



monkey

CODE OF ETHICS & CONDUCT

CODE OF ETHICS & CONDUCT

Contents

Message from Leadership.....	3
INTRODUCTION.....	4
1. PURPOSE AND VALUES.....	4
2. APPLICABILITY OF THE CODE	4
3. VALIDITY AND UPDATE	4
ETHICS & CONDUCT	5
1. PURPOSE	5
2. CUSTOMERS AND USERS.....	5
3. WORK ENVIRONMENT	5
4. SUPPLIERS	5
5. COMPETITORS.....	6
6. MEANS OF COMMUNICATION: MEDIA AND PRESS	6
7. GOVERNMENTAL AUTHORITIES	6
8. COMMUNITY.....	6
USE OF MONKEY'S ASSETS AND RESOURCES	7
1. INTELLECTUAL PROPERTY	7
2. USE OF CORPORATE EQUIPMENT	7
3. BOOKS AND RECORDS.....	8
4. CONFLICTS OF INTEREST	8
5. GIFTS	8
INFORMATION SECURITY AND CONFIDENTIALITY	9
1. PROTECTION OF PERSONAL DATA.....	9
2. INFORMATION SECURITY	9
3. CONFIDENTIALITY.....	9
MANAGEMENT OF THIS CODE AND THE ETHICS CHANNEL	10
1. SANCTIONS.....	10
2. ETHICS CHANNEL.....	11
MISCELLANEOUS	11
ATTACHMENT I.....	12



Message from Leadership

The development of our business is based on building and maintaining relationships founded on legality, efficiency, transparency, and especially, on the trust we receive from our customers, partners, and Employees. Integrity and ethics are unquestionable ways to conduct our business.

Our mission is to relentlessly pursue excellence in business performance, through the provision of services that aim to bring together our customers, their suppliers, financial institutions, and partners to form a large network, within strict ethical, responsibility, agility, and efficiency standards that provide pride and satisfaction to our customers and Employees.

This Code of Ethics & Conduct is an essential part of Monkey's Integrity Program and gathers the main values, guidelines, principles and rules whose fulfillment is mandatory in the exercise of our professional activity. The rules described in this Code cover all of Monkey's daily activities and must be complied with and kept as a source of reference for everyone.

It is very important that you read and know the guidelines of this document. We are counting on you to ensure that it is always followed and performed.

Best Regards, []

INTRODUCTION

1. PURPOSE AND VALUES

Purpose

Monkey was created with a purpose: to improve the financial health of small and medium suppliers and expand the credit market in Brazil. For this purpose, Monkey offers a platform, through the licensing of its own software, which connects our customers, their suppliers and financial institutions interested in factoring any invoices or credit card sales receivables, through a digital negotiation platform, always in an ethical, transparent and trustworthy manner before all involved.

Values

Monkey's corporate values incorporate the conviction that the exercise of its activities and the expansion of its business should be based on **ethical** principles, shared by all our Employees. In the relentless pursuit of growth and customer satisfaction, Monkey operates with total **transparency** and **respect for applicable laws and regulations**.

In addition, we do not admit and reject any statement of prejudice related to origin, race, color, religion, social class, gender, condition, physical disability, profession, or any other form of discrimination.

The preparation of this Code represents the firm commitment of our entire team with Monkey's corporate values.

2. APPLICABILITY OF THE CODE

This Code applies to all those who have a professional relationship with Monkey Serviços de Tecnologia Ltda., its affiliates and subsidiaries (together, "Monkey"), whether of a corporate (shareholders, directors), employment relationship or contractual nature, including officers, managers, employees, third parties, representatives, suppliers, service providers, intermediaries, interns and young apprentices ("Employees"). All of them must adhere to this Code, either by signing the specific Joinder Agreement (**Attachment I**) or as provided for in the employment contract or contract of another nature.

In case of doubts, authorization or need for advice, contact the Compliance area by email compliance@monkey.exchange.

3. VALIDITY AND UPDATE

This Code becomes effective as of its publication and will remain in force for an indefinite term. This document was submitted to the Board of Directors and will be reviewed whenever it is necessary to update its content. The updated version of the Code will be available on Monkey's website.

ETHICS & CONDUCT

1. PURPOSE

This Chapter aims to establish the principles, concepts and values that guide Monkey's ethical standard of conduct in its internal operations, as well as its relationships with its various stakeholders, including shareholders, investors, customers, users, Employees and the general public.

2. CUSTOMERS AND USERS

Monkey's primary objective is the maximum satisfaction of its customers and platform users in relation to the products or services it offers. All interactions with customers and users must be based on respect for their rights, integrity and transparency, striving for courtesy and efficiency in customer service, the provision of clear and objective information and prompt responses.

