



# DOCKER CODE

**DOCK CODE OF ETHICAL CONDUCT**

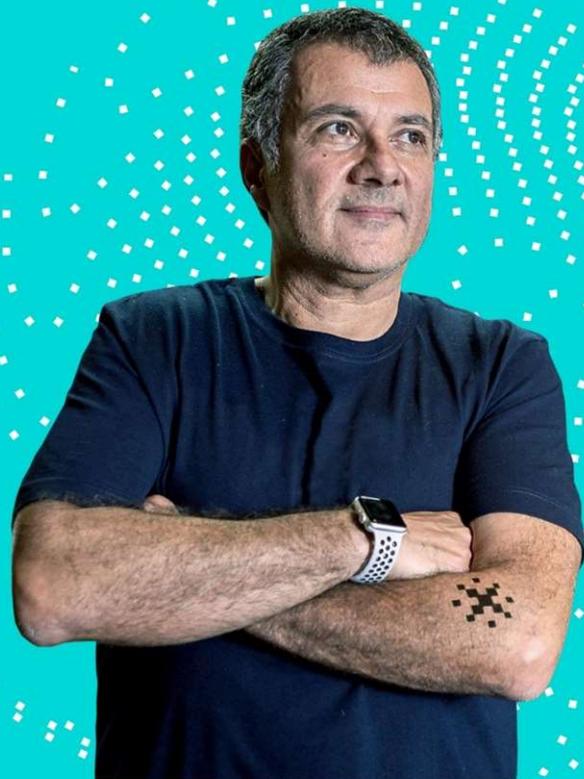
DOCK  
SEPTEMBER/21



## LEADERSHIP MESSAGE

We are agents of construction and transformation of the future financial market in Brazil and in the world. That's because of the technology we develop and improve every day, together with our teams, serves as basis for millions of people to have more and more access to digital banking and payment services.

Along the way, from the acquisition of Conductor in 2014 to the point where we unified all of our companies into a single brand, Dock, we grew very rapidly and nowadays we are the leading providers of financial technology for Latin America. We deliver to our customers a solution that integrates end-to-end the financial chain that exists between the payer and the payee: we see beyond and what has not yet been built in this market, we will offer in a simplified, modular, flexible, and secure way to our customers.





Currently, we are more than 1400 employees in the company and we have a work environment that fosters creative autonomy, the sense of leadership and responsibility in everything we do and build. Together, we have formed a team that will develop a global payments platform for companies of all sizes and industries, being the technology behind the financial solutions that will transform this ecosystem.

To support this growth, we need strong foundations that will provide us with reliable guidelines. The code of ethics is a fundamental part of this process, so let's join forces to be our best versions for the benefit of Dock, where each one of us is part of something bigger and, therefore, our actions are important.

