiring Employee approval. The new version will be made fully available through internal communication channels (electronically or in physical format) and will also be published on the homepage of ZoomHolding Group companies.

EMPLOYMENT RELATIONS POLICY
Zoom Holding S.A.
DRAFTED BY
Legal Advisory Team
CONCEIVED AND REVIEWED BY
Senior Management and Compliance Team
Version 4.0 May/2025
In the event of changes, a new version will be compiled in its entirety.

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