

# ANTI-CORRUPTION POLICY

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## 1. PURPOSE

3R Petroleum Óleo e Gás S.A. ("3R" or the "Company") has ethics as its main value when conducting business. Based on this value, 3R has adopted this Anti-Corruption Policy ("Policy"), which is applicable to the Company, its subsidiaries, and potential partners, as well as to its directors, officers, employees, agents, representatives, and any other associated persons of the Company.

Counting on the commitment of the Company's Senior Management, the main goal of this Policy is to prevent possible violations of rules applicable to 3R, especially the Anti-Corruption Laws and to allow the Company to promptly respond any suspected misconduct.

### 1.1. Application and Scope

3R's Anti-Corruption Policy applies to 3R's own Company Personnel and Third Parties. The Company expects all its Company Personnel and Third Parties to observe the standards contained in this Policy and in its other Compliance Policies.

This Policy meets the main Anti-Corruption legislation as well as international Compliance standards and must be applied together with 3R's other Compliance Policies.

## 2. REFERENCE DOCUMENTS

- POL-GRC-001 – Code of Ethics and Conduct
- PG-CORP-GRC-001 – Procedure of Complaint Investigation
- PG-CORP-GRC-002 – Third Party Due Diligence Procedure
- PG-CORP- SMS - 001 – Integrated Management System Handbook

## 3. DEFINITIONS

**3R OU COMPANY:** 3R Petroleum Oil & Gas and all its subsidiaries

**ANP:** National Agency of Petroleum, Natural Gas and Biofuels.

**ANTICORRUPTION LAWS:** Group of Laws, Decrees, Ordinances and Instructions set forth to prevent irregular conducts such as fraud, corruption and other illegal acts, in particular the Brazilian Penal Code; the Brazilian Clean Companies Act (Federal Law 12,846/2013); the Federal Decree 8,420/2015; the Brazilian Administrative Improbity Act (Federal Law 8,492/1992); the Brazilian Anti-Money Laundering Act (Federal Law 9,613/1998 and Federal Law 12,683/2012); the Brazilian Public Procurement Act (Federal Law 8,666/1993 and Law 14,133/21); the Brazilian Antitrust Act (Federal Law 8.884/1994 and Federal Law 12,529/2011); the U.S. Foreign Corrupt Practices Act of 1977 (FCPA), and the UK Anti-Bribery Act (UKBA).

**BENEFICIARY:** Any non-profit institution that receives donation or sponsorship from 3R Petroleum.

**BOARD OF DIRECTORS:** Collegiate body formed by members of the Company's Executive Board, elected by the Company's Board of Directors, with at least one Chief Executive Officer, one Investor Relations Officer, one Financial Officer and the others with no specific designation. All the Executive Officers will be residents in the country and will have a unified mandate of 2 (two) years, and they can be reelected.

**COMPANY PERSONNEL:** All the Company's employees, regardless of their hierarchical level, including board and committee members, directors, managers, employees, interns, and trainees.

**COMPETITORS:** Companies that operate in the same line of business and engage in commercial activities similar to those of the Company.

**COMPLIANCE POLICIES:** Políticas destinadas a estabelecer regras no âmbito da Companhia, de cumprimento de todos os Colaboradores, com o objetivo de dar pleno atendimento às principais Leis, Decretos, Portarias, Resoluções ou Instruções aplicáveis à Companhia em especial aquelas que buscam coibir condutas de fraude, crime ou corrupção.

**COMPLIANCE PROGRAM:** The integrity program, in the context of Decree 8,420/15, is the set of mechanisms and internal procedures for integrity, auditing, encouraging whistleblowing, and the effective application of codes of ethics and conduct, policies and guidelines with the specific objective of detecting and correcting deviations, fraud, irregularities and illicit acts committed against the public administration (domestic and foreign).

**COMPLIANCE COMMITTEE:** Group composed of the Compliance Officer, members of the Compliance Area, if necessary, and at least two and a maximum of three Managers and/or Directors. Additionally, the presence of one member of the Board of Directors will be optional. The members of the committee will assist the Compliance Officer in making decisions and in the smooth running of 3R's Compliance Program. The appointment of its members is the responsibility of the Executive Board, and the approval of the respective names must be endorsed by the Board of Directors.

**COMPLIANCE:** To ensure, in an ethical manner, compliance with principles and values, reflected in policies, procedures and internal rules, and with the laws and regulatory provisions to which it is subject, so as to avoid misconduct and preserve the generation of the entity's economic, environmental, and social value.

**CORPORATE DEVICE:** Any device provided by the Company for business purposes, such as e-mail addresses, computers, cell phones, etc.

**CORPORATE GOVERNANCE:** Corporate governance is the system by which companies and other organizations are directed, monitored, and encouraged, involving the relationships between shareholders, board of directors, management, supervisory and control bodies, and other stakeholders.

**ETHICS:** A collection of the value judgment or moral value norms present in a person, society, or social group.

**PUBLIC ADMINISTRATION:** Comprises the National Public Administration, whether direct, indirect, or foundational, from all the Powers of the Union, States, Federal District, Municipalities, Territory, public companies or legal entities in which the state has more than 50% of the equity or annual revenue.

