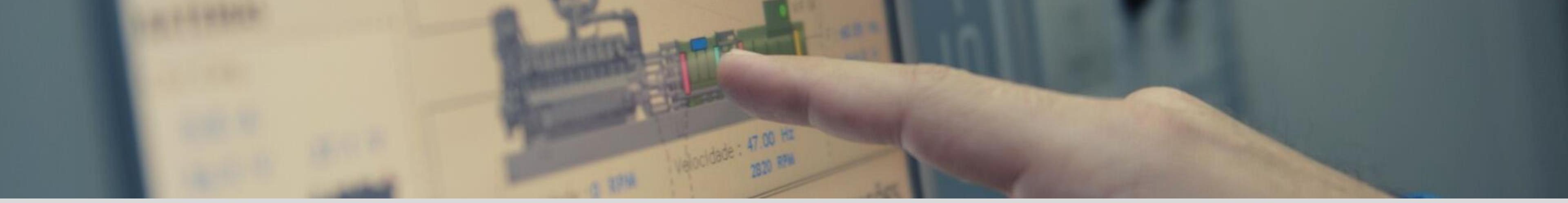




# Ascenty

*A Digital Realty and Brookfield company*

*Code of Conduct*



Ascenty is a company that values flexibility and agility when providing services to our customers, while always acting ethically toward everyone—suppliers, customers, and employees—and upholding our commitment to deliver the best telecommunications and data center service.

## **WE ARE FLEXIBLE**

We are open to change and to new ideas.

## **WE ARE ETHICAL**

We believe the means are as important as the ends.

## **WE ARE AGILE**

We don't leave for later what we can do now.

## **WE ARE COMMITMENT**

We value the quality of our solutions, our team spirit, and our social and environmental responsibility.

This Code of Conduct will help us live by these values. It acts as a compass to help us navigate between the potential choices in each situation, allowing you to make the right decisions. However, this document does not presume to offer all the answers to the various different situations that might arise. Therefore, it is important that we think carefully about our own actions and conduct, as well as those of our colleagues, and ask ourselves whether they are in line with our values and ethical standards. We need to be proactive and seek out support through the established channels to answer questions and submit suggestions, warnings, and also reports, when necessary.

Best regards,

**CHRIS TORTO**  
ASCENTY CEO



# Ethical Relationships

Being ethical means everything pertaining to people's moral behavior and our posture in social situations. Ethics guide our behavior as an organization. Doing the right thing is one of Ascenty's values.

Here are some of the values that comprise ethical behavior:

## 1. INTEGRITY

Dedicating yourself completely and wholeheartedly. Acting ethically, consistently, and professionally.

## 2. RESPECT

Being considerate of other people's motivations and understanding every point of view involved. Hearing opinions. Building consensus.

## 3. CONFIDENCE

Judging yourself capable. Understanding your potential and your limitations. Always striving to overcome your limitations. Believing in yourself and in others. Contributing to the group.

## 4. DIGNITY

Having self-respect and caring about yourself. Infusing respect with the authority resulting from knowledge and experience.

## 5. JUSTICE

Offering everyone what they are entitled to. Understanding the impact of each of our decisions. Adopting positions with wisdom, courage, and generosity.

## 6. INDEPENDENCE

Using knowledge to always offer the best solution. Being impartial. Being able to decide your own fate.

## 7. FAIRNESS

Understand part of a whole, recognize the contribution of each. Combat any kind of discrimination, including those arising from prejudice of race, creed, gender and sexual choice.

## 8. POSITIVITY

Have the ability to see lightly and creatively. Find meaning and satisfaction in what you do.

# Fair Competition

Brazil's Antitrust Act (Law 12,529 of 2011) is intended to ensure fair and balanced competition in the marketplace, establishing it as a constitutional right. Our relationship with our competitors is respectful, ethical, and based on good business practices as well as the Brazilian legislation.

