

# Hotmart Company Code of Ethics and Conduct

2021

# Message from the Founders

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Ethics, transparency, best practices, and care when dealing with others are the building blocks of Hotmart. Since our beginning, we've insisted that these principles guide our decision-making. Hotmart Company was born with this culture and has grown exponentially to a team of thousands of people working in different countries. Additionally, new companies have been added to the group. This has expanded our responsibilities with customers, shareholders, partners, and everyone involved with the company.

Today, Hotmart Company is one of the largest enterprises in the world when it comes to the creator economy.

With all this fast growth also comes new challenges. In order to continue operating within the compliance standards, best practices, and good governance standards of all countries in which we operate, we have updated, revised, and made available the Hotmart Company Code of Ethics and Conduct.

The purpose of this new version of the Code of Ethics and Conduct is to guide how we work and interact with each other in addition to our customers, suppliers, partners, shareholders, and investors. For this reason, it must be observed and embodied by everyone at Hotmart Company, regardless of country or enterprise within the company.

It is essential that everyone understands and follows the rules, standards, and guidelines established here. This way, we can continue to build an ethical and respectful environment for all. This is how we will forge this path together in pursuit of fulfilling our mission of helping even more people live their passions.

**The responsibility to do the right thing lies with each one of us.**

**We are counting on you!**

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# Introduction

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It is only natural for certain situations to arise in our daily routine, in which it's necessary to make difficult decisions. Although Hotmart Company prioritizes and encourages Employee autonomy, we know that certain decisions can pose challenges from the standpoint of ethics and integrity. Therefore, it is critical that we have guidelines to direct our conduct so that they are compatible with Hotmart Company principles and values.

This is the purpose of this Code. It gathers the ethical principles and values that should guide the way we all behave and interact with each other and with our partners, customers, suppliers, and service providers regardless of where we work, our hierarchical level, or area of activity.

These expectations extend to our interns, trainees, apprentices and also to our partners, suppliers, and customers in general. In summary, this Code applies to every person working with, for or on behalf of any Hotmart Company enterprise. This includes Hotmart Company and each of our subsidiaries, individually or collectively.

It's important to point out that the Code was not conceived as a manual, nor does it have solutions for all situations that may arise during our work routine. It represents a parameter and point of reference of expected behaviors, not an exhaustive list of rules. It is also a living document and may be modified or replaced at any time by Hotmart Company.

In addition to this Code, you also should take into account Hotmart Company current policies, where specific rules may be applied in conformity with the issue or necessity.

If you have questions about the application of this Code, or about how best to act in a given circumstance, talk to your leader or contact Hotmart Company Legal/Compliance Department.

To facilitate the reading of this Code, we provide a Glossary at the end, which lists the meaning of the expressions beginning with capital letters.

**1. Doing the right thing is the responsibility of each one of us**

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# Expected Conduct

Hotmart Company expects all Employees to adhere to the highest standards of integrity and ethics in their dealings within Hotmart Company and with Third Parties on behalf of Hotmart Company.

At the same time, Hotmart Company's global and local leaders have the additional responsibility of promoting ethical conduct and disseminating this Code to their teams, answering questions and correctly forwarding specific demands so that they can be resolved.

In that sense, we are expected to:

## **Above all, respect the law**

Among other things, this means we must act in strict compliance with all local, national and international laws and regulations applicable to Hotmart Company, notably (but not limited to) the laws that fight money laundering, fraud, bribery and corruption that apply to Hotmart Company operations in the countries where it operates.

## **Respect Hotmart Company's rules and policies**

Compliance with laws is essential. However, ethics and compliance at Hotmart Company is more than just technical compliance with the law. Our mission and our success have been founded upon our core beliefs and putting them into action. We expect that you will, at all times, respect the rule laid out in this Code as well as the rules and policies of the business when representing Hotmart Company.