**PUBLIC OFFICIAL:** Anyone who holds, even if transitorily or without remuneration, a public function or employment, as well as anyone who holds a post, employment, or function in government agencies, or in foundations, public companies and mixed economy companies, and other entities that are, directly or indirectly, controlled by the Public Administration.

**REPORTING CHANNEL:** Channel available for communications, anonymous or not, of doubts, violations, or suspicions of violations of the provisions of the Code of Ethics and Conduct, this Policy and other Company policies, and the legislation in effect.

**SENIOR MANAGEMENT:** Those are the people or a group of people who direct and control the Company at the highest level. 3R's Senior Management consists of the members of the Board of Directors, the advisory committees to the Board of Directors, and the Executive Board.

**THIRD PARTY:** Anyone who is not Company Personnel, but who is entitled to provide goods, services or to represent in the name, benefit, or interest of the Company.

**UNDUE ADVANTAGE:** Any advantage not authorized by law and that is offered or granted to a Public Official, by whoever (individual or company) has a direct or indirect interest in an act resulting from his or her attributions.

## 4. RESPONSIBILITY AND AUTHORITIES

### 4.1. Senior Management

- To promote the dissemination of the Company's culture of ethics and integrity.
- To make resources available so that the necessary measures can be implemented.
- Monitoring the evolution of the culture and maturity in Ethics, Conduct and Integrity issues.
- Promote and monitor the management of fraud and corruption risks.
- Disseminate values and principles of ethical conduct through the leadership.

### 4.2. Policy Manager

- The Compliance Area is responsible for the critical analysis and review of the Code of Ethics and Conduct.

- In addition, the Compliance and Governance Area is responsible for conducting the complaint investigation processes, as well as managing the Company's Integrity Program, in order to ensure the integrity of business relationships and keep Senior Management aware of issues that may compromise 3R's business and/or image.

#### **4.3. Work Force and Third Parties**

- To be aware of and value the compliance with all the guidelines, rules, and standards contained in this Code and in its other Compliance Policies.

### **5. DESCRIPTION**

3R will not tolerate any unethical practice, act of corruption, or any other illicit act that is practiced directly by its Company Personnel or by Third Parties connected to the Company. It is also forbidden any act that aims at obtaining undue advantage by Company Personnel, whether by donation, promotion, or offering of any good of value to a Third Party (including gifts, hospitality, or entertainment). Likewise, Company Personnel may not solicit or accept goods of value with the purpose of obtaining any undue advantage.

In case of violation of this Policy, Company Personnel may suffer disciplinary measures described in 3R's Code of Ethics and Conduct, besides being subject to potential criminal, civil, and administrative liability. Therefore, we count on the commitment of all Company Personnel and Third Parties to comply with this Policy, in order to keep ethics as the main vector in 3R's activities and avoid liability for illicit acts.

Please refer to the other 3R Compliance Policies and contact the Compliance Area if you have any questions.

#### **5.1. Our Anti-Corruption Policy**

##### **5.1.1. Prohibition on undue advantages**

Company Personnel may not give, promise, or offer any undue advantage, directly or indirectly, to Public Officials, national or foreign, or to Third Parties, for the purpose of unduly obtaining or retaining any advantage.

For the purposes of this Policy, "undue advantage" means an advantage not authorized by law, characterized by a benefit or interest obtained through an unlawful act. The undue advantage can occur through payment in (i) cash; (ii) gifts; (iii) debt forgiveness; (iv) loans; (v) personal favors;

(vi) entertainment, dinners and travels; (vii) donations made in order to obtain a consideration; (viii) business opportunities; (ix) medical assistance, among others.

The prohibition of undue advantages also applies to friends, family and third parties related to Public Officials or business partners. Bribes, kickbacks or similar payments also constitute undue advantages and are not allowed.

Company Personnel cannot, under any circumstances, accept or receive any undue advantage. If any of the Company Personnel is confronted with a request or demand for an improper payment, undue advantage or other violation of this Policy, the request or demand must be immediately rejected and reported to his / her manager and to the Compliance Officer directly or through the Reporting Channel.

Similarly, if any of the Company Personnel knows or believes that an undue advantage has been or will be made, he or she must also report such conduct to the Compliance Officer.

In accordance with 3R's Code of Conduct, no adverse action will be taken against Company personnel or Third Party in retaliation for reporting a violation or suspected violation of Anti-corruption Laws or 3R's Policies, as long as it was made in good faith.

## **5.2. Interactions with Public Authorities**

### **5.2.1. Public Officials**

3R has a high degree of interaction with the Public Administration, especially with ANP, with environmental agencies and with Petrobras, due to its activities. For this reason, the rules for interaction with Public Officials must be strictly respected by Company Personnel and, in case of any violation to this Policy, the Company can apply disciplinary measures or interrupt agreements and contracts with Third Parties that are in breach of this Policy.

3R's Company Personnel are required to behave with integrity and transparency in all interactions with Public Officials, including during any inspections carried out at Company's facilities or when obtaining licenses and authorizations from the Public Administration.