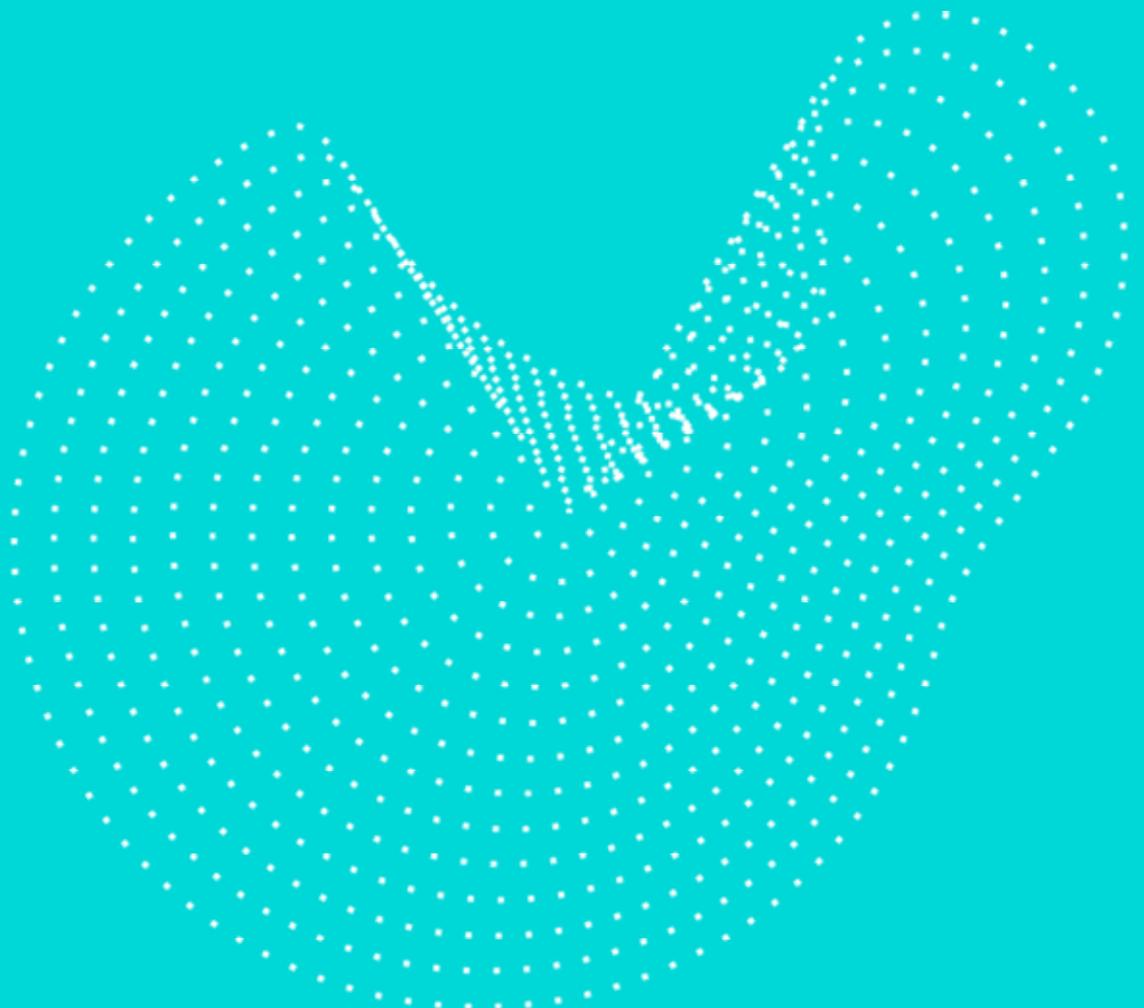
Read the document carefully and be sure that not only me, but our entire leadership will be at the disposal for any questions, problems, or difficulties related to the topics covered herein. And, most importantly, make a daily practice of a transparent and honest management with your teams.

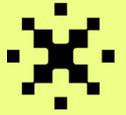
I count on you to keep on revolutionizing, with responsibility and through a daily practice of transparent and honest management within our organization.

We are just getting started!

Thank you!