Ascenty abhors any conduct that restricts competition, such as entering into agreements with competitors with regard to bids, conspiring to fix prices, share markets, or create or maintain monopolies or oligopolies.

When doing any business or acquiring any product or service on behalf of Ascenty, make sure you are not committing any economic violations. If you have any legal questions, please ask the Legal department for guidance.

Excuse yourself from any meeting, including those of class associations or corporate entities, where you would be in the presence of representatives of competitors in your market segment and where matters pertaining to competition arise. In addition, make sure that there is a record of your exit. At the earliest opportunity, notify your manager and the Compliance team about what transpired.

# ANTI-BRIBERY POLICY

Our policy is to conduct our business activities in an honest and ethical manner. We have a zero-tolerance approach towards bribery and corruption. We are committed to acting professionally, with fairness and integrity across all of our business dealings and relationships wherever we operate, consistently prioritizing the deployment and enforcement of efficient anti-bribery and anti-corruption mechanisms.

We strictly abide by all applicable anti-bribery and anti-corruption standards and controls across all jurisdictions where we operate.

All reports will be reviewed in a fair and transparent manner by the compliance team, which operates independently within Ascenty, and all due penalties will be applied in the event of conduct or ethical violations.





## HOW TO HANDLE BRIBERY / CORRUPTION

We do not do business with the government, whether at the city, state, or federal level. Ascenty does not make any political donations, in cash or otherwise, to support any political parties or candidates, since this could be perceived as an attempt to secure an improper business advantage. Ascenty's employees must not engage in any bribery activities, either directly or through third parties (such as agents or distributors). Specifically, employees must never bribe third parties or accept any kind of bribery.



## POLITICAL DONATIONS

Ascenty does not make any political donations and does not allow its suppliers to make them on behalf of Ascenty, in cash or otherwise, to support any political parties or candidates, since this could be perceived as an attempt to secure an improper business advantage.



## FACILITATION PAYMENTS AND BRIBES

Facilitation payments are a form of bribery whose purpose is to expedite or facilitate a routine public process, and not to obtain or retain business activities or any other undue business advantage. Facilitation payments are expressly prohibited.

# Gifts and Hospitality

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Employees must not offer or receive any gift or hospitality that may be deemed unlawful, inappropriate, or in violation of the recipient's policies.

No individual gift may exceed U\$50 if:

- any amount of money is involved.
- any favor or benefit is expected or suggested in return.
- such gift is a lunch, dinner, or other meal.
- such gift is a benefit (travel, training courses, etc.) paid by third parties.

Ascenty's compliance team must be informed of all gifts and hospitality received. If it is inappropriate for the employee to refuse a gift, it may be accepted and subsequently delivered to the compliance team, so that the gift may be distributed to the company as a whole or donated for charity.



## TRADE SHOWS AND EVENTS SPONSORED BY THIRD PARTIES

Invitations to trade shows or events sponsored by third parties must be approved by the line manager and informed to the Compliance team. Consideration must be made as to the topic of the trade show or event, and sufficient proof must be provided to show that the event will benefit Ascenty's activities.