## **Respect one another**

Respect in your relationships builds feelings of trust, safety, and wellbeing. Hotmart Company expects you to be considerate of others, both in your words and in your actions. Respecting others is not making a decision about them based on their beliefs or practices.

# **2. Our commitment to people**

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# Harassment, Bias, and Discrimination

Hotmart Company is committed to promoting and ensuring a respectful, healthy, and safe Work Environment where everyone feels comfortable expressing their opinions.

Hotmart Company does not tolerate any form of Harassment, Bias, or Discrimination in the relationship between Employees, regardless of their hierarchical levels, including in relation to Third Parties.

The notions of Harassment and Discrimination adopted by Hotmart Company are contemporary and, therefore, broad and open-ended, to cover any unwelcome behavior that is contrary to the dignity of the human person, or creates an intimidating, hostile, degrading, humiliating, or destabilizing environment, in violation of the expected behaviors described in this Code.

Hotmart Company further understands that these concepts are subject to constant evolution.



# Diversity and Inclusion

Hotmart Company is committed to promoting an environment of respect and open dialogue, in which people can be themselves and are free to give opinions.

We want our Work Environment to be diverse, ensuring Inclusion of all Employees and Third Parties, regardless of each personal characteristics.

We value collaborative work, respect for differences, and encourage Diversity and constructive dialogue. To ensure such an environment, we must:

## **A. Promote equal employment opportunities**

Our employment-related processes including recruitment, hiring, terminations, promotions, compensation, performance evaluations and training shall always be unbiased, accessible and committed to Hotmart Company's culture and each person's deliverables.

## **B. Zero tolerance for disrespect for Diversity**

Hotmart Company does not tolerate any type of disrespect for a person or group of people based on their characteristics such as race or ethnicity, gender, gender expression and identity, language, culture, religion, sexual orientation, national or social origin, economic status, birthplace, marital status, age, disabilities, health conditions, political opinion or any other opinion, among other differences.

# **3. Our commitment to the company's assets**

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# Use of Hotmart Company Property and Resources

Hotmart Company may conduct periodic inspections regarding the use of its assets and resources without the need for any prior authorization.

When using Hotmart Company assets, the following must be observed:

## **Protection of assets**

Whenever it is necessary to use Hotmart Company equipment outside of its facilities, such as in cases of external events, Employees shall communicate it to the Facilities team and comply with provisions of the Cyber and Information Security Policy.

## **Respect for Hotmart Company assets**

You may not use or take possession of Hotmart Company items for personal use, such as equipment, electronic devices, office supplies, furniture or fixtures, among others, or use Hotmart Company assets or resources for personal financial gain by virtue of your position. It is also forbidden to use Hotmart Company equipment and resources to engage in illegal or unethical activities, such as browsing pornography or gambling websites, or any other practices related to or with content that jeopardizes the performance of our activities and Hotmart Company interests.

## **External use**

Whenever it is necessary to use Hotmart Company equipment outside of the company's offices (e.g., for external events), you must notify the Facilities team and comply with the provisions set forth in the Company's Cyber and Information Security Policy.

# Respect for Intellectual Property Rights

Considering Hotmart Company's activity, the pursuit for a marketplace free of acts that violate, or may violate, intellectual property rights, is essential to the creation of a strong digital business environment, allowing more people to create and distribute digital content safely.

Therefore, Employees cannot:

**A.**

Access, encourage or facilitate access, for themselves or others, to content or products, whether physical or digital, that infringes Hotmart Company's or a Third Party's intellectual property rights; or

**B.**

Keep or use any Materials and other information, whether digital or physical, belonging to Hotmart Company or Third Parties, legally obtained in the course of professional duties and work activity, for purposes other than professionally related and linked to Hotmart Company.

# Obligation to Comply with our Gift, Hospitality, and Entertainment Policy

We know that it is part of the corporate culture for Third Parties to offer gifts, invitations, meals, entertainment, and other honors to our Employees.

