



Human Rights Policy

According to the United Nations Organization (UNO), Human Rights are basic constituent rights of every human being and for that reason they apply to everyone irrespective of their status in life, with rules that acknowledge and protect the dignity of everyone. These fundamental rights cannot be looked on selectively from a hierarchical perspective, ignored and disrespected by states, companies or institutions.

This Policy represents the commitment of SIMPAR and its subsidiaries ("SIMPAR", "The Company") in regard to Human Rights and how they are represented in the company's culture, decisions and business strategies, as well as in its day-to-day activities, serving as a benchmark for everything it does, in line with the Company's values and in accordance with other policies already published, especially the Code of Conduct and the Third-Party Code of Conduct, the Social Investment Policy and the Sustainability Policy. The document provides guidelines for SIMPAR on the question of respect for Human Rights in every region where it is present and during the entire life cycle of its operations.

SIMPAR's principles consist of respect for, and awareness and promotion of Human Rights in its business, operating in accordance with the precepts of the Brazilian Constitution and those of international treaties and conventions ratified by the State, for example, the International Charter on Human Rights, the United Nations Guiding Principles on Businesses and Human Rights: implementation of the United Nations "Protect, Respect and Remedy" Framework and the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization - ILO, as well as the institutional commitments embraced by the company, such as:

The United Nations Global Compact;

Women's Empowerment Principles – United Nations

- The Childhood Brasil Declaration of the Corporate Commitment for Tackling Sexual Violence against Children and Adolescents.

1. Objectives

The purpose of the SIMPAR Policy on Human Rights is to set out the basic guidelines for protecting and preserving human rights within the Company, while contributing to fostering these rights across its entire value chain and sphere of influence.



2. Scope

The SIMPAR Policy on Human Rights applies to all employees of the Company and its subsidiaries, as well as the totality of its various stakeholders, including subcontractors that provide services to the company, who must also abide by the provisions of this Policy, so as to promote the principles to its subcontractors and suppliers through the Code of Conduct, providing guidance and respecting human rights across the entire value chain and communities of the interest to the Group.

3. Principles

SIMPAR's operations are founded on Human Rights in accordance with the structure of the five United Nations Guiding Principles on Businesses and Human Rights:

- I) People management;
- II) Community relations;
- III) Involvement of the entire value chain;
- IV) Due diligence in human rights;
- V) Health and safety.

As defined, each principle describes the processes based on which one seeks to ensure that respect for human rights is incorporated into every facet of the business and in the stakeholder relationships, in addition to identifying potential risks of their being violated in operations and in offerings of products or services. To that end, specific guidelines are described involving each of the five principles mentioned above, which must be adhered to when conducting business in order to achieve the Company's intended objectives.

I) People management

- a) Suppliers must provide proper working conditions and a diverse environment of safety and health;
- b) Valuing people and diversity, ensuring respect for differences and equality of opportunities in access, remuneration and professional promotion;
- c) Fighting prejudice and discrimination on account of race, skin color, ethnicity, nationality, social status, age, religion, gender, sexual orientation, personal esthetics, physical, mental or psychological state, marital status, opinion, gender identity or any other factor of individual differentiation;
- d) Preventing and curtailing psychological, physical and sexual violence in work relationships;
- e) Respect for freedom of association and collective bargaining;



- f) Fostering habits of awareness and education in human rights within the workforce, ensuring that all employees are aware of the guiding principles of this policy and that they apply them in their daily routines in and outside the Company;
- g) Provide an independent corporate channel structured and managed by third parties that ensures balanced investigations into complaints of the workforce arising from human rights violations.
- h) All employees and suppliers must adhere to the principles of ethics and anticorruption set out in the Code of Conduct, in the Anticorruption Policies and other documents dealing with this issue.
- i) Foster the valuing of people and respect for diversity of knowledge, experience, behavior, cultural aspects, age and gender groups to enable a plurality of arguments and a higher-quality, more secure decision-making process in SIMPAR's business.
- j) The Company repudiates any form of forced, mandatory or hard labor both in its own operations and throughout the entire value chain of the business.
- k) Respect for the rights of children and adolescents based on the Child and Adolescent Statute, the UNICEF Business Principles and the UN Global Compact, repudiating any form of child labor reflected in the fact that neither the Company nor its subsidiaries employ persons under the age of 16, except as apprentices from the age of 14 onward, with due regard for the stipulations of the law regarding terms for hiring.
- l) Fostering fair work relations with employees and the entire supply chain, respecting all workers' rights and paying wages within the legal standards.

II) Community relations

- a) SIMPAR and its companies respect the communities and encourage management of socio-cultural, human, economic and environmental impacts, thereby contributing to local development;
- b) In every community where it is located, the Company invests in productive inclusion, especially through training and inclusion programs for young people in situations of extreme social vulnerability;
- c) Respecting the rights of indigenous people and quilombola communities, among other traditional peoples, their self-determination, access to land, their ways of life and their cultural and social principles;
- d) Respecting the right to an ecologically balanced environment, identifying and mitigating potential risks arising from its operations and investing in opportunities for generating a positive socioenvironmental impact for society;
- e) Engaging in a transparent manner with the communities potentially affected by the Group's activities through prior and informed free consultation initiatives.



f) Promoting human rights awareness and engagement actions, paying special attention to fostering the rights of children and adolescents – with specific efforts to combat the sexual exploitation of children and adolescents.

