

CODE OF CONDUCT AND ETHICS

Your integrity is our greatest asset.

INTRODUCTION

Integrity is the basis of **Amplitude Latin America S.A.'s operations** and, in order to maintain our good reputation, everyone who can act on behalf of Amplitude must strictly follow the Code of Conduct and Ethics and other company policies, complementary to the applicable legislation.

The dissemination of our ethical values of **excellence, honesty and efficiency** is essential for us to sustain our competitive advantage in the market and avoid future problems. Therefore, internal policies must be known and respected by all directors, coordinators and employees or partners, a category that involves suppliers, service providers, distributors, commercial representatives, agents, consultants or anyone who supports the operation of Amplitude or can be related to its name.

As an employee or partner of Amplitude, you work as a cell and need to know, understand and **act in accordance** with the company's rules. Our internal rules shall prevail over applicable laws if they are stricter than these and, if you have any questions, please contact the Compliance Department.

Illegal practices or practices that do not comply with our rules are not tolerated and must be reported through the Compliance Channel. Retaliation or threats to those who report disrespect for the rules are expressly prohibited and will not be admitted under any circumstances.

Amplitude's good reputation is sustained by each one of us.

Bruno Próspero
Chief Executive Officer

João Teixeira
Chief Financial Officer

Luiz Souza
Compliance Officer

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1. CULTURE

Compliance

All employees must follow the relevant laws and internal rules of Amplitude, acting ethically, honestly, efficiently, kindly, respectfully, care, cooperation, dialogue, equality and dignity, and discrimination, harassment or any other type of unwanted or inappropriate conduct is prohibited.

Working environment

In addition to observing labor laws, Amplitude seeks to ensure a healthy work environment for its employees, also prohibiting the use of intimidating or threatening language.

Decision-making

Decisions involving people are guided by objective criteria of technical adequacy, never by other issues (such as nationality, race, color, religion, gender, age, marital status, citizenship, etc.). Actions that benefit other employees must be approved by their superiors, as no employee is authorized to hire on behalf of Amplitude without specific authorization from the Board of Directors.

Public demonstrations

Any and all manifestations on behalf of Amplitude can only be made by its Directors, whether to the press, investors, brokers, banks, financial analysts or any other person outside the company.

Beware of privacy

All personal data and other company records are kept confidential – this involves commercial, organizational, financial, industrial information, among others. If you have contact with internal information, consider it confidential and never share it. In specific cases of court order, law or official request from a government authority, the disclosure of data may occur after authorization from the Board of Directors and the DPO (*Data Protection Officer*).

Commercial team

The members of the commercial team need to be cautious in dealing with customers and business partners. This care especially involves the need for confidentiality of the information exchanged: disclosing any type of commercial condition, value or volume of sales practiced may characterize a violation of Amplitude's rules and the employee involved will be subject to the appropriate measures. [Our PRICING AND DISCOUNTS POLICY should be considered.](#)

Managers and Coordinators

As leaders, managers and coordinators play a key role in complying with company policies and must ensure that all employees under their guidance know and apply Amplitude's rules.

Suppliers and other partners

We seek business partners who share our values and are willing to follow them in conducting common projects. Our business decisions are based on merit, transparency and honesty. In addition, all contracts made contain confidentiality, [anti-bribery](#), anti-corruption clauses and other requirements imposed through Compliance for hiring.



2. CONSULTING WITH HEALTH PROFESSIONALS

Amplitude hires health professionals to develop, improve and promote products. The hiring must be motivated by legitimate business need and any attempt to induce a health professional in making his decisions should be ruled out.

Contracts for the engagement of health professionals are aimed at the development and/or transfer of intellectual property, marketing, presentations at company-sponsored trainings and other related services. The selection, hiring and supervision of professional health consultants must follow our CONSULTANT HIRING POLICY.

3. CONFLICTS OF INTEREST

A conflict of interest is characterized when there is a disagreement between the personal interest of an employee and the best interest of Amplitude. This can occur in decision-making situations with the possibility of benefiting oneself, or relatives, friends, partners or other people.

The existence of a conflict of interest does not include a violation of the Code of Conduct, but its omission does. Even if you are committed to acting ethically, if you identify a possible conflict of interest, it is your duty to report it to the Compliance Officer. Company rules will only be violated if an identified conflict of interest is omitted.

EXAMPLES OF CONFLICTS OF INTEREST

- Seeking personal benefit or benefit for family/friends/partners in business dealings
- Falsifying or destroying company documents to gain an advantage
- Supporting a competing commercial activity
- Making business decisions based on personal interests
- Providing advantages to influence commercial conduct
- Engaging in business with companies where family/friends/partners have an interest
- Having a familial relationship with another employee or Amplitude partner

4. COMPETITION

In order for competition to be fair and for the company's healthy growth to be maintained, it is necessary to observe the applicable legislation and the company's values: **the mere appearance of conspiracy can create significant risk to Amplitude.**

Any form of action in disagreement with laws or internal rules can constitute unfair competition and generate serious sanctions for the company and those involved. As part of Amplitude, it is your duty to:

- ✓ Not to share or allow third parties access to Amplitude's business information, such as its revenue, sales volume or price, employee data, internal organization, or any other non-public company information;
- ✓ Not encourage the disclosure of information about competitors through their personal relationships;
- ✓ Never discuss boycotts of other competitors, customers or suppliers;
- ✓ Not discussing pricing or commercial information with competitors or other companies;
- ✓ Do not enter into agreements with competitors to divide markets, areas, types of products, etc.