## EMPLOYEE CONDUCT

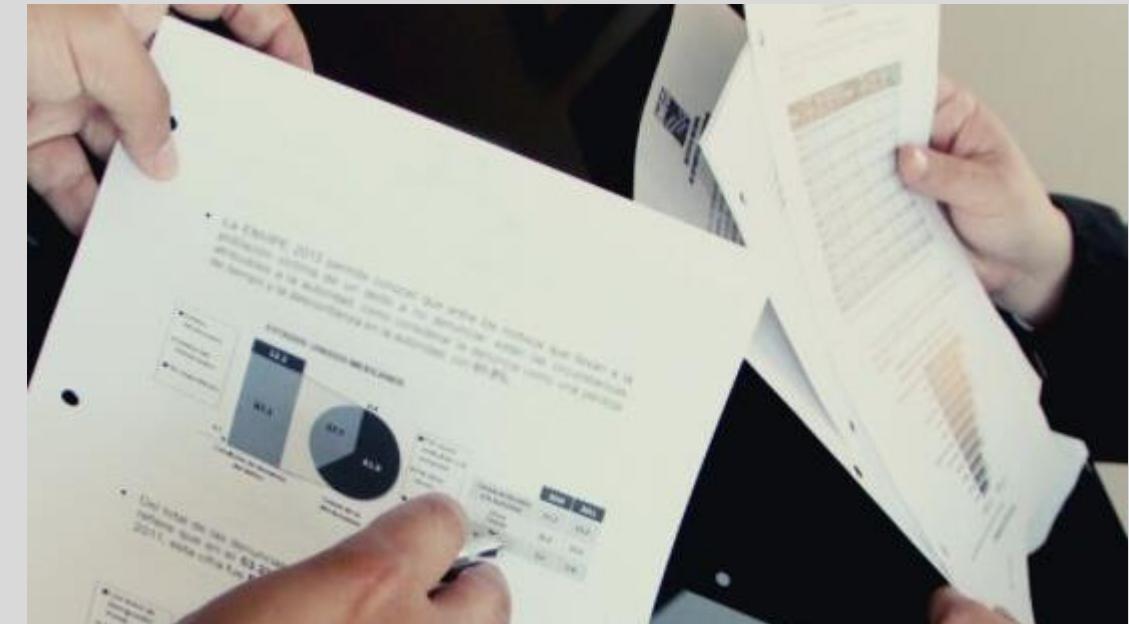
Ascenty seeks to constantly attract, retain, and develop its employees. It values diversity of experience and knowledge and encourages employees to grow personally and professionally. To this end, we act in compliance with Brazilian standards, regulations, and legislation and maintain a dignified, responsible, and fair workplace. Ascenty encourages employees to question any instruction that contradicts the company's principles and values.



## EMPLOYEE PROTECTION

Employees who refuse to accept or offer bribes, or those who raise concerns or report any violation, are often concerned about potential retaliation. Ascenty strives for transparency and supports anyone who raises genuine concerns in good faith under this policy, even if done by mistake.

Ascenty is committed to ensuring that no one suffers any kind of ill treatment for not participating in acts of bribery or corruption, or for voicing, in good faith, suspicions of actual or potential bribes or any other act of corruption that has occurred or may occur in the future. If you believe you have suffered any ill treatment, you must immediately notify the Compliance team. If the issue is not resolved, a Director must be informed.



## Bribes from third parties

Ascenty does not tolerate any bribery by third parties to secure business negotiations or to favor such third parties in negotiations.

In the event of questions or concerns about gifts, contact the Compliance team for more details.



## THIRD-PARTY PROTECTION

If you are a third party who feels harmed by any act of bribery or corruption committed by an Ascenty employee, in any business dealing, please contact Ascenty's Compliance team, which will then investigate the event and take the appropriate internal actions. It is important to emphasize that we guarantee you will be treated in accordance with the best practices and with complete transparency and integrity.

## REPORTING VIOLATIONS

Employees and third parties are encouraged to voice their concerns regarding any issue or suspected negligence as soon as possible, immediately notifying the Compliance team either in person or via the available whistleblower channels. If you are not sure whether a certain action constitutes bribery or corruption, or if you have any questions or concerns, please contact the Compliance team so that it may properly address each event and take appropriate action.

## INCIDENT OR VIOLATION

Employees and third parties who breach this Code of Conduct or Ascenty's Policies are subject to penalties. Depending on the gravity of the situation, these penalties may result in termination of the employment contract, in the case of employees, or immediately terminating any contracts, in the case of third parties (suppliers and customers).

It is important to emphasize that, if the action violates the laws of the country where the operation was established, the offender will be subject to prosecution by the appropriate agencies, as well as to civil and criminal penalties.

