



TIS CODE OF CONDUCT AND ETHICS

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PRESENTATION

TIS believes that the achievement of its long-term interests is necessarily based on strict compliance with the highest standards of ethical conduct. TIS is convinced that daily concerns about efficiency or economic growth cannot be dissociated from ethical and responsible conduct.

This document expresses TIS's commitment to ethical conduct in its internal and external relationships, with the objective of reinforcing applicable ethical standards and creating a work environment that promotes respect, integrity and equity.

This code is applicable to the entire company and binds all TIS employees and collaborators, regardless of their function or hierarchical position.



MAIN OBJECTIVES OF THE CODE OF ETHICS

- To be a formal and institutional reference for the personal and professional conduct of all TIS Workers, becoming a standard of relationship between them and with customers, partners or suppliers and other Stakeholders;
- To cement, in the company, the existence and sharing of common values and standards of conduct, reinforcing a common culture;
- To promote relationships of trust between TIS and its partners;
- Reduce the subjectivity of personal interpretations of moral and ethical principles;
- Responding to the civic challenge of promoting the construction of a fairer and more sustainable society.

• SCOPE OF APPLICATION

- TIS Workers and Collaborators must be committed to this Code of Ethics and Conduct, as it applies to everyone, regardless of their employment relationship, as well as the hierarchical position they occupy.
- An Employee must be understood as all members of the company's governing bodies, staff and other employees, regardless of the contractual relationship.

• NATURE OF THE RULES

- The TIS Code of Conduct and Ethics aims to ensure the practice of professional conduct of a high moral standard by all TIS employees and collaborators, in addition to the legal and regulatory provisions that they must observe.
- The rules contained in TIS's Code of Ethics and Conduct are also a reference for all those who interact with TIS with regard to the standard of conduct required in the company's relationship with third parties.
- Violation of the Code of Conduct and Ethics constitutes a serious misconduct, subject to disciplinary or other applicable proceedings.

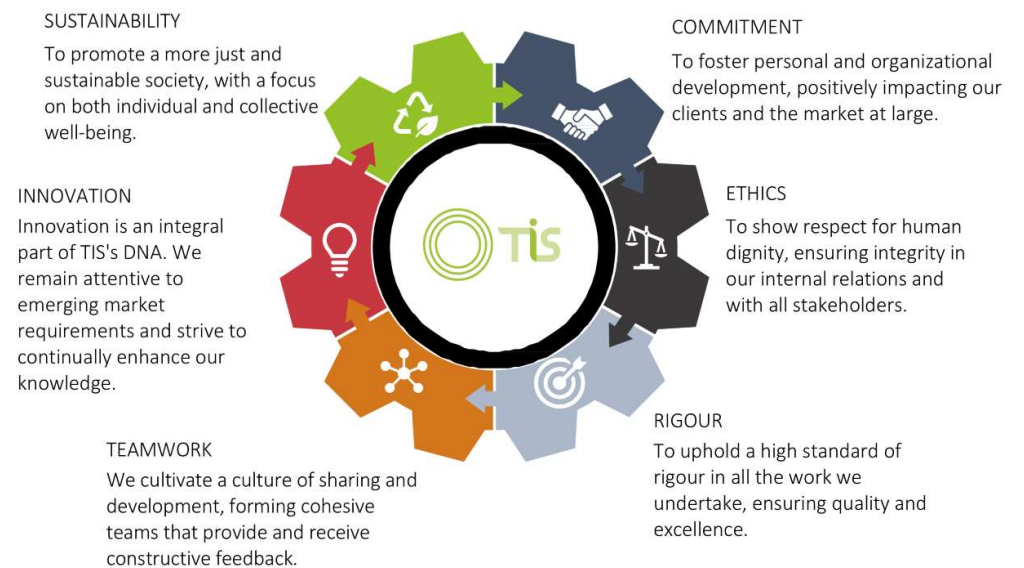
MISSION AND VALUES

- TIS's mission is to provide services to "Create efficient, innovative mobility and accessibility solutions suited to the needs of people and territories".

VALUES: TIS's core values are:

- Compromise
- Ethics
- Rigour
- Teamwork
- Innovation
- Sustainability

VALUES @ TIS | THE VALUES WE AIM TO EMBODY...



CONDUCT OF CONDUCT | SHAREHOLDER RELATIONS

- In the relationship between TIS and its shareholders, the following principles are upheld:
- Value Creation: the company undertakes to maximize, in a sustained manner, the creation of value for its Shareholders, in strict compliance with the company's values;
- Accuracy: financial and management information will transmit in a faithful, current, complete and true manner, the company's patrimonial situation, its results and responsibilities, as well as the most relevant policies adopted.
- Insider Trading and Abuse of Information: TIS ensures respect for the protection and non-abusive use of insider information, imposing on its Shareholders strict compliance with the legal or regulatory rules in force.