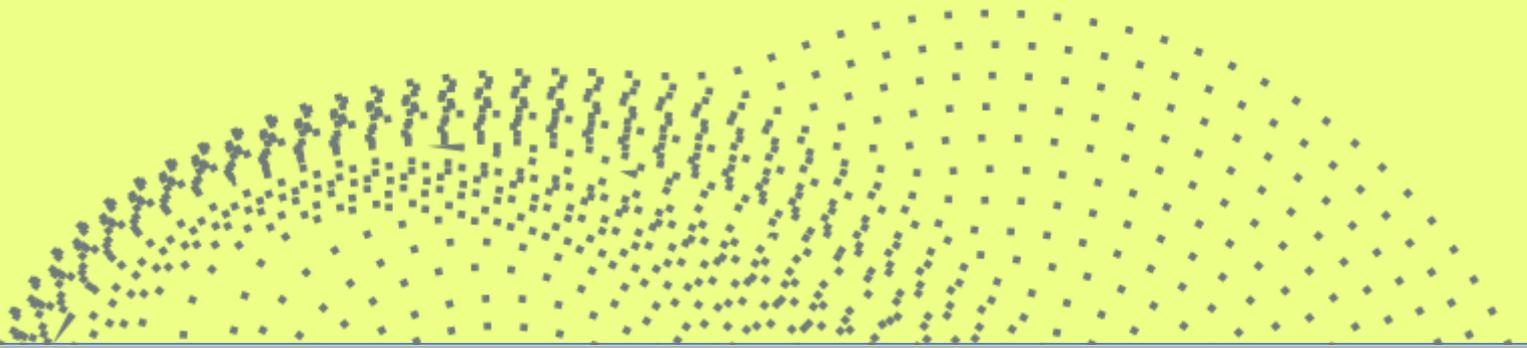
**Antonio Soares.**  
**Dock CEO**

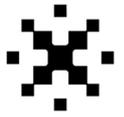




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# 1. Introduction to the Code

This material brings together the ethical values that guide our decisions at Dock. Our entire team (regardless of the area or position, whether third party or supplier – while represents Dock) is responsible for looking after these behaviors and helping and ingraining them more and more in our daily lives.

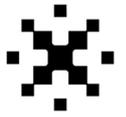
In this document we summarize many of the key policies relevant to Dock by establishing minimum standards of conduct expected in all the places and people with whom we operate in our journey, whether the internal public, third parties, or stakeholders of our organization.

Here is our starting point to help you understand the standards we must follow every day, know to whom to turn to for help or guidance, and identify potential compliance and ethics risks that apply to Dock.

The principles described below are valid for all employees and directors, regardless of the area or level of operation, and must be incorporated immediately and directly into the procedures, activities of all areas and units of the company.

We have a strong commitment to all our values, which become stronger and more sound every year, and if you have come this far, it is because you are part of building an organization of integrity, equality, and pride for all of us.





## 2. Dock's Values and Principles

Our company values are the drivers of the culture and help us to structure everyone's relationships and behavior.

These are the values that guide our evolution and are cultivated on a daily basis within our team. Shall we remember?

### **We are relentless**

We believe in constant evolution. We are persistent to do better than what has been done before.

We dive deep into our challenges and use our knowledge to turn them into solutions that really make a difference.

We are reference, we have raised the bar and taken the market to another level.

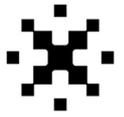
### **We dare the impossible**

We question everything, all the time.

We are always looking for new alternatives and possibilities to go further. We take every step with the responsibility and the certainty that we will transform the future, without fear of facing ideas capable of propelling us towards a new direction.

We take risks even if for many it doesn't seem to make sense, and we make it happen even when it seems impossible.





### **We dream our clients dreams**

For us, our clients are the true vectors of market transformation, and we are sure about one thing: if a client can dream, we can make it happen.

We win our clients over with our obsession for shaping their challenges, our comprehensive view of the business, and our ability to deliver.

### **We are nimble**

We believe that our quickness in adapting ourselves and responding to transformations puts us always ahead of the curve to be agents of change.

We move with agility and a speed that surprises, whether in the responsiveness of our strategy, the design of a solution, the implementation and execution of a project, or the day-to-day communication.