3. WORK ENVIRONMENT

A fundamental aspect of Monkey's corporate culture is to maintain a harmonious and respectful work environment. It is essential to preserve this environment, stimulating team spirit, innovation and maximizing results. In addition, the quality of work relations is a significant competitive advantage that allows Monkey to select and keep the most outstanding professionals in each area. All those who hold leadership positions at Monkey should serve as an example of conduct for the others.

We ensure equal opportunities for professional development, recognizing the merits, competencies, characteristics and contributions of each person, regardless of race, gender, sexual orientation or any personal characteristic.

Internal communication among Monkey's units and areas should facilitate and promote cooperation, in addition to encouraging the participation and involvement of Employees in Monkey's business.

4. SUPPLIERS

Monkey, guided by the highest standards of conduct, honors its commitments to its suppliers, always seeking to establish clear, objective, efficient and appropriate contracts for the proper conduct of its business. Monkey will inform its suppliers about the conditions and criteria for competition and contracting, always on equal terms.

The choice of Monkey's suppliers should always be guided by technical, objective and reputational criteria, based exclusively on professional and business grounds and in Monkey's best interest.

Monkey values confidentiality in all its relationships. Also, in relation to suppliers, Employees should treat all information exchanged between the parties as confidential, regardless of any contractual provision in this regard. Employees should also observe not to disclose to suppliers' business or technology information that is not related to the contract and that is sensitive to Monkey.

5. COMPETITORS

Ethics and transparency in performance also apply to Monkey's relationship with its competitors, with whom Monkey establishes and maintains relationships of mutual urbanity, cordiality and respect. Comments or rumors that may impair the business or image of competitors, of which Monkey expects reciprocal and cordial treatment, will not be disclosed.

It is absolutely prohibited to disclose any relevant information or document of interest to Monkey to its competitors, except in exceptional cases, upon prior and express authorization from the Legal Department.

6. MEANS OF COMMUNICATION: MEDIA AND PRESS

The media is a relevant channel of information between Monkey and its various target audiences, as well as with the most diverse segments of society. Monkey is open to attending and providing information to the press, whenever possible and without legal, strategic, or ethical obstacles.

It is important to clarify that communications with the press or information in social media are carried out by the Executive Board and the area responsible for such. Employees who have not received specific authorization in this regard must refrain from making public comments on behalf of Monkey and may only provide information to third parties in general, reporters, interviewers or journalists if previously and expressly authorized by the Legal Department.

Employees must refrain from posting on any social media, such as social networking sites (Facebook, Instagram, LinkedIn and Twitter, among others) and blogs, comments and/or images that could compromise Monkey's image and must refrain from disclosing Monkey's commercial and business information that is not accessible to an external audience.

7. GOVERNMENTAL AUTHORITIES

In our actions and interactions, we always seek to cooperate with the other party, especially with the Governmental Authorities, when we consider that they act in the common interest and for the benefit of society. Based on this understanding, we seek to develop a good relationship with all governmental and regulatory agencies.

Any request, solicitation, or requirement from governmental authorities should be forwarded to the Legal Department, which will guide the form and means of attendance and response, so that appropriate measures can be taken, ensuring that all applicable requirements are met.

It is forbidden for anyone to offer or receive value, advantage, gift, information or anything similar to governmental agencies or officials in exchange for any service, information or document that depends on the authorization of an administrative authority for the direct or indirect benefit of Monkey.

8. COMMUNITY

Monkey works to provide fast and cheaper credit to large, small and medium-sized businesses. Its essence is to aggregate and connect companies and people through technology to improve their business, allowing the reduction of transaction costs and obtaining values in an ethical and transparent way. We do not tolerate actions in the market that violate human rights (such as slave labor, child labor) and we always seek to reduce our impact on the environment.

Monkey encourages its Employees and partners to ensure that the positive impact of their business is also reflected in their day-to-day routine conduct, which should also be guided by respect for the environment and ethics in human and personal relationships.

USE OF MONKEY'S ASSETS AND RESOURCES

1. INTELLECTUAL PROPERTY

The information, technologies, and intellectual property rights, including creative materials, strategies, plans, controls and other documents developed or requested and, in particular, the software used to offer its products and services and that are licensed to its customers, including all versions and updates, belong exclusively to Monkey.

Monkey's employees, partners and suppliers, unless otherwise provided for in a specific contractual instrument, will assign all property rights arising from copyrights to Monkey. All intellectual property will belong to Monkey after the end of the relationship with any employee, authorizing the improvement and maintenance of the title of such property.