• CONDUCT OF CONDUCT | CUSTOMER RELATIONS

- All TIS Employees must have as the main focus of their actions, the development of a relationship of empathy and trust with customers, based on the best value proposition, in order to ensure the full satisfaction of our Customers.
- In contact with Customers, it is necessary that Employees perform their activities in accordance with the commitments assumed by TIS:
 - Deserving the Customer's trust;
 - Informing with transparency and truth;
 - Adopting an attitude typical of an organization dedicated to the provision of services;
 - Treating Customers with professionalism, respect and loyalty;
 - Providing Customers with excellent products and services;
 - Providing Customers with the information necessary for informed decision-making and ensuring scrupulous compliance with the agreed conditions;
 - Respecting the privacy of Customers' information and complying with applicable legislation.

• CONDUCT OF CONDUCT | RELATIONSHIP WITH SUPPLIERS AND PARTNERS

- In the relationship with suppliers and partners, it is necessary to meet three principles of behavior:
- **Responsibility in Selection:** TIS selects Service Providers, Suppliers and Partners based on clear and impartial criteria, and one of the criteria for its selection is that TIS is not aware of the practice by those of conducts that conflict with the rules contained in this Code.
- **Integrity:** TIS acts with loyalty and good faith in its relations with its business partners, establishing clear and objective communication with them, with a view to consolidating a long-term relationship of trust.
- **Transparency:** TIS adopts procedures guided by principles of economic rationality and efficiency. Its business practice is transparent and fair, and no form of abuse and bribery, corruption or money laundering is tolerated.

CONDUCT OF CONDUCT | RELATIONSHIP WITH THE COMPETITION

- TIS respects legal rules and market criteria, promoting fair and healthy competition.
- The relationship with the Competitors obeys rules of cordiality and mutual respect.
- In this context, we ensure the respect of intellectual property and the correct citation of competitors' previous works when provided by our clients and used in our projects.



• CONDUCT OF CONDUCT | RELATIONSHIP WITH PUBLIC AUTHORITIES

- In the relationship with the Public Authorities, the following principles are defended:
- **Cooperation:** TIS has a cooperative attitude with all levels of the Administration guided by rules of transparency and independence, with full availability and openness to improve the legal environment of its business.
- **Independence:** TIS has an independent stance vis-à-vis public institutions and political parties, without prejudice to professional relationships. It does not, under any circumstances, fund political parties or organisations whose mission is essentially political.
- **Respect/Compliance with Obligations:** the applicable national and international legislation in force is strictly observed, in the geographies in which it carries out its activity, and all its obligations of legal or contractual origin are fulfilled. All information requested and required under the law will be provided to public and supervisory entities, in a rigorous, appropriate and timely manner.

• CONDUCT OF CONDUCT | COMMUNICATION POLICY AND PROFESSIONAL SECRECY

- **Communication Policy**
 - TIS implements a rigorous communication policy, guided by standards of ethics, integrity and transparency towards the media, safeguarding the secrecy and preservation of confidential information within the interests of the company.
 - It acts to ensure symmetry in access to information, with full respect for the applicable legal and regulatory standards, avoiding mistakes, exaggerations and concealment of relevant information.
- **Confidentiality and Professional Secrecy**
 - Professional secrecy applies to all Workers and collaborators, especially in situations where, due to their importance or existing legislation, they should not be known to the general public.
 - Cases of information classified as confidential by the customer will be especially taken into account, as well as all those that may jeopardize compliance with the RGPD

• CONDUCT OF CONDUCT | COMMUNICATION POLICY AND PROFESSIONAL SECRECY

- TIS workers are encouraged to adopt a cautious and reserved stance when contacting the media. Although freedom of expression or participation in interviews is not restricted, it is essential that external communication is aligned with the company's values and interests, avoiding statements that could compromise the confidentiality of information, cause ambiguous interpretations or harm institutional reputation. It is recommended that employees consult the person responsible for communication or the Executive Committee in advance to ensure that the content covered complies with the guidelines of the Code of Ethics and Conduct.