### **We embrace different perspectives**

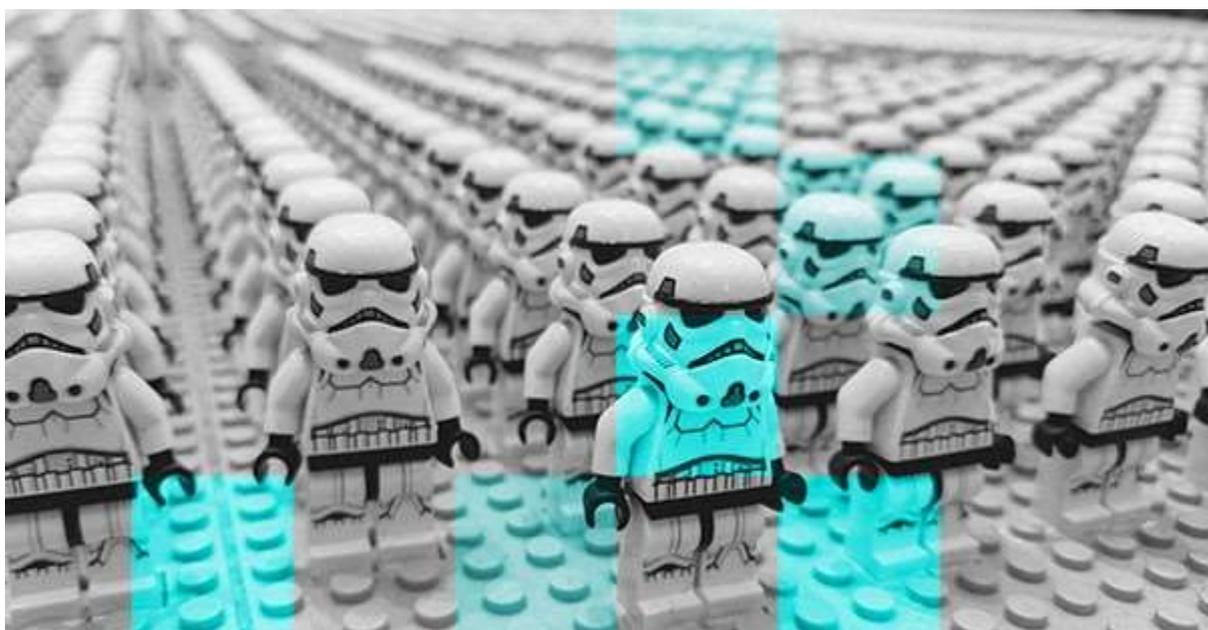
We believe that diversity is the essence of innovation, and that is why we have built an environment of equity, inclusion, exchange, and learning that ignites our ideas.

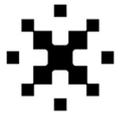
For us, good ideas can come from anywhere and at any time. At the same time, we feel free to disagree and debate different points of view, as equals.

### **We go further together**

Behind every code, every processing and every transaction there is a team – before being a technology company, we are a people company.

We work with collaboration and autonomy, recognizing and celebrating collective achievements – both internal and those of our clients – because we believe that together we go further.





## 3. Ethical guidelines

We believe that ethics and integrity is something that must be reinforced at all times, whether in relations with our team, business partners, or the market. The ethical guideline of an organization is related to the conscious effort to treat all people (individuals and legal entities) with respect and to establish a harmonious and positive work environment among all those involved in the relationship chain.

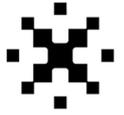
In view of this, Dock treats and believes that diversity is everyone's role to promote an environment of respect, encouraging people to always reach their best performance, regardless of their choices.

We believe that building diverse teams is a key ingredient to foster innovation. Only in an environment free of harassment, prejudice, and intimidation Dockers will be able to contribute with their best performance and thus build a better company. Therefore, we do not tolerate:

- Any comment or attitude that could be seen as embarrassing or humiliating;
- Moral or sexual harassment, intimidation or physical violence;
- Any kind of discrimination, either racial, sexual, gender identity, health, ethnic, religion, disability, social class, politics, age, nationality, origin, physical appearance, or family situation, among others.

Now, learn more about our ethical guidelines.





## 3.1 Money Laundering

### **What does it mean?**

Money Laundering consists of the concealment or dissimulation of the nature, origin, place, provision, movement, or ownership of assets, rights, or values arising, directly or indirectly, from criminal offense and related. These practices occur by transactions, which purpose is removing or impairing the tracking of the illegal origin of the resources;

### **How do we act?**

Dock repudiates any such conduct in this sense, and its employees must take all necessary steps to combat such activities and prevent the company's operations from being used for money laundering and terrorist financing.

Currently we have several electronic controls and procedures that ensure a safe operation; however, relying on your ethics and collaboration is fundamental. In case of suspicion, immediately report it to your manager, the compliance team, or the PLD team on our communication channels.

## 3.2 Corruption and Frauds

### **What does it mean?**

Corruption is the abuse of power or authority by a person, seeking advantage for him/herself through any act that involves the promise, offer, or delivery, directly or indirectly, of any undue advantage to a public official with the purpose of obtaining a benefit.