# Harassment

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Harassment means any action, conduct, or behavior that an individual or group of individuals may consider inappropriate, humiliating, intimidating, or hostile. We should avoid actions and behavior that are or may be interpreted as moral, sexual, or any other type of harassment. Furthermore, we should all be careful when it comes to actions or behaviors that may be acceptable in one culture, but not in another.

**Moral Harassment:** This is defined as exposing professionals to embarrassing and humiliating situations at the workplace, repeatedly and for an extended period of time. It's what is known as "moral violence." These actions aim to humiliate, disqualify, and emotionally destabilize the victim's relationship with the organization and workplace, which may put their health or their job at risk.

**Sexual Harassment:** This is defined as embarrassing colleagues by means of constant and embarrassing insinuations with the goal of obtaining advantages or sexual favors. These actions may be clear or subtle, explicit or insinuated, written or using gestures, and may come in the form of coercion or blackmail. Encouraging a posture based on respect and teamwork between professionals is one way to ensure a healthy workplace. All types of harassment must be reported.



# Whistleblower Channels

The following channels are available to report any violation  
to this policy:

By email to [compliance@ascency.com](mailto:compliance@ascency.com)

By calling this number from outside the company: +55 19 3517  
7665

By calling this number from inside the company: extension  
7665

Online at: [www.ascency.com/contato](http://www.ascency.com/contato) (form)



# Environment

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Ascenty cares about the environment and takes measures to maintain or minimize any kind of impact on nature.

Always put your trash in a proper container, and recycle paper, plastic, glass, and metal. At Ascenty, hazardous waste is handled in a way that does not pollute or damage the environment, and is disposed by specialized companies. Therefore, always check whether waste is being disposed correctly.

If you see a water or sewage leak, call the site manager immediately so that actions can be taken immediately.

All equipment that can pollute the air, water, or soil must be inspected periodically and must always be adjusted as indicated by the manufacturers.

Any activity that may impact the environment must be studied before being carried out so that actions can be taken to eliminate or minimize this impact.

If you identify an action taken by an employee, third party, or customer that may be impacting the environment, you must immediately notify your manager and file an environmental incident report so that the event can be analyzed and action can be taken to prevent the problem from happening again.



# Environmental Policy

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Ascenty is committed to the global environment and encourages its employees to carry out their activities sustainably, respecting:

- public environmental policies.
- natural resources, by recycling and efficient use.
- efforts to reduce generated waste and prevent environmental damage resulting from the company's activities.
- the use of environmentally sound procedures and technologies to manage products and services, aiming to continuously improve environmental performance.



# Information Security

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We must take care of information both internal and external, always respecting the “CAI” pillars: confidentiality, availability, and integrity. We must not disclose information without authorization, and we must always respect the information’s confidentiality level. When we receive privileged information, we must keep the information’s confidentiality level. Avoid talking about Ascenty business in the halls or in public places. Always keep your workplace clean and free of exposed confidential documents. These documents must always be kept in safe places where only you have access to them. Your work equipment, such as your cell phone, computer, and any external media (disk, pen drive, etc.), should always be password-protected and/or encrypted. Never leave equipment in public without your presence.

If you see an unidentified individual (i.e., not wearing a badge) on Ascenty’s premises, find out who is their contact at Ascenty and take the person to them, so that the person can be identified and have access only to permitted locations.

If you identify a security breach, contact the responsible person and have them file an information security incident. This will allow the breach to be analyzed and action to be taken to prevent the problem from recurring.

# Information Security Policy

Caring for our customers' assets while ensuring that the information contained within our data center remains available, with integrity and confidentiality.

- We maintain an active and effective physical and logical security force.
- We train and educate our employees about the importance of information.
- We protect our assets ethically and in keeping with the best practices in the market.





The following channels are available to report any violation to this policy:

By email to [compliance@ascenty.com](mailto:compliance@ascenty.com)

By calling this number from outside the company: +55 19 3517 7665

By calling this number from inside the company: extension 7665

Online at: [www.ascenty.com/contato](http://www.ascenty.com/contato) (form)