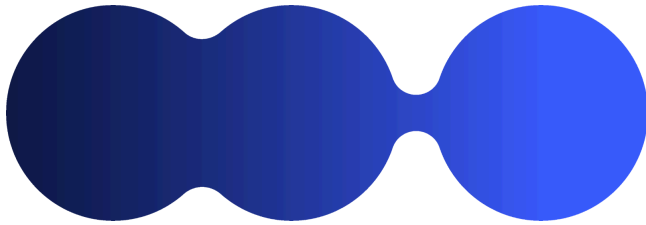




## 17. ENGLISH VERSION OF THE POLICY



# Legal & Compliance

## Code of Conduct for Customers, Suppliers, and Business Partners

### English Version

#### Public Information

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## 1. OBJECTIVE

Establish clear guidelines for ethical, responsible, and legally compliant relationships with Pipefy's suppliers, service providers, business partners, and customers, promoting integrity, sustainability, and fair business practices.

## 2. SCOPE

This policy applies to all external individuals and organizations acting as service providers, suppliers, clients, or business partners of Pipefy ("external parties").

## 3. ROLES AND RESPONSIBILITIES

The Procure to Pay and Legal & Compliance teams are responsible for:

- Clarifying any questions about this policy;
- Establishing, reviewing, and updating procedures for its implementation;
- Monitoring compliance and investigating potential violations;
- Disseminating the guidelines and conducting periodic training for partners;
- Supporting continuous improvements and providing assistance to relevant departments.

## 4. CONDUCT GUIDELINES

### 4.1. Human Rights

Pipefy strongly opposes all forms of child labor, forced labor, or practices similar to slavery, in accordance with the standards of the United Nations (UN), International Labour Organization (ILO), and applicable laws. Business relationships with organizations that violate these rights will be immediately terminated.

### 4.2. Diversity, Inclusion, and Belonging

We value a plurality of identities, backgrounds, and cultures. We expect our partners to promote a fair, inclusive, and respectful environment, free from discrimination and prejudice.

### 4.3. Harassment and Discrimination

We do not tolerate any form of moral, sexual, or other harassment or discrimination. External parties who witness or experience such conduct must report it immediately through Pipefy's Ethics Channel: <https://ethicschannel.pipefy.com>.



Violations may result in disciplinary measures and legal accountability, in accordance with applicable laws.

## **5. INFORMATION AND PRIVACY**

### **5.1. Confidentiality**

Privileged, technical, commercial, strategic, or other sensitive information may only be accessed after the prior signing of a Non-Disclosure Agreement (NDA). Unauthorized use is prohibited and subject to penalties.

### **5.2. Data Privacy and Protection**

Partners and suppliers handling personal data on behalf of Pipefy or its clients must:

- Comply with the LGPD (Brazilian General Data Protection Law), GDPR (EU General Data Protection Regulation), and other applicable regulations;
- Process data only according to documented instructions;
- Ensure data security, traceability, and secure disposal;
- Notify Pipefy in advance of any changes or international data transfers;
- Allow audits and maintain updated records;
- Disclose the use of subcontractors in advance and ensure their compliance with this policy.

## **6. Information Security**

Partners must:

- Adopt internationally recognized best practices (e.g., ISO 27001);
- Ensure access controls, incident management, and business continuity;
- Comply with applicable intellectual property laws.

## **7. PHYSICAL SECURITY**

Pipefy is committed to ensuring business continuity even under critical or challenging scenarios. All partners, suppliers, and customers must read, access, and strictly follow all health, safety, and hygiene guidelines made available.



## **8. OPERATIONAL BEST PRACTICES**

### **8.1. Virtual Meetings**

Recording or sharing virtual meetings without Pipefy's authorization is strictly prohibited.

### **8.2. System and Internet Use**

The use of Pipefy systems for improper activities such as spam, phishing, or social engineering is strictly prohibited. Violations will be addressed in accordance with our Terms of Use.

