ZOOMHOLDING

PUBLIC ADMINISTRATION RELATIONSHIP POLICY

INTRODUCTION:

The PUBLIC ADMINISTRATION RELATIONSHIP POLICY, together with the CODE OF CONDUCT and other ZoomHolding Policies, is part of its Integrity Program.

Specifically, the PUBLIC ADMINISTRATION RELATIONSHIP POLICY outlines the guidelines and rules that guide and regulate the relationships of Senior Management, Representatives, Agents, Employees, Suppliers, Service Providers, and Business Partners of ZoomHolding Group companies in their interactions with Public Administration.

ZoomHolding Group companies interact with public agencies and officials in several ways: as taxpayers, as bidders and contractors for the supply of goods and services of public interest, as users of services provided by public entities, and also as entities subject to the regulatory power of Public Administration, especially in the process of obtaining licenses and permits.

This Policy is based on the ethical principles and values of ZoomHolding Group companies and their commitment to complying with current legislation, including, but not limited to, the Anti-Corruption Law, the General Public Procurement Law, and other laws that regulate bidding procedures and administrative contracts signed with Public Administration.

This Policy is part of the Integrity Program and complements, rather than replaces, the Code of Conduct. That is, both documents govern the relationships between ZoomHolding Group companies and those who interact with them, with neither excluding the other.

Therefore, compliance with the PUBLIC ADMINISTRATION RELATIONSHIP POLICY and/or the CODE OF CONDUCT and other Policies of ZoomHolding Group companies is mandatory. Any violation may result in disciplinary actions and, depending on the case, the termination of contracts or the dissolution of partnerships with ZoomHolding Group companies.

I – RULES:

1. MANDATORY COMPLIANCE AND SCOPE:

1.1 The rules set forth in this Policy govern all internal and external relationships involving ZoomHolding Group companies. All individuals who interact with the Group (Senior Management, Representatives, Agents, Employees, Suppliers, Service Providers, and Business Partners), regardless of the legal nature of their relationship, must comply with this Policy in their interactions with Public Administration.
1.2 The rules in this Policy apply to interactions with public bodies and officials at all levels of government (Federal, State, and Municipal), including their autonomous agencies, foundations, and state-owned enterprises. For the purposes of this Policy, public officials include any agent, representative, advisor, appointee, or statutory officeholder, employee, director, board member, or any person who, even temporarily and without pay, holds a public position, function, or employment, whether elected or appointed, in any Entity, Agency, Authority, or Foundation of the Executive, Legislative, or Judiciary branches, including direct or indirect Public Administration, state-owned enterprises, international public organizations, or any political party, including candidates running for public office in Brazil or abroad.

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2. REINFORCEMENT OF DUTIES AND CONFIRMATION OF ETHICAL STANDARDS ESTABLISHED IN THE CODE OF CONDUCT:

2.1 The Public Administration Relationship Policy incorporates, as if fully transcribed herein, all the legal, ethical, anti-bribery, and anti-corruption compliance rules established in ZoomHolding's Code of Conduct. These rules are mandatory for all individuals who interact with ZoomHolding Group companies, including but not limited to Senior Management, Representatives, Agents, Employees, Suppliers, Service Providers, and Business Partners.
2.2 ZoomHolding Group companies reaffirm the standards outlined in the Code of Conduct that repudiate and prohibit the individuals mentioned above from accepting, offering, or giving—directly or indirectly—bribes, favors, money, gifts, benefits, or advantages of any kind, with the intent of obtaining an advantage or influencing decisions made by public officials.
2.3 No employee or business partner will suffer any penalty or retaliation from ZoomHolding Group companies due to the loss of business, delays in obtaining licenses, or any unfavorable outcome resulting from a refusal to pay or receive a bribe or any other illicit advantage.