No Employee may use Monkey's software, programs, applications, functionalities, technologies or any other asset protected by intellectual property rights to develop his or her own technology, nor share such information with third parties by any means, unless expressly authorized in writing.

2. USE OF CORPORATE EQUIPMENT

All equipment (notebooks, tablets, cell phones and similar) provided by Monkey to its Employees is the exclusive property of Monkey and must be used only for the purpose of performing the job or function for which they were hired. Monkey will ensure that each piece of equipment has access to the applications and software required for each function performed, such as software that records customer service. Monkey may monitor the use of the equipment and its content.

It is important to emphasize that Employees should not expect privacy over information exchanged or filed in corporate equipment, even if authorized to be used for personal purposes and with a password. Such messages and information may be monitored by Monkey, since it may be obligated by law or court decision to compensate any damages caused by the improper use of this instrument by its Employees.

Personal email is not allowed for contact on behalf of Monkey. Always use your corporate email address.

Employees are responsible for preserving Monkey's material assets, and for ensuring that no work materials and tools are wasted.

3. BOOKS AND RECORDS

Employees must ensure that all financial information and records are complete, accurate, timely and understandable, as they are of utmost relevance for decision-making by officers and shareholders. All books, records, and accounts must reflect transactions and events in accordance with accounting principles, methodologies, and internal control framework. These guidelines apply not only to Employees responsible for finance or accounting, but to all Employees in the exercise of their respective functions and responsibilities.

4. CONFLICTS OF INTEREST

Everyone must act in Monkey's best interests and not perform any action or omission that could cause conflict between Monkey's business and their personal interests.

The use of your position to enjoy illicit or immoral benefits or to obtain, in prejudice to Monkey or a subsidiary, any kind of personal favor, inside or outside Monkey, will not be tolerated. Likewise, the use of the position for the improper use or obtaining of confidential information that the position provides will not be tolerated. In addition, decisions that affect the professional career of subordinates based solely on their personal relationship with their superiors will not be accepted, and all decisions that may have such effects must be expressly motivated by essentially meritocratic criteria.

Certain situations more easily give rise to the perception of the existence of a conflict of interest, but it is natural that doubts arise when facing concrete situations daily. For this reason, each Employee must individually evaluate his or her attitudes and decision-making in order to avoid situations that could place him or her in a conflict-of-interest situation. The prevention of conflict situations, even hypothetical or potential ones, is a duty for each Agent. In any case of doubt, even about a potential situation or the mere existence of a conflict, contact your direct superior or Compliance.

5. GIFTS

Receiving and offering gifts and entertainment are accepted, if they are based on a business purpose and on strengthening ties between companies and customers.

As a rule, no Employee should request, offer, or accept gifts and invitations, regardless of the time or reason that have the objective of influencing or rewarding business decisions, exchange of favors, or undue advantages. In order for the receiving or offering to create doubtful situations as to its legitimacy, we have adopted some guidelines, as follows: (i) offering or receiving gifts and entertainment must always be communicated to Compliance, regardless of the value; (ii) in cases of gifts with the company's logo or name, they can be accepted with no value limit and when there is no such identification, they must have a maximum value of Five Hundred Brazilian Reals (R\$ 500.00).

Specific guidelines are provided in the company's own policy. In case of doubts, Compliance may be consulted.

INFORMATION SECURITY AND CONFIDENTIALITY

1. PROTECTION OF PERSONAL DATA

Monkey complies with the Law No. 13,709/2018 (General Data Protection Law - LGPD) and ensures its effective compliance in the protection of personal data, the fundamental rights of privacy and freedom and the free and independent development of the personality of individuals.

All employees of Monkey shall comply with the applicable legislation in the treatment of personal data. Only personal data strictly necessary for the performance of the activities of the respective business area will be collected and such data will be accessed and/or processed according to its strict purpose, regardless of whether it is in physical or virtual media, in compliance with the LGPD.

All employees have a duty to notify immediately, without undue delay, of any personal data breach or attempted breach of which they become aware, and to cooperate in the investigation and mitigation of personal data breach incidents.

For matters concerning personal data breaches or attempted personal data breaches, employees should contact Monkey's Data Protection Officer (DPO) either in person or via privacidade@monkey.exchange.

2. INFORMATION SECURITY

We adopt adequate information security measures to preserve the confidentiality, availability and integrity of data, whether personal or not, of our customers, platform users, suppliers and employees.

The passwords to access the systems and resources offered by Monkey are nontransferable and strictly for personal use. The disclosure of access passwords to the systems and resources offered by Monkey to other employees or third parties is prohibited.