• TIS RULES OF CONDUCT

1. **Value creation:** TIS conducts its business with a vision of long-term value creation, respecting the principles of sustainability and corporate social responsibility
2. **Protection of Rights:** TIS observes the principles and values contained in national and international legislation on Human and Social Rights. Discriminatory behavior on the basis of sex, race, ethnicity, religious conviction, party affiliation, or other is not allowed, and equal opportunities are promoted, integrity and dignity in the workplace are ensured.
3. **Bribery and Corruption:** TIS condemns any acts in which compensation or benefits are offered or accepted that influence the behavior of others in order to obtain advantages.
4. **Transparency:** TIS values and encourages the participation of its Workers, promoting effective processes of communication, consultation and sharing
5. **Personal Development and Professional Progression:** TIS attaches a high value to the professional and personal development of its Workers, promoting their permanent training as an element that enhances their best performance and motivation.
6. The selection, remuneration and professional progression policies adopted are guided by criteria of merit and market reference practices.

• TIS STANDARDS OF CONDUCT (CONTINUED)

6. **Participation:** TIS values and encourages the participation of its Workers, promoting effective processes of communication, consultation and sharing.
7. **Hygiene and Safety:** TIS provides a healthy, safe, pleasant work environment that promotes the well-being and productivity of Workers.
8. **Environmental Awareness:** TIS adopts and encourages the responsible use of natural resources and the preservation of the environment, namely by promoting eco-efficient management that minimizes the environmental impacts resulting from the company's activity.

• STANDARDS OF CONDUCT FOR WORKERS

- 1. Interpersonal Relationship:** the relationship between all Workers must be guided by mutual respect, loyalty, cooperation, honesty and clarity of communication, in the joint search for excellence in the collective result.
- 2. Integrity and Loyalty:** Employees at TIS are prohibited from using this quality or their hierarchical position, as well as the image, name or TIS brand, for personal benefit, their family members or any third parties. In the exercise of their duties and in internal and external relations, Workers must adopt a suitable and dignified behavior, safeguarding the prestige of the company and its brand.
- 3. TIS Employees shall apply this standard with special attention in their online relationship, always referring to the company with respect, loyalty, common sense and in line with the general alignments of this Code of Ethics and Conduct.**
- 3. Responsibility:** Workers must perform their duties responsibly and professionally, protecting the company's assets through a sensible and rational use of resources.
- 4. Confidentiality:** Employees are obliged to protect the confidentiality of the information to which they have access in the exercise of their duties and may not use it to obtain advantages for themselves or for third parties.
- 5. Insider Trading and Abuse of Information:** Workers who have access to inside information, in any capacity, are expressly prohibited from transmitting it, using it or facilitating its use by third parties for their own benefit.

• STANDARDS OF CONDUCT OF WORKERS (CONTINUATION)

6. **Conflict of Interest:** Workers must not intervene in decision-making processes that involve, directly or indirectly, organizations with which they collaborate or have collaborated or people with whom they are or have been linked by ties of kinship or friendship.
 - If it is impossible to refrain from intervening in the above-mentioned processes, they must inform their hierarchical superior of the existence of these links. Workers must refrain from participating in or performing functions in organizations, in which the activity to be carried out may conflict with the fulfillment of their duties at TIS or whose purposes may be contrary to those of TIS.
8. **Responsibility:** Workers must perform their duties responsibly and professionally, protecting the company's assets through a sensible and rational use of resources.
9. **Confidentiality:** Employees are obliged to protect the confidentiality of the information to which they have access in the exercise of their duties and may not use it to obtain advantages for themselves or for third parties.
10. **Insider Trading and Abuse of Information:** Workers who have access to inside information, in any capacity, are expressly prohibited from transmitting it, using it or facilitating its use by third parties for their own benefit.

• STANDARDS OF CONDUCT OF WORKERS (CONTINUATION)

11. Property Protection: TIS's assets are for professional use only, and its use for one's own benefit or that of others is prohibited. It is everyone's responsibility to ensure the protection and conservation of the company's physical, financial and intellectual assets, and resources must be used efficiently. Whenever possible and advisable, the intellectual capital of the company should be protected through the registration and establishment of patents.

12. Security protection: Workers must behave in accordance with safety standards, which prevents the occurrence of accidents and does not endanger the company's assets. They must take care of the company's financial resources with great diligence, protecting them from loss, theft or misuse.

13. Responsibility: This Code is not intended to cover all possible situations that may occur. It was developed with the aim of providing a reference framework, against which all activities should be evaluated. Workers should seek guidance in case of doubt as to the proper course their actions should take in a given situation, as it is the sole responsibility of each Worker to "take the right action" and such responsibility cannot be delegated.

• DISCLOSURE

- This Code is disclosed on the company's Intranet page, as well as through other internal means.
- At the time of formalizing the employment contract, each Employee signs a declaration attesting to having knowledge of the Code and the individual commitment to its compliance.
- Any questions relating to the interpretation or application of this Code should be reported to the Executive Committee.

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