The above-mentioned rules are also applicable in relation to trade associations, congresses, meetings, seminars or other events and organizations. [And consider our PRICE AND DISCOUNT POLICY.](#)

If there is doubt about the risk of a certain situation, report it to Compliance.

5. ADVERTISING AND MARKETING

When dealing with our products, we act in accordance with the Consumer Protection Code (Law No. 8,078/1990) and our [MARKETING POLICY](#). Amplitude's market strategies and information used for advertising are solid and based on real data.

All those responsible for the dissemination of Amplitude's products maintain the highest levels of transparency, attentive to market needs and in order to maintain solid and lasting relationships with our customers.

6. ANTI-BRIBERY POLICY

Amplitude does not tolerate acts of corruption in any of its forms and emphasizes the importance of complying with the Brazilian Anti-Corruption Law (Law No. 12,846/2013), in addition to our [ANTI-BRIBERY POLICY](#).

Although corruption involves harmful acts against the public administration, the practice of private corruption by our employees is also strictly prohibited (e.g., offering value to obtain commercial advantages). As part of Amplitude, you must watch for and report the possibility of corruption, fraud, or bribery.

7. BUSINESS COURTESIES

Amplitude strives to cultivate lasting business relationships and the offering of business courtesies should be conditioned to this, occurring in a timely manner, with caution, without exaggeration and with a legitimate business purpose.

Any attempt to influence behavior or receive undue advantages by offering these courtesies, such as by delivering gifts, high-value gifts or paying for accommodation or meals to third parties, must be avoided.

It is essential that all Amplitude employees know our GIFTS AND HOSPITALITY POLICY.

8. TRAVEL

Travel or expenses of employees or third parties may be covered by Amplitude when involved in the promotion, demonstration of products or fulfillment of contracts, as in the case of consultancies. Expenses must be reasonable according to market standards, documented and incurred only with the consent of the Board of Directors.

The other necessary guidelines are available in our TRAVEL POLICY, EXPENSES AND REIMBURSEMENTS POLICY and CONSULTANT HIRING POLICY.

9. BIDS

Bids are the means for contracting with direct and indirect public administration bodies, such as special funds, autarchies, foundations and public companies, mixed-capital companies or other entities controlled by the Union, States, Federal District and Municipalities.

In addition to the relevant laws such as the Bidding Law (Law No. 8,666/1993), as an employee or business partner of Amplitude you must know the BIDDING PARTICIPATION POLICY, which brings care to negotiations with the Government and emphasizes the importance of an ethical posture by anyone who may be related to the operation of the company.

Although Amplitude does not participate directly in bids, if there is any suspicion in relation to colleagues, public officials or companies in the field of bidding fraud, it is its duty to inform Compliance.

10. INDUSTRIAL PROPERTY RIGHTS

Amplitude respects the rights related to industrial property and follows the provisions of the Industrial Property Law (Law No. 9,279/1996). In addition to respecting these rights of third parties, our employees and partners must keep confidential all information related to Amplitude's industrial property rights.

11. INFORMATION SYSTEMS

The information systems, corporate *e-mail*, *hardware*, *software*, services, subscriptions, applications and other technologies provided by Amplitude are the property of the company and can be monitored to verify compliance with its internal rules.

Our systems are limited to Amplitude's business purposes and need to be used appropriately, protected from damage, alteration, theft, fraud and unauthorized third party access, respecting the company's values and rules.

Never share your usernames, passwords, or other access keys to company systems.