However, the acceptance of these items must meet some requirements. This is because the payment of hospitality expenses and gifts may be a disguised form of granting undue advantage, with the purpose of obtaining improper advantage or influencing the decision-making process.

National and international anti-corruption rules have very strict standards regarding this issue. If you do offer or receive gifts, business meals, entertainment, or hospitality, please ensure that it is in an appropriate and proportionate manner. Always protect our reputation and make your decisions based on professional judgment.

For this reason, it is extremely important that you read and understand Hotmart Company Gift, Hospitality and Entertainment Policy.

If you still have questions about whether you should accept a particular gift, hospitality, or entertainment opportunity, please consult the Compliance Department.

# Fraud

Fraud is any dishonest act, committed by one or more people, to obtain anything of value or gain an improper advantage. These acts can involve money, goods, products, or information, but they can also be intangible advantages such as maintaining one's job. In simpler terms, committing fraud is intentionally acting dishonestly to benefit from this act.

Hotmart Company does not tolerate acts of fraud and it is up to each one of us to look after the company's best interests and be careful to avoid these dishonest acts, as this can have significant financial and reputational impacts on our company.

# Money Laundering

Money laundering generally means using legitimate businesses or business activities to conceal the nature, origin, location, movement, or properties from the proceeds of crime. In other words, money laundering aims to incorporate into the formal economy resources that originate from crimes such as drug trafficking, corruption, or smuggling, generating the impression that the money came from a lawful source.

Hotmart Company is committed to doing business with integrity and legal duty to avoid using our platform to carry out money laundering and terrorist financing, which is why the customer identification process is so important. We do not want our business to be associated with money laundering, terrorist financing, or other criminal activities carried out by third parties.

# **4. Our commitments to transparency and accuracy**

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# Responsibility for Books and Records

All Hotmart Company books and records must portray the course of our operations in a transparent and accurate manner. We must ensure that business and financial records:

1. Are supported by the respective underlying documentation and evidence.
2. Contain no deviations or omission.
3. Comply with applicable laws and generally accepted accounting and financial principles.
4. Are handled in such a manner as to avoid any violation of the financial system of any jurisdiction in which Hotmart Company operates.

# Obligation to Collaborate

All Employees must be aware of the need to keep administrative records, work papers, and corporate documents for the purposes of external or internal audits and/or investigations, internal risk assessments, compliance reviews, or inquiries of any nature.

**No information shall be omitted or fraudulently or inappropriately recorded, so that audits can truly reflect the reality of Hotmart Company operations.**

# Protection of Confidential Information

Anyone who has access to Confidential Information about Hotmart Company or Third Parties are prohibited from disclosing it in any way, whether to competitors, the market, to co-workers, family members, or close friends, in an informal manner or in everyday situations, inside or outside of the Hotmart Company Work Environment.

For Hotmart Company, the information about its business and its customers and dealings must be protected with the necessary care and best privacy and security efforts and should be treated with respect, secrecy, confidentiality, and discretion.

So, in addition to the observation to Hotmart Company internal policies, we should also:

- A.** Follow Hotmart Company recommendations about information security, in particular, regarding the use of strong passwords, secure connections, and additional forms of digital and online protection, asking for help whenever in doubt on how to proceed.
- B.** Refrain from discussing Hotmart Company or Third Party's Confidential Information in public spaces or where the information can be overheard by someone who would not have received the information otherwise, whether those people are Employees or not.
- C.** Avoid taking pictures or recording videos that show physical or digital files that contain information from Hotmart Company or Third Parties.

# Protection of Confidential Information

**D.** Use the communication tools provided by Hotmart Company to talk about all professional and business topics, and refrain from exchanging sensitive information via unofficial and unapproved Hotmart Company communication tools, such as WhatsApp, Telegram or Signal.

**E.** Access data, such as tokens, logins and passwords belong exclusively to Hotmart Company and permissions for use by each Employee have been provided on an individual and non-transferable basis. Under no circumstances may you share or allow the use of such access by anyone but yourself.