III) Involvement with the entire value chain

a) Sharing the principles of ethics and commitments to respect human rights within the supply chain and among third parties;

b) Fostering awareness practices in human rights with the supply chain and partners;

c) Encouraging suppliers and partners to comply with the fundamental principles of labor advocated by the International Labor Organization – ILO; and

d) Taking action against degrading or hard labor practices as well as any disregard for the rights of children and adolescents by creating punitive measures such as the imposition of fines and termination of contracts with suppliers in case of violations.

e) Complying with the legislation and regulations of the locations where it operates and cooperating with authorities in respecting and promoting internationally recognized human rights. In addition to cooperating with investigations into any incidents involving disregard for these rights throughout its production chain.

f) Respecting and fostering human rights in customer relationships, aligning values and ensuring coherence in the partnerships created across the entire value chain.

IV) Due diligence in human rights

a) Identifying, assessing, prioritizing, dealing with and monitoring risks of human rights violations arising from SIMPAR's activities;

b) Rectifying and redressing impacts on human rights arising from the Group's activities;

c) Monitoring the effectiveness of human rights engagement across the Company; and

d) Providing permanent and transparent feedback to stakeholders about the SIMPAR's performance in regard to human rights.



V) Health and safety

- a) Providing safe and healthy work locations for all employees, by complying with laws and internal rules concerning occupational health and safety.
- b) Fostering health, safety and well-being for all those who are part of its staff, bearing in mind their different needs, including in the offer of benefits and human resources policies.
- c) Structuring the work environment and providing the appropriate equipment that takes into account the peculiarities of all personnel, including those with disabilities and impaired mobility. This includes uniforms, PPEs, restrooms and locker rooms of sufficient size, respecting local safety standards at all times.
- d) Fostering disclosure and strengthening a culture of safety, developing risk awareness and promoting responsible behavior of its workers through talks and training, among other activities

4. Training and implementation of the policy

Employees in all positions, including senior management, and suppliers of products and/or services must receive training about this Policy on Human Rights when it is launched and when its content is amended.

New employees will receive training at the time of onboarding during their admission. During training, everyone must undertake to comply with it.

The Policy on Human Rights will also be widely disseminated among suppliers, clients, investors and other stakeholders of SIMPAR and its subsidiaries through the communication channels with each stakeholder group.

5. Whistleblower channel and enquiry

A whistleblower channel managed by third parties is available for internal and external stakeholders. The whistleblower channel is available for reporting acts that infringe the Company's Code of Conduct, internal rules and regulations, prevailing legislation and/or other acts that could adversely affect any activity of the company, its employees, shareholders and other stakeholders.

This channel is governed by the principles of confidentiality, respect and grounds, fully respecting the rights and guarantees in the process both in the analysis and proof of the notifications received. The channel functions 24 hours a day, 7 days a week. The investigations are carried out by the Internal Controls, Risks and Compliance area and reported to the main governance bodies of SIMPAR.



SIMPAR vehemently condemns all and any form of retaliation against any whistleblower who has filed a complaint in good faith and in a responsible manner, even if their complaint proves to be groundless as set out in the Code of Conduct and corroborated by this policy.

Another channel that the Company provides is the *Linha Transparente* (Transparent Line), a free channel for clearing up doubts and seeking guidance on issues referring to the Compliance Program, the Code of Conduct, the Anticorruption Policies and other Company internal rules and regulations and governing legislation.

6. Monitoring

SIMPAR will share its best practices on rights, and those of its operating units, based on complaint mechanisms for the purpose of creating effective channels of redress for local stakeholders in regard to this Policy and may also hire independent third parties to monitor compliance with its Policy.

The company's performance in these processes will be disclosed in the Annual Report or in other available publications and on the communication channels available to SIMPAR's various stakeholders.

7. Revision

This Policy, which provides guidance, training and communicates with the entire Company, has been endorsed by the Board of Directors of SIMPAR and is undergirded by the Code of Conduct and the Code of Conduct for Third Parties.

The document will be revised in the event of organizational, legal or business changes so that it remains pertinent, adequate and effective while substantially defending the human rights of all SIMPAR stakeholders.

8. Glossary

Child Labor: According to Convention 138 of the ILO

Hard labor: As set out in Convention 29 of the International Labor Organization (ILO).

Indigenous peoples and tribes: These two terms refer, respectively, to:

- a) tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations;



b) peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institution.

(Article 1.1 of ILO Convention 169)

Due Diligence: According to the Guiding Principles on Businesses and Human Rights (principles 17 to 21), the term "due diligence" in human rights refers to a continuous management system that the company adopts in accordance with the sector in which it conducts its business, the context of its operations, the company's size and other factors in order to ensure that human rights are respected and so as not to contribute to the violation of those rights. This process involves "identifying, preventing, mitigating and being held accountable" for the potential adverse impacts caused by the company.