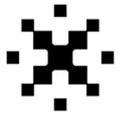
### **How do we act?**

Dock does not allow any wrongful act in the exercise of its activities or as a result thereof. Any corruption and bribery practice is also not tolerated, either actively or passively.

Fraud occurs when an employee or partner intends to receive an undue advantage by using the company as an intermediary. We do not tolerate any situation of fraud and/or breach of trust, and it is everyone's duty to protect the integrity of the company.

Thus, the employees undertake to:

- Not to perform any action that involves data handling, tampering, and forgery of documents or information;
- Not to offer or accept possible bribes, including kickbacks or any other kind



of advantage to themselves or to the company;

· Not to use the position, professional status, or image of Dock to obtain advantages for themselves, the company or third parties.

### 3.3 Compliance with the Laws

#### **What does it mean?**

Dock's activities are subject to the internal and external laws, rules and regulations, which must be fulfilled by all of its employees. The argument of not knowing these standards in general is not valid to support possible violations.

#### **How do we act?**

We expect Dockers to know, obey, and make their coworkers aware of the laws, rules, and regulations that affect our business and their own work in order to perform their professional duties and life in society to the highest ethical standards.

### 3.4 Relationships with partners and suppliers

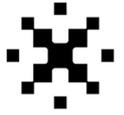
#### **What does it mean?**

The relationship with our partners and suppliers is based on the guidelines in our Code of Ethical Conduct. We practice the free competition, transparency, and impartiality in the process of hiring suppliers, as well as the compliance with all our agreements.

#### **How do we act?**

We always seek to follow the principles of:

- Contacting the purchasing area to perform the acquisition of new goods and services;
- Stimulating the constant improvement of the processes of new suppliers, this enriches the relationship and brings improvements to our services;
- Searching for suppliers or partners that act in accordance with the legislation in force, including labor rights, local legislation, fiscal and tax, but not limited to these
- items;
- Searching for partners and suppliers that adopt management practices that comply with the human dignity and ethics.



## 3.5 Presents and Gifts

### **What does it mean?**

In commercial relationships and between partners it is common to exchange presents and gifts, especially on commemorative dates, such as Christmas, renewal of agreement, and the like.

### **How do we act?**

For the avoidance of doubt, in the intention of the commercial relationships, we permit the receipt of gifts that contain the partner's logo as a form of advertising or that are limited to the value of 100 US Dollars, provided that they do not constitute exchange of favors or undue advantages.

The offering and/or receiving of any benefits must be in compliance with the law and must not breach the internal policies of the company.

In the event of unintended receipt, or in situations where it would be embarrassing or rude to refuse a gift, we recommend that you report the situation to your manager and the compliance team as soon as possible.

## 3.6 Sponsorship and donation

### **What does it mean?**

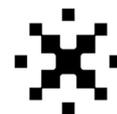
The donation is a voluntary support offered without the expectation of receiving anything in return. The receipt of any compensation is contrary to the principle of donation and can have serious tax, administrative, and even criminal consequences for Dock and its Directors.

Sponsorships refer to the promotion of the name and image of the company, its products or services through its association with events, sports activities or cultural organizations.

### **How do we act?**

Dock recognizes its responsibility in educational, cultural, and social matters. However, whenever there is the intention of the company to make a sponsorship or donation, the Compliance Management must be involved from the moment of the choice of the institution to be benefited in order to carry out a previous analysis and verify if it is in compliance without values.

Under no circumstances donations and contributions can be made to individuals or legal entities that could damage the company's reputation, regardless of who the



beneficiary is.

## 3.7 Political contributions and campaigns

### What does it mean?

It is strictly prohibited to make donations on behalf of Dock for political purposes to any individual, party or related organization, or even to affiliates of a party or candidates of a political party in any circumstances, either directly or through third parties.

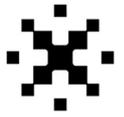
### How do we act?

It is hereby established the prohibition of the following cases below:

- Authorizing the use of the brand and/or image of the company by any candidate, political party, individual or related organization for purposes of political campaign;
- Making any type of political campaign at company's facilities;
- Using Dock's resources (computer, cellphone, etc.) to participate of events with political purposes.