## Insider trading

Insider Trading occurs when someone, in possession of Materials and Confidential Information of a company, which can have a substantial impact on the decision for an investment, purchases or sells securities of that company.

**If you become aware of insider information involving Hotmart Company, you cannot not use that information to buy or sell a security and shall not advise any other person to buy or sell a security based on that information.**

# Processing Personal Data

Hotmart Company values the fair, transparent and legal processing of personal data. In strict compliance with the data protection laws as well as best practices, Hotmart Company adopts a set security measures to guarantee the protection of personal data against

- a)** unauthorized access;
- b)** accidental or unlawful situations of destruction, loss, alteration, or disclosure of personal data;
- c)** any form of inappropriate or unlawful processing of personal data.

In that sense, when, by reason of your activities, you use Hotmart Company systems or tools that allow access to personal data, it is necessary to act in a cautious manner and limit the processing of such personal data to the purpose of the task being performed, always observing the duty of secrecy and the applicable internal policies.

The obligation to protect personal data is also extended to Third Parties. To comply with our policies and the law, Third Parties must be submitted to a strict approval control and enter into a written contract with Hotmart Company.

For more information on how to approve Third Parties contracts, please review our [Contracts Policy](#).

# 5. Conflict of interest

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# Identifying a Conflict of Interest

Each of us has a responsibility to make decisions for the benefit of our company, without being influenced by personal considerations. In cases of conflicting interests, the Employee involved in a decision-making process, who should be able to judge a given situation in an unbiased manner, would have this ability compromised by having the power to influence the outcome of that decision in favor of an undue or illicit gain for themselves or others.

**Whenever a conflict of interest arises, you must refrain from representing Hotmart Company in the matter at hand, reporting the fact immediately to the compliance officer and your leader, so you can talk things over together and find the best solution.**

# Best Practices

To avoid situations of conflict of interest that may cast doubt on your or Hotmart Company's integrity, never let conflicts of interest interfere with your business decisions and never take personal advantage of an opportunity that belongs to Hotmart Company.

We should avoid:

## A. Employees as users of the services

To avoid conflict of interest, at Hotmart Company, Employees need specific authorization to become Creators, Cocreators, Affiliates, collaborators, or related Third Parties as defined in the Hotmart Company Terms of Use.

Likewise, it is expected that you immediately and spontaneously report to the Compliance Manager and Commercial Department if you become aware that any relative or close friend (a) is a Creator, Cocreator, Affiliate; or (b) is a member of digital content companies that are Hotmart Company Creators, Cocreators, Affiliates.

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## B. Best practices in hiring and selection processes

Any Employee who has knowledge that a relative is a candidate for a position at Hotmart Company, whether recommended by the Employee or not, must inform the fact to the recruitment team before the end of the selection process.

This Code refers to relationships such as father, mother, siblings, children, spouse or partner, or other people with whom the Employee has an emotional bond, shares a residence, or has a relationship of financial dependence. Recruiters who are related or friends of one of the candidates cannot participate directly in the selection process of these candidates.



# Best Practices

## **C. Best practices in relationships with Third Parties**

At Hotmart Company we consider it unlawful conduct to ask for or receive, for you or for a relative or close friend, any type of incentive or benefits of any kind from a Third Party, for their selection or promotion of their products or services, that is not for the benefit of Hotmart Company.

Hiring and interactions made by and on behalf of Hotmart Company must be done according to Hotmart Company's best interests and only with approved suppliers and formally through the appropriate channels, according to Hotmart Company Purchase Policy.

Employees may refer suppliers to Hotmart Company, but if a conflict of interest is identified, the Employee must abstain from any business or commercial decision related to that Third Party. In those cases, their immediate leader shall claim the responsibility for the related decisions.

