COMPLIANCE POLICY

1.   OBJECTIVE

Establish Compliance guidelines and practices to maintain the integrity of activities and strengthen the ethical culture at Randon Companies.

2.   APPLICATION AND SCOPE

This Policy applies to all Randon Companies, and third parties related to the activities of these companies.

3.   REFERENCES

- Randon Companies Code of Ethical Conduct.
- Anti-Corruption Policy.
- Risk Management Policy.
- ABNT NBR ISO 19600:2014 - Compliance Management System – Guidelines.

4.   DEFINITIONS

Managers and Employees: any person with a statutory or employment relationship with the Company, as well as interns and young apprentices.

Compliance: complying with all legal obligations, maintaining ethical values and establishing control systems to ensure compliance.

Randon Companies: Randon Companies means Randon S/A Implementos e Participações, its subsidiaries and affiliates, either direct or indirect.

Compliance Risk: effect of uncertainty on compliance objectives, characterized by the impact and probability of non-compliance with companies' obligations.

5.   INTEGRITY PROGRAM

The Randon Companies Integrity Program (Randon ID) should strengthen the company's values and principles. To this end, the Compliance process establishes activities to meet the needs of managing regulatory risks, interacting with processes, maintaining a culture of integrity and continuous improvement

of the Compliance management system in an effective and agile way, considering the following governance principles:

- Report directly to the Board of Directors;
- Independence of the Compliance function;
- Adequate resources for the Compliance function.

6. COMPLIANCE ACTIVITIES

In order to comply with compliance activities, Compliance risk management resources must be maintained with the following minimal considerations:

- **Code of Ethical Conduct**: document that must establish the guidelines for the performance of managers and employees, describing the standards of behavior and ways of acting, in accordance with the mission, ethical values and objectives of the Company.
- **Corporate Policies**: documents that should guide the Company's decisions and act as guidelines to give consistency to the strategies of Randon Companies.
- **Ethics Channel**: means of communication that must capture reports of situations that do not comply with the ethics and guidelines of Randon Companies.
- **Compliance Due Diligence**: activity that must identify Compliance risks in contracting suppliers and service providers.
- **Due Diligence Monitoring:** activity to supervise third parties after hiring, especially those considered high risk.
- **Communication and training**: action that should strengthen the ethical culture through an annual communication plan and internal training.

7. RESPONSIBILITIES

Board of Directors
- Approve Compliance policy
- Approve Code of Ethical Conduct and corporate policies
- Ensure adequate resources for the Compliance function

Ethics Committee

- Support the execution of the Integrity Program for Randon Companies, encouraging the commitment of senior executives and sponsoring the actions of the Compliance management system

- Ensuring that the Compliance management system is applied in the Company's processes.

- Monitor the execution of the Integrity Program, participate in decisions regarding deviations involving the Senior Management of Randon Companies, and when requested, participate in deliberations on critical non-compliance practiced by managers and employees.

Risk Management and Compliance Area

- Manage and establish the activities of the Integrity Program for Randon Companies based on the best practices of the Compliance management system.

- Periodically provide training related to the Integrity Program, applicable to managers and employees, and service providers physically allocated to the Company.

- Promote the inclusion of Compliance responsibilities in job descriptions and employee performance management processes.

- Establish and monitor compliance performance indicators.

- Provide objective advice to the organization on compliance-related issues.

8.   CONTROL INFORMATION

This Policy was approved by the Board of Directors on November 07, 2017 and has been effective since August 2017.

Responsibilities for this document:

Author	Review	Approval
Risk Management and Compliance Area	Ethics Committee	Board of Directors

Last review:
Date: Nov 10, 2022