Those employees that are political candidates must immediately inform Dock's Compliance team.





## 4. Conflicts of interests

This occurs when a person's private interest interferes or appears to interfere, in some way, with the interests of the company.

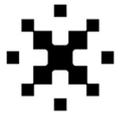
Some examples of common conflicts of interests are:

- Favoring an employee, through friendship or kinship, in promotion or merit events;
- Kinship between employees with hierarchical subordination relationship in the company (leader and subordinates) or acting under the same management;
- Hiring of a supplier, to the detriment of another with a better offer and technical capacity, due to friendship or kinship relations with the supplier's representatives;
- Using confidential information of the company, partners, clients and suppliers for own benefit or of third parties.

It is important to mention that having or witnessing a conflict of interest does not necessarily represent a Code of Conduct violation. But, not reporting does!

If you are in a potential conflict of interest situation here at Dock, even if it is only possible or apparent, please inform the Compliance team.





## 5. Ethics Channel

Dock provides an ethics channel to any employee who wishes to report a violation of this Code of Conduct or any law or regulation applicable to the company.

Our Ethics Channel, referred to as Safe Space, is hosted on a safe external provider and can be easily accessed by our website. All reports received through the platform that indicate an irregularity or alleged irregularity shall be carefully investigated by a team specially assigned for the event.

The employee can choose to report anonymously or not, although it is still necessary to provide the information applicable to the investigation. In this sense, Dock ensures the protection and confidentiality of each case, which shall be further addressed and discussed in resolution in the Compliance committee.

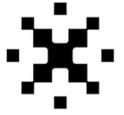
If you have made a report, make sure that your identity is strictly confidential and that you are protected from any kind of retaliation, practice we strictly forbidden. And should this occur or should you experience any kind of difficulty derived from your report, please contact the Compliance.

### 5.1 What to do in the case of non-compliance with the code and other internal rules, polices, and guidelines?

Any action that goes against what is described in this document and/or is in disagreement with Dock's values and policies will receive the appropriate treatment, including the application of disciplinary actions, defined according to the violation severity.

Understanding that our work environment is dynamic and flexible, we are aware of that it is not possible to predict all possible situations and interpretations. Therefore, we count on you to maintain the same care in collaboration with the company, reporting cases where irregular situations are witnessed with other employees, if necessary. To that end, in addition to the ethics channel, the direct communication with Compliance also remains available as an open channel.

Remember: we are directly responsible for incorporating the principles of this Code into our daily work routines, as well as encouraging others to do the same. This



movement, when shared, gains a lot of strength internally!

## 6. Sustainability

Dock is committed to manage its business in an environmentally and socially responsible manner. To this end, we include environmental, social, and governance (ESG) factors in all our daily activities and operations. Complying with the sustainability purposes requires a collective effort in which we need to take an active role, and we count on you to do this.

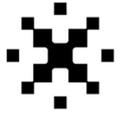
## 7. Workplace

Dockers' work model is internally known for being anywhere office, but the contractual basis is with remote working format. In view of this, it is very important to mention suggestions for measures and rules that allow this ecosystem to function well:

- Look for a place with privacy and no distractions;
- Take breaks regularly and do not forget how important it is to take care of your physical and mental health with the help of our Postural Blitz and Zenklub platforms;
- Have a workspace that is comfortable and appropriate for your occupation and deliveries, because this helps you to improve and maintain your work performance. Remember that Dock offers all tools for this, so take advantage of it!
- It is prohibited the exercise of another activity while you are working here at Dock, but that does not prevent you from, for example, selling and advertising personal items or other people's work here. If you have any activity that is additional to your official agreement with Dock, please inform the Compliance team through the following e-mail: [compliance@dock.tech](mailto:compliance@dock.tech);

Remember that here you can work from anywhere, because the most important thing for us is that all employees feel comfortable to carry out their activities in the most productive way and, above all, are happy.

And, obviously, always with a lot of responsibility!