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## **D. Best practices in Employees' relationships with each other**

Hotmart Company allows romantic relationships between Employees, provided there is no level of subordination between them or that, directly or indirectly, one cannot influence the professional activities, evaluation, or goals of the other.

In such cases, the situation must be informed to the Talents Department and Compliance Manager, which will analyze the situation and offer a recommendation for the solution of the conflict.

# 6. Our commitment to society

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# Donations

## **Political donations**

Hotmart Company and its representatives, in the course of their professional duties, may not make donations of a political nature to any public authority, political party or political candidate and none of Hotmart Company resources, assets, services or facilities may be made available to Public Agents, PEPs, political parties or political action committees.

**In addition, Hotmart Company legal representatives and senior leadership should not make donations or contributions to political candidates and parties in a way that the donation or contribution could be tied to Hotmart Company or could harm or affect Hotmart Company image.**

## **Donations to philanthropic and educational institutions**

Donations to philanthropic or educational institutions, as well as donations intended for the promotion of sports activities or sponsorships to any type of activity, shall comply with the provisions of the laws in force and applicable to Hotmart Company, as well as Hotmart Company internal policies.

# Records of Donations and Integrity Vetting

All documents related to donations and sponsorships made by Hotmart Company must be contractually recorded in an accurate, complete and truthful manner, with full transparency and accountability.

**All recipients of donations or sponsorships must undergo integrity vetting to ensure that the transaction is in accordance with Hotmart Company principles and values and the purpose of the donation.**

# Communicating with External Audiences

## **Social media**

Every Employee is accountable for what they post on their social media profiles and those posts should exclusively reflect their personal views and clearly not represent Hotmart Company's position.

Under no circumstance should you use your social media to post, release, debate, or discuss content concerning Hotmart Company. Only official spokespersons, approved by the Marketing and External Affairs Departments, may post on social media on behalf of the company and establish dialogues with the various media and press outlets.

## **Interviews**

Employees who are invited to give interviews, talks or to attend other events that involve possible exposure of topics related to their work at Hotmart Company should contact the External Affairs or the Legal Department for the appropriate approvals.

# Relationship with Public Agencies and Agents

## **Compliance with anti-corruption legislation**

Hotmart Company does not tolerate any kind of corruption, whether public or private, and is committed to fully complying with the applicable legislation as well as high standards of ethics and integrity.

## **Government inquiries**

Hotmart Company may receive inquiries and/or communications from government agencies or courts. If you are contacted by a government agency or court, contact the Legal Department before responding.

## **Interactions with national or foreign Public Agents**

All interactions with Public Agents must be previously approved by the External Affairs team and the communications must be professional, respectful, transparent and properly recorded.

When interacting with Public Agents it is expected that all Employees position themselves against illicit or unethical practices and observe the following guidelines:

# Relationship with Public Agencies and Agents

## **Meetings**

The scheduling of meetings with Public Agents must be formalized, by email or via official scheduling platforms, with a clear and precise description of the subject, date, place of the meeting, and the people who will take part in it.

The meetings must take place with the presence of at least two Employees and recorded in an internal report, with a clear and precise description of what was discussed. Such report must be filed by the External Affairs team.

## **Anti-corruption stance**

The mere offer by an Employee, or solicitation by a Public Agent, of undue advantages, whether accepted or not, constitute acts of corruption and are considered a crime under the laws of the countries we operate.

In the event of being approached by a Public Agent with an illicit or improper proposal that puts, or may put at risk compliance with this Code or the law, Employees must immediately interrupt the contact, indicating that they do not condone such practices and inform the compliance officer.

# Relationship with Competitors

## **Our stance on competition**

Hotmart Company works in an honest and transparent manner, respecting the market and its competitors. Employees that receive information from competitors must make sure such information is public and does not violate any confidentiality commitments.

## **Fair claims**

We are certain that our success is a result of the superior quality of our products and services as well as our people. We shall never make false claims about our competitors.