Questions: [security@pipefy.com](mailto:security@pipefy.com)

## **9. ARTIFICIAL INTELLIGENCE (AI)**

Partners using AI solutions in the services provided must:

- Inform Pipefy about the use of such technologies, including systems, purposes, and relevant automated decisions;
- Ensure transparency regarding the logic, operation, and criteria of AI models;
- Guarantee meaningful human oversight over automated decisions, enabling review and correction;
- Avoid using AI for profiling, marketing, or discriminatory purposes without formal authorization;
- Conduct impact assessments regarding user rights especially when processing sensitive personal data and make documentation available to Pipefy;
- Implement mechanisms to prevent algorithmic bias;
- Maintain updated records for auditing and compliance purposes;
- Notify Pipefy in advance of any significant changes to AI systems;
- Allow Pipefy to assess or review the systems to ensure adherence to transparency, ethics, and accountability principles.

## **10. SUSTAINABILITY**

We expect our partners to:

- Use natural resources rationally and sustainably;
- Assess and mitigate environmental impacts;
- Measure their carbon footprint;
- Consider the use of carbon credits where applicable.

## 11. FAIR BUSINESS PRACTICES

### 11.1. Conflicts of Interest

External parties must act with integrity and avoid decisions that result in personal gain or benefit to close third parties. Any suspected conflict must be reported immediately.

### 11.2. Gifts, Presents, and Hospitality

Only symbolic gifts valued up to US\$50.00 are permitted. Cash gifts are strictly prohibited. Items exceeding this value will be rejected or returned.

### 11.3. Relationship with Clients, Suppliers, and Partners

Engagements must be based on ethical, legal, and technical criteria, maintaining standards of integrity equivalent to Pipefy's.

### 11.4. Relationship with Authorities and Government Agencies

Offering undue advantages to public officials is strictly prohibited. Pipefy complies with applicable laws such as the Brazilian Anti-Corruption Law (Law No. 12.846/2013), the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and others.

### 11.5. Political Positioning

Pipefy maintains a neutral stance on political and partisan matters. Our business relationships must not be used for political purposes or to support political parties or candidates on behalf of the company.

## 12. COMPLIANCE MONITORING AND SANCTIONS

Pipefy may conduct audits, periodic reviews, and monitoring to ensure compliance with this policy. Non-compliance may result in:

- Request for immediate remediation;
- Temporary suspension of services;
- Contract termination;
- Legal accountability as per applicable law.

Suppliers and partners must fully cooperate with audits and verification processes.

## 13. ETHICAL CHANNEL

An external, secure, and confidential channel for reporting violations of this policy or the Code of Conduct.

False reports will be considered misuse of the channel. Retaliation against whistleblowers will not be tolerated.

Access: <https://ethicschannel.pipefy.com>

## 14. FINAL PROVISIONS

This Policy becomes effective as of the date of its publication.

## 15. GLOSSARY OF TERMS AND ACRONYMS

- LGPD – General Data Protection Law (Brazil)
- GDPR – General Data Protection Regulation (European Union)
- NDA – Non-Disclosure Agreement
- ILO – International Labour Organization
- UN – United Nations
- EHS – Environment, Health, and Safety
- FCPA – Foreign Corrupt Practices Act (U.S.)
- AI – Artificial Intelligence

## 16. REVISION HISTORY

#	Date	Description
1.0	Jul 8, 2022	Creation
2.0	Fev 23, 2023	Inclusion of new whistleblowing channel and template update
3.0	Mar 10, 2023	Adjustment to "Data Privacy" section
4.0	Mar 13, 2023	Addition of new rules to "Information Security" section
5.0	Feb 15, 2024	Annual review, whistleblowing channel update, and adjustment of gift limit

#	Date	Description
		to US\$50
6.0	Mar 21, 2025	Annual review
7.0	July 08, 2025	Inclusion of "Artificial Intelligence (AI)" section with specific partner and supplier guidelines