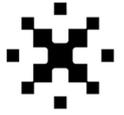


## 8. Privacy, use of technology and data protection

The guidelines below were based on our Information Security Policy and on the Brazilian General Data Protection Act (LGPD).

Regardless of our position at Dock, we are all responsible for ensuring the information security and act according to the Guidelines, Policies, Laws and Regulations not to put the confidentiality of the information at risk, following the principles below:

- New technological resources should be submitted to the analysis of Dock's Information Security area, in order to ensure that they do not present new security risks to our operation;
- Use information and technology resources conscientiously and in accordance with the established standards and policies;
- Information is an important asset for Dock and should be protected against the non-authorized access, undue disclosure, loss, destruction, and forgery;
- All information should be stored securely, so always look for the best way to do this;
- Dock's printed documents that are no longer used should be destroyed in an appropriate form;
- Never write down passwords in notebooks or any physical medium. Also, do not save or share your password with other employees and on devices other than those provided by the company;
- Do not write down personal, client, or corporate information in notebooks or any other physical medium, nor transmit it by communication applications other than those approved by the company and made available for this purpose;
- Always lock your computer when leaving or moving away from your workstation;
- In exposed and/or public places, do not leave any technological device unaccompanied;
- We recommend that you have the VPN connection enabled in order to protect data traffic;
- The use of Internet and other corporate communication tools is restricted to subjects related to the work. It is strictly forbidden to access or send subjects related to racial, sexual discrimination, pornography, religious, political, entertainment, relationship, chain proliferation, malicious content that may spread virus or attack content to the company;

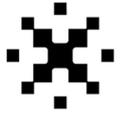


- The messages from electronic mails with company's address are Dock's official document. When sending a message, confirm that the recipients are correct, that you really need to send attached files, and do not open messages that you suspect are unreliable;
- Registration of Dock's e-mail on "untrusted" websites or not related to your professional activities is prohibited;
- Beware of strange messages, whether by e-mail, Whatsapp or phone calls, as it may be a scam or social engineering;
- Information contained in the company's network, electronic devices and corporate communication tools is Dock's exclusive property, which reserves the right, at any time, to access, monitor, audit and evaluate this information;
- It is not allowed to install any unapproved software, as well as software that does not have the respective license from the manufacturer;
- The Employee cannot change the setting, add or remove components from electronic equipment from the company, which should be returned in its original form, when replaced or there is the termination of the employment relationship, except for acts of God or events of force majeure.

All corporate devices, such as servers, notebooks, tablets, cellphones approved and provided by Dock are monitored and audited in accordance with the procedures established in the Information Security Policy.

It is not allowed to maintain in the computer of the company personal files, images, or videos not related to the professional activities, or that have any improper content, such as, for example, pedophilia, pornography or that makes apology for terrorism, organized crime or content related to any forms of discrimination, regardless of their nature.

The innovations, new products and processes that are created during the activities carried out within the work period, either at the company's facilities, during external works, or home office, shall be considered Dock's properties.