## **Interaction with competitors**

In the case of interaction with competitors, the meetings must be held by more than one Employee and be formalized and recorded, whenever possible. You may formalize these interactions by sending an email on the matters discussed or minutes with the summary of the meeting. Such interactions must always comply with the competition laws.

## **Questions**

If you have questions about how to proceed in communicating with competitors, consult the Compliance Manager before proceeding with the intended interaction.



# **7. What to do in Cases of noncompliance with this Code, other Hotmart Company internal policies, regulations or legislation**

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# Ethics and Compliance

Hotmart Company, in its commitment to ensure that its activities are conducted with transparency and integrity, has developed an Ethics and Compliance Program

## Our Ethics and Compliance Program:

- 1.** A set of rules and policies to ensure compliance with our ethical obligations.

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- 2.** Implementation of controls to monitor, analyze and manage risks to ensure consistent compliance with rules and policies.

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- 3.** Training plan for Employees with mandatory attendance, to ensure they are up to date regarding Hotmart Company ethics and integrity guidelines.

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- 4.** Whistleblower channels that ensure impartiality and confidentiality for reporting any violations of this Code or the law.

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- 5.** An independent compliance area that is responsible for developing, implementing, and managing Hotmart Company Compliance Program.

# Reports of Code Violations

Hotmart Company encourages whistleblowing and is committed to the investigation and proper forwarding of reported cases of violation of the standards in force, internal policies and this Code.

If you see, hear or learn about any inappropriate behavior, or even if you are in doubt on how to proceed in a certain situation, you must share your concerns! Contact your leader or the compliance officer.

## Reporting Channels

Hotmart Company provides several channels for reports involving noncompliance with this Code, Hotmart Company policies and/or the law.

These channels are available 24 hours a day, 7 days a week and can be accessed using the contacts below:

The Hotmart Company Ethics Line:  
<https://ethicsline.hotmart.co>

Phone numbers:

**Brazil** 0800 591 7180

**The US/Canada** 1 (888) 498-1797

**The Netherlands** 0800 022 1507

**Spain** (+34) 900 98 34 38

# Protection to Whistleblowers

Everyone should feel safe when submitting a report and contributing to the maintenance of a healthy, respectful and ethical Work Environment.

Hotmart Company ensures the following protections to whistleblowers:

- 1. Anonymity and protection of their identity, if they prefer and request it;**
- 2. Secrecy of the proceedings;**
- 3. Impartiality in the analysis of the reported fact;**
- 4. The right to information about the status of the proceedings;**
- 5. Non-retaliation.**

Hotmart Company guarantees that no one will be retaliated against because they submitted a report or contributed to an investigation of a report.

If you suspect retaliation or have any questions about it, please reach out to the Compliance Manager or the legal department.

# Whistleblower Responsibilities

## **Bad faith reporting**

The whistleblowing channels must be used responsibly. Any reports made in bad faith may be subject to the adoption of disciplinary measures by Hotmart Company.

## **Disciplinary measures**

Verified and confirmed violations of this Code, Hotmart Company policies or the applicable law are subject to disciplinary actions by Hotmart Company, which may include, but are not limited to: (a) verbal or written warning; (b) suspension; (c) termination of employment for cause or without cause; (d) removal from office or position; or (e) termination of the contractual relationship, without the need for justification. Those who deliberately fail to report violations or omit to report relevant facts or information are also subject to these measures.

## **Forwarding to the authorities**

Hotmart Company may forward a copy of the internal investigative procedure to the responsible authorities if there is evidence of administrative irregularities, civil or labor illegalities or suspected conduct that constitute law violations or criminal misdemeanors.

# Glossary

This Glossary is part of Hotmart Company Code of Ethics and Conduct. It lists the meaning of expressions that start with capital letters. We suggest that you read the following definitions carefully and attentively.



**"Affiliate"** - User registered in the Affiliate Program who, while using Hotmart Services, sells products in exchange for a remuneration equivalent to a percentage of the amount of each sale they promote, as described in Hotmart's Terms of Use.