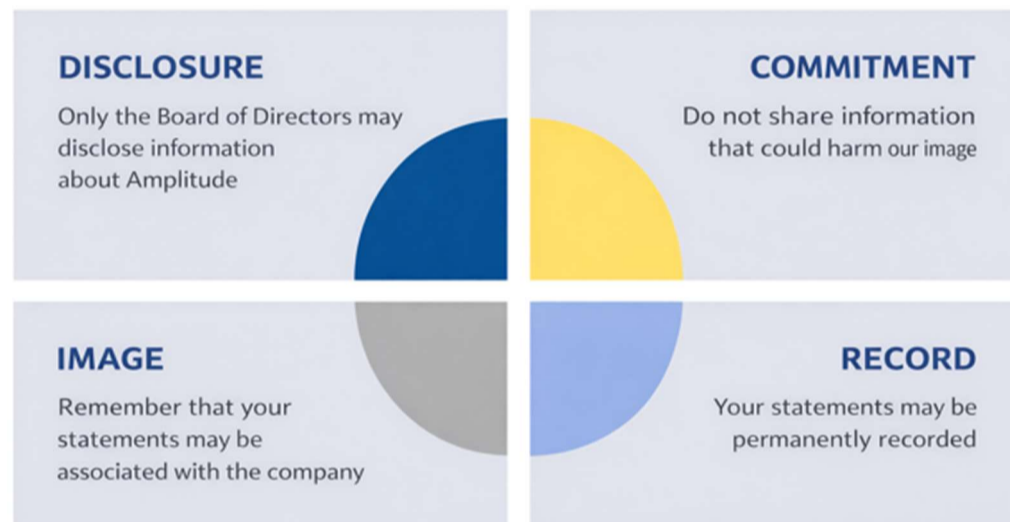
Never use these means to solicit undue advantages, practice harassment, discrimination or send or receive inappropriate material or to practice any other conduct in disagreement with the company's values. The use of corporate *e-mail* and all other Amplitude systems is an exclusive prerogative of each employee and may be inspected by the responsible departments.

The responsibility for information generated or extracted from the system will lie with the electronic user who made this access, so never share your access keys with others. The sharing of access keys by an employee may lead to disciplinary sanctions.

Under the terms of the General Law for the Protection of Personal Data (Law No. 13,709/2018) and our PERSONAL DATA PROCESSING POLICY, we protect the confidentiality of data that is collected or processed by us, except in relation to the provisions of the law itself.

12. DISCLOSURE OF INFORMATION

It is common for our employees to have access to non-public information about the company, such as the commercialization of new products, changes in management, important sales, etc. However, it is everyone's duty to keep all information about Amplitude and its employees confidential.



Only the Board of Directors may disclose information to the press. If you are not an Amplitude Director, if you receive any contact or request for information, please immediately forward it to Compliance and do not make any disclosure.

Remember that when you interact with colleagues, clients, or anyone else, you will be representing Amplitude. Do not spread information that may affect our image or that is untrue and, when conducting communications, act **professionally**.

Be very cautious when speaking up, including in person and on your social media. We expect our employees to act ethically in all spheres, as their profile can be seen not only by co-workers, but also by customers, and it is very important to demonstrate their coherence with Amplitude's ethical values.

Communications may be permanently recorded, and the disclosure of sensitive, confidential, or inappropriate data may affect our reputation negatively and permanently.

13. DONATIONS

Amplitude's social responsibility goes beyond its concern for the well-being of its employees. For this reason, we make donations based on a legitimate purpose of contributing to society. For more information on the topic, check our [DONATION POLICY](#).

14. USE OF ASSETS

Amplitude's set of assets should only be used to achieve the company's purposes and includes the inventory of products, computers, equipment, facilities and intangible assets such as information, resources, intellectual property, commercial opportunities and even the working time of each employee.

Everyone has the duty to collaborate and protect the use of assets, preventing waste, lack of caution or use for personal purposes, except in situations expressly authorized or provided for in specific policies.

15. COMPLIANCE CHANNEL

Amplitude has a [COMPLIANCE POLICY](#) that establishes its commitment to the culture of integrity, ethics, legal compliance, and anti-bribery, ensuring that all operations are in line with the laws, standards, applicable regulations and other internal policies that are part of this Policy and the Code of Conduct and Ethics.

Prior consultations and reports of irregularities to the Compliance Sector can avoid violations of laws, rules and other future problems.

Access to the compliance and whistleblowing channel is available on the Amplitude Latam website, through the main menu and the 'Compliance' button.

ACCESS TO THE COMPLIANCE CHANNEL:

<https://amplitude-latam.com/#>

WHISTLEBLOWING CHANNEL:

<https://amplitudelatam.becompliance.com/canal-etica/canal-denuncias>

The actions of all employees involving Amplitude must comply with applicable laws and our internal policies. The practice of an act contrary to such provisions will not be tolerated under the allegation of ignorance of its content.

Therefore, we keep this channel open and encourage contact whenever necessary. All information is processed with strict confidentiality and under no circumstances may an employee suffer retaliation for manifestation, complaint or denunciation made.

COMPLIANCE CHANNEL

QUESTIONS & FEEDBACK

Ask questions and provide feedback or suggestions on our policies



ALERTS

Forward requests for information received from the market or media

AUTHORIZATIONS

Request authorization to enter into commercial agreements

REPORTS

Report potential conflicts of interest, illegal acts, or violations of our policies

16. OCCURRENCES

If you are aware of suspicious activity, report it through the Compliance Channel.

If non-compliance with the law or our internal policies is proven, the appropriate measures will be taken through disciplinary proceedings (including dismissal for cause, suspension or warning) [as defined in PSI 32 – CHANNEL FOR COMPLAINTS AND INTERNAL INVESTIGATIONS](#) and without prejudice to the application of legal measures by the competent authorities.

17. PREVENTIVE POLICIES

In its performance related to Amplitude, all other preventive policies made available must also be observed.