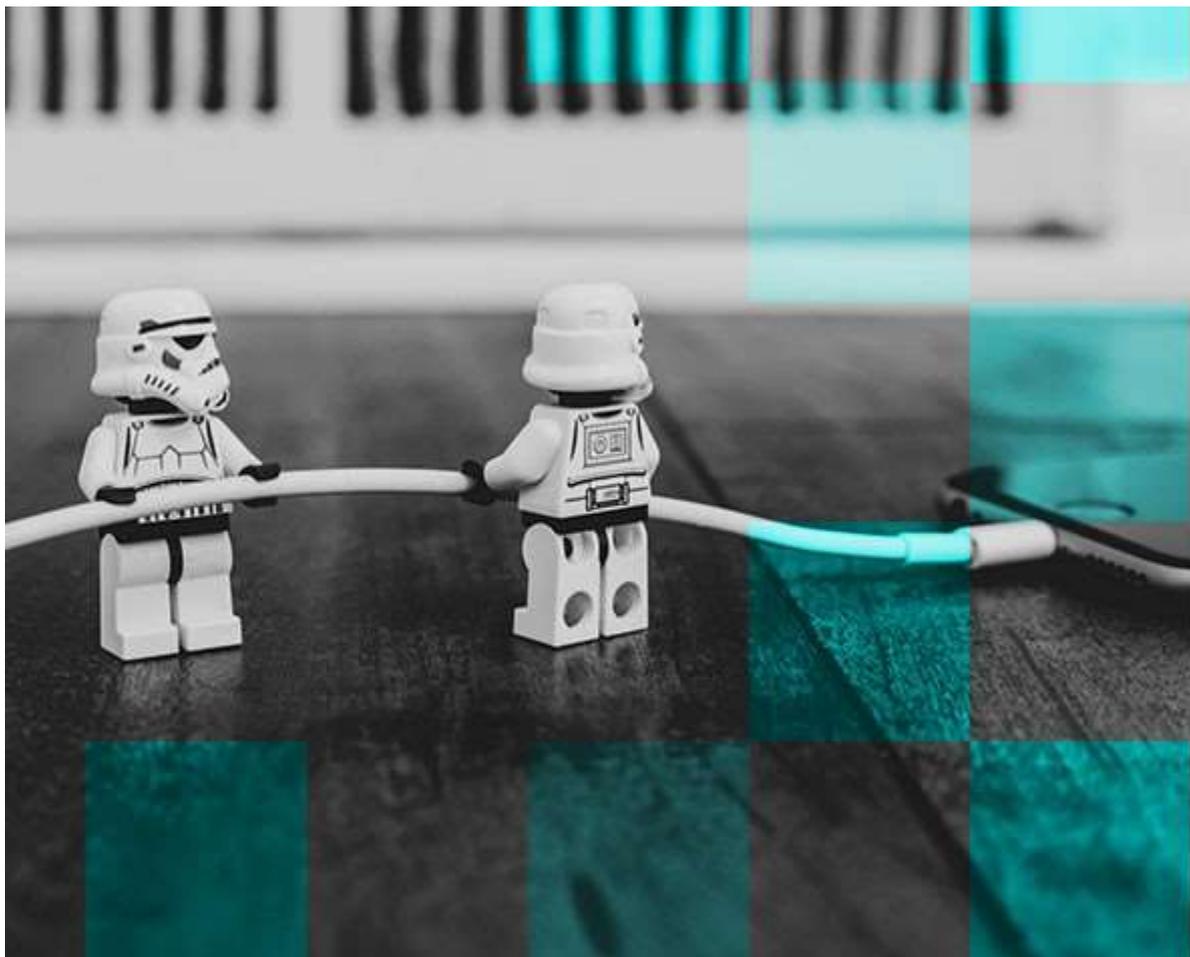


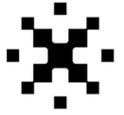
## 9. Confidential Information.

As an employee, you know that you should not comment on and disseminate confidential, internal, or sensitive data outside the work environment, right?

It is your duty to protect this information that is company's interest and essential for the continuity and success of our operations. Do not forget that the smallest piece of information revealed, even if it seems harmless, can be the tipping point for obtaining various pieces of information.

Avoid making comments on corporate matters outside working hours or with people outside the company and remember that any and all communication to the press must be previously approved by the board, thus avoiding damage to the brand.





## 10. Final provisions

Here at Dock, we see our team's autonomy and freedom as the basis for evolution, and they are non-negotiable values. We are free to create, improve, and make mistakes in our daily routine, because we believe we are building a leading market company and, consequently, a better world.

We question the traditional market and, at every move, we challenge the existing *status quo*. So, also in ethics, we will be an example of the positive changes not only in our company, but also in all the places where we Dockers have our relationships.

Now that you already know our Code of Ethical Conduct, if you are still unsure of what to do in a certain situation, always think about the following: "Am I really comfortable to do it? Would I share this behavior of mine with colleagues and manager in a quiet and normal way?"

Finally, this term is an integral part to the employment agreement and can be replaced by another, whenever Dock deems convenient or due to eventual changes in the labor legislation.

In the event of doubts, please contact our Compliance team for further clarifications through our communication channels mentioned in this Code.

We are counting on you.  
Thank you.