3. COMMUNICATIONS AND MEETINGS WITH PUBLIC OFFICIALS:

3.1 All communications with public officials should preferably be in writing to ensure transparency. When verbal communication is unavoidable and can be conducted without violating ethical or legal principles, concise, precise, formal, and technical language must be used to avoid misinterpretation or ambiguity regarding the topics discussed.
3.2 Information exchanged and/or communicated with public officials must be recorded in memos or minutes, either digital or physical, preserving not only the content but also the name and position of the public official, the institution they are affiliated with, the date, time, location, and the names of all individuals involved in the communication.
3.3 During interactions with public officials, any communication or act intended to circumvent or improperly influence public officials to act—or fail to act—against the public interest or their official duties is strictly prohibited.
3.4 When unavoidable, meetings with public officials should preferably be scheduled in advance, with a clear definition of the topics to be discussed and the expected participants.
3.5 Before any communication or meeting with public officials, it is recommended to inform them about ZoomHolding's Compliance Program and the existence of its Code of Conduct and Policies aligned with the Anti-Corruption Law and laws governing procurement processes, to demonstrate the company's commitment to compliance.
3.6 The memos and minutes specified in clause 3.2 may be replaced by email communication following a verbal interaction and/or meeting, addressed to the public officials and other participants involved, summarizing the topics discussed to avoid misunderstandings or ambiguities.
3.7 The memos and minutes described in clause 3.2 are not required when the interaction with public officials occurs in a naturally public context or is of a fundamentally bureaucratic nature, such as submitting protocols, collecting permits, obtaining certificates, or retrieving documents containing public information.

4. UNACCEPTABLE PRACTICES:

4.1 In interactions with public officials and agencies, any act or omission that violates the terms of the Code of Conduct or any ZoomHolding Policy is unacceptable. Likewise, the following behaviors are also deemed unacceptable:

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4.1.1 Committing acts intended to limit or obstruct oversight actions by Public Administration in the legitimate exercise of its supervisory duties, regardless of the context (e.g., tax, health, customs). In such cases, employees must adopt an ethical, formal, and respectful stance and take all actions that allow for proper inspection without creating obstacles.
4.1.2 Using the name of ZoomHolding Group companies to express opinions about the actions of public officials or agencies.
4.1.3 Making false statements on behalf of ZoomHolding Group companies to public officials or agencies.
4.1.4 Failing to report to Compliance Management any attempt of bribery or corruption involving public officials, employees, representatives, agents, suppliers, service providers, business partners, third parties, or members of ZoomHolding's senior management.
4.1.5 Making so-called 'facilitation payments' or promising advantages to secure or expedite favorable decisions or licenses for ZoomHolding Group companies.

5. PARTICIPATION IN PUBLIC BIDDING AND ADMINISTRATIVE CONTRACTS:

5.1 When participating in public bidding or performing administrative contracts, all relevant legal provisions must be followed, including the New Public Procurement Law (Law No. 14.133/2021), Law No. 8.666/93, Law No. 10.520/02, Law No. 13.303/16, and related regulations and decrees.
5.2 It is prohibited to collude with public officials, individuals, third parties, competing companies, or partners to engage in acts that undermine the competitive nature of the bidding process, such as price-fixing or submitting coordinated proposals.
5.3 It is forbidden to submit proposals in bidding processes with the prior knowledge that they will be unfeasible if awarded.
5.4 Engaging in fraudulent acts during the execution of administrative contracts is prohibited.
5.5 Using fraudulent schemes to obtain changes to contract specifications, extensions of delivery deadlines, increases in quantities, contract renewals, or any other advantages in contracts signed with public entities is also prohibited.
5.6 ZoomHolding Group companies repudiate all such conduct listed in this clause and require compliance by all who interact with them (Senior Management, Representatives, Agents, Employees, Suppliers, Service Providers, and Business Partners).

6. HIRING FORMER PUBLIC OFFICIALS:

6.1 Hiring individuals who have held a position or job within any public administration entity is prohibited for a period of six months from their dismissal, resignation, removal, termination, or retirement. After this period, hiring may be evaluated by Compliance Management. If approved, the individual may not participate in bidding processes involving the public body they previously served, nor may they handle matters directly or indirectly related to contracts between ZoomHolding Group companies and the respective public body.

7. MISCELLANEOUS:

7.1 In addition to disciplinary sanctions, contract termination, and partnership dissolution, violations of this Policy may result in reports to relevant public agencies, law enforcement authorities, and public prosecutors for potential criminal accountability. Civil liability may also be pursued for material and moral damages caused to ZoomHolding Group companies or third parties.

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7.2 ZoomHolding reserves the right to amend the Public Administration Relationship Policy regardless of any party's consent. The new version will be fully compiled and made available on Zoom's homepage and will take effect upon publication on the World Wide Web. It is the responsibility of each individual who interacts or contracts with ZoomHolding Group companies to monitor updates to this Policy.

PUBLIC ADMINISTRATION RELATIONSHIP POLICY
Zoom Holding S.A
PREPARED BY
Legal Advisory
CONCEIVED AND REVIEWED BY
Senior Management and Compliance
Version 4.0
May/2025
In case of amendments, a new version will be fully compiled.

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