3. CONFIDENTIALITY

All Monkey's privileged, strategic, and confidential information, or information received on behalf of Monkey, about employees, customers, users, processes, the market, programs, technologies, prospects and results, should be kept strictly confidential.

Everyone should treat as confidential matters related to Monkey's activities that are unknown to the market and the public, such as user data, internal events, and market information, financial, economic, legal, operational, or contractual issues, strategic planning.

Everyone who has access to sensitive, critical and privileged client information, in particular information protected by banking secrecy and information relating to business strategy, is responsible for protecting this information in accordance with the company's policies and legislation in force.

The obligation of confidentiality goes beyond the professional relationship, being enforceable regardless of any specific contractual provision to this effect and remaining valid after its termination.

The unauthorized use of confidential information may constitute illicit use of privileged information, especially if associated with business conducted with customers, competitors and suppliers. The use of privileged information, including for personal purposes, is prohibited at Monkey and is subject to the penalties provided by specific laws, also allowing Monkey to use all applicable legal means to seek compensation for damages caused by illegal and illegitimate practices.

Compliance must be consulted if the Employee is in doubt about any disclosure he or she intends to make and believes there is any confidential topic involved.

MANAGEMENT OF THIS CODE AND THE ETHICS CHANNEL

The management of this Code is the responsibility of the Ethics Committee, whose function, together with the Compliance Officer, is to ensure the fulfillment of the rules set forth herein and the good performance of Monkey's Integrity Program.

The activities of Monkey's Ethics and Compliance Committee are (i) communicate partners and shareholders about the progress of the Integrity Program; (ii) promptly assist all Monkey Employees; (iii) act on possible conducts verified in violation to this Code, (iv) review this Code from time to time; (v) promote the wide dissemination of this Code to all Employees and third parties; (vi) ensure secrecy, confidentiality, anonymity and impartiality in the investigation of reports and accusations; (vii) carry out investigations, when necessary; (viii) request, whenever necessary, the support of internal or external auditors or other professional advisors, for the analysis of its issues.

Periodic training will be held on the need to comply with the provisions of this Code.

1. SANCTIONS

Failure to comply with the standards and provisions set forth in this Code and other Monkey policies is subject to the application of disciplinary measures. In the case of Employees, verbal and/or written warnings, suspension or dismissal, among others, may be applied. In the case of suppliers and third parties, the penalties provided by law and by contract may be imposed, without prejudice to Monkey's right to claim compensation for damages caused.

The sanctions resulting from non-compliance with the principles established in this Code will be defined by the Ethics Committee, after conducting the necessary investigation, in a confidential and impartial manner.

2. ETHICS CHANNEL

Suspected violations of this Code should always be reported to the SafeSpace Ethics Channel (<https://my.safe.space/company/monkey-exchange>)

All employees must immediately report any violation of this Code, and failure to report is also considered a breach of the standards set forth in the Code and, therefore, subject to applicable sanctions.

Any and all reports will be treated anonymously and confidentially, and any retaliation aimed at the employee or third party making a report is strictly forbidden. The employee or third party acting in good faith that makes a report, even if it is not considered well-founded, cannot suffer any kind of reprimand.

MISCELLANEOUS

Any doubts about interpretation or matters not expressly dealt with herein should be submitted to the Ethics Committee. Issues addressed more succinctly in this Code and others that may not be addressed, do not reduce the importance and application of the general rules of good conduct and socially accepted ethical policies. Any waiver by Monkey shall not be deemed as a renewal or permanent disregard of the rule.

In the case of Joint Ventures, Mergers and Acquisitions or Consortia, Monkey shall take all necessary steps to verify risks related to corrupt or fraudulent practices, including performing integrity due diligence.

ATTACHMENT I

DEED OF UNDERTAKING AND ADHERENCE TO THE CODE OF ETHICS & CONDUCT

I understand that Monkey's reputation, integrity, and ethics are the responsibility of each one of us, and that this Code of Ethics & Conduct constitutes fundamental guidance for our daily practices, in accordance with Monkey's corporate conduct, reflecting a commitment to professionalism and transparency.

I fully undertake to comply with it in all of my actions at work. And I acknowledge that I have received a copy of Monkey's Code of Ethics & Conduct and that I have had the opportunity to ask questions about the guidelines described therein.

I understand that it is my responsibility to abide by the guidelines set forth in this Code.

I also understand that the Code is designed to serve as a guide to Monkey's guidelines for conducting business.

Name: _____

Enrollment: _____

Signature: _____

Place and date: _____, ____/____/____.