**"Code"** - This Code of Conduct.

**"Confidential Information"** - Any sensitive and non-public information, know-how or data, technical or otherwise, provided by Hotmart Company or Third Parties, whether orally, in writing, or in any other form and received in the exercise of work-related activities.

**"Creator" or "Producer"** - User who registers a product on their own behalf and is the exclusive owner of all intellectual property rights relating to the product, or who is regularly authorized by the holders of such rights to create, promote and sell the product on the Platform, according to Hotmart's Terms of Use.

**"Discrimination"** - Hotmart Company considers discrimination any disrespectful or offensive distinctions, differentiations, relegations or comments based on racial, ethnic or gender characteristics, gender expression and identity, language, culture, religion, sexual orientation, national or social origin, economic position, marital status, age, disabilities, health conditions, political opinion, or any other opinion, among other differences.

**"Diversity"** - A set of cultural, biological, social, and economic characteristics that make each individual unique.

**"Employees"** – Employees, interns, apprentices, managers, executives, and directors of Hotmart Company and all Hotmart Company enterprises.

**"Harassment"** – consists of any verbal, virtual or physical abusive conduct that exposes someone to vexing or humiliating situations, in a repetitive and prolonged manner. In the workplace, harassment committed by a hierarchical superior can be either moral or sexual. While the technical definition of harassment may vary depending on jurisdiction, Hotmart Company requires that all Employees observe this Code of Conduct definition, even if it is more restrictive than an individual jurisdiction.

Additionally, should a jurisdiction in which Hotmart Company operates maintain a different definition or set of laws on harassment, Employees are required to adhere to the local laws if they are more restrictive than the requirements set by Hotmart Company.

A. Moral harassment is any conduct aimed at lowering Employees self-esteem and, ultimately, their disengagement from the job.

B. Sexual Harassment corresponds to any form of intimidation related to unwanted sexual behavior, usually committed by someone in a position of greater power (not only hierarchical, but in all spheres and in all areas), which manifests itself by means of threats or insinuations of threats that inhibit the decision-making of the harassed person, based on their convictions.

**"Hotmart Company"** – Jointly, Hotmart Company B.V. and all its subsidiary or affiliate companies, and those who may join the company in the future, including Hotmart B.V, Teachable, LaunchPad, among others.

**"Inclusion"** – Valuing and including populations of certain considered vulnerable groups (women, black people, people with disabilities, lesbians, gays, bisexuals, trans people, intersex people, people aged 60+, among others).

**"Materials"** – Digital or physical creations and assets, such as source code, data models, texts, templates, resumes, images, and any other creations belonging to Hotmart Company, developed in the course of the company's activities, or acquired by it.

**"PEP"** – Stands for Politically Exposed Person, i.e. those persons who, in the last five years, perform or have performed relevant public functions, a concept that also encompasses, by extension, their family members, close associates, or legal entities in which they participate.

**"Public Agent"** – One who exercises public functions, even if temporarily or without remuneration, by election, appointment, designation, hiring or any other form of investiture or bond, mandate, position, job or function in the government, including government agencies, state-owned companies, mixed economy companies, international organizations, candidates for political office at any level, members of political parties, members of the Executive, Judiciary, and Legislative branches, as well as any individual who works for a service provider company hired or has an agreement to perform activities typical of the Public Administration.

**"Third Parties"** – It means Hotmart Company partners, customers, suppliers, and any of those who, to some extent, have a relationship with Hotmart Company.

**"Work Environment"** – Consists of (a) Hotmart Company premises, even when working from home; (b) places in which Employees are performing their activities, both on Hotmart Company premises and externally; and (c) any environments where there are get-togethers, gatherings or celebrations hosted by Hotmart Company or any partner. In addition, Hotmart Company official communication channels, such as official corporate chats, emails and virtual meeting rooms are also considered work environments for all purposes.