Company Personnel must communicate in a precise and complete manner with Public Officials. They also need to maintain a record of all communications made with Public Officials. Communications with Public Officials must be conducted exclusively through official channels, for example (i) official e-mails, (ii) official phone numbers, (iii) official letters and others that contain the stamp and control number of the Public Administration.

Similarly, any communication made by Company Personnel must be done so exclusively through Corporate Devices made available by the Company, especially for those who interact with

Public Officials. Furthermore, communication must always follow ethical and transparency standards. The main Corporate Devices provided by the Company are:

- Corporate e-mails;
- Corporate phones;
- Official correspondence (with 3R's control letterhead and numbering).

Once Company Personnel receive the Corporate Device, it is strictly prohibited to exchange information through personal devices, as well as through the Company Personnel's accounts, mobile applications, and personal e-mail addresses. Likewise, it is strictly prohibited to exchange information through the Public Official's personal devices, accounts and personal e-mail addresses.

If any of the Company Personnel does not have access to Corporate Devices, for any reason, all restrictions and recommendations in this policy remain valid.

It is possible to hold meetings with Public Officials using virtual tools and platforms. It is recommended, if possible, the usage of "Microsoft Teams", officially made available by the Company. Meetings with Public Officials, both virtual and face-to-face, must have the participation of at least 2 members of the Company and the existence of a previous agenda, with an indication of the meeting's schedule, the matters to be discussed and the names of Company Personnel and Public Officials who will participate in it.

Within 5 days after the meeting, an Interaction with Public Officials Form - ANX-01-PG-CORP-GRC-005 - must be filled out and made available by the Compliance Area, containing the topics discussed during the virtual or face-to-face meeting, indicating the date, time, place, participants, the procedure adopted for scheduling the meeting, and with the signatures of Company Personnel present during the meeting.

Company Personnel must send the completed Form by e-mail to the Compliance Area.

In cases in which Company Personnel routinely interact with Public Officials, whether in person, online, or by phone, the Form may be filled out once a month with a summary of the interactions. However, should any situation occur that may potentially violate 3R's Compliance Policies or any pertinent legislation, Company Personnel must immediately report to the Compliance Area about any situation that is out of the ordinary. Examples of routine interactions are (i) project team meetings held in the execution of a contract in force; (ii) interactions related to routine, operational, and typically administrative activities (examples: inspections, execution of protocols and dispatches, follow-up of procedures on obtaining permits, licenses, and others); and (iii) interactions with Public Officials members of the Judiciary in defense of 3R's legitimate interests.

It is important to remember that all communication with the Public Official, regardless of the means used, must follow basic rules of formality, in order to avoid misunderstandings concerning the



existence of a personal and unprofessional relationship between Public Officials and Company Personnel<sup>1</sup>. As an example, Company Personnel should avoid calling the Public Official their "friend", "buddy" or any other way that may give rise to the interpretation that there is a personal relationship between the Public Official and 3R.

It is important to mention that 3R can monitor conversations and documents exchanged by Company Personnel through their Corporate Devices, as set out in the Code of Ethics and Conduct and in the Data Protection and Confidentiality Policy.

3R does not allow any of the Company Personnel to make false statements to Public Officials on behalf of the Company. 3R also does not allow the obtainment of information provided by Public Officials that can be understood as Privileged Information or that may violate the rules of the Access to Information Act.

### **5.2.2. Licenses, Permissions and Authorizations**

In order to carry out its activities, 3R must obtain licenses, permissions and authorizations from different government agencies, in particular, authorization issued by ANP, declaration of Conformity issued by the Brazilian Navy, licenses issued by the Fire Brigade and environmental licenses issued by IDEMA and IBAMA.

Therefore, it is extremely important to follow the guidelines set out in item 5.2.1 above and, in particular:

- Exchange communications only through the Public Official's and Company Personnel's official channels or means of communication;
- Inspections carried out by Public Officials in the Company locations must be attended by at least 2 of the Company Personnel;
- The face-to-face meetings will only take place with the presence of at least 2 of the Company Personnel, and with the preparation of a previous agenda of the meeting and meeting minutes after it;
- It is strictly forbidden to obtain Privileged Information, as well as to give false declarations to the Public Administration on behalf of the Company.

In addition, Company Personnel shall allow Public Officials to carry out inspections whenever requested and must inform the Compliance Officer regarding the possible inspection at 3R.

3R does not authorize Company Personnel to offer any type of undue advantage to Public Officials, especially in order to expedite the performance of Company's routine actions or to secure

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<sup>1</sup> The Public Official is obliged to treat citizens equally, according to the Federal Constitution and Law 8.429/92.

the obtainment of licenses, authorizations and permits. Those responsible for the obtainment of those licenses, authorizations and permits must ensure that no offer or acceptance of an undue or pecuniary advantage takes place.

Any Third Party that may represent the Company in the obtainment of licenses, authorizations and permits must be monitored carefully and must be previously analyzed and approved in accordance with 3R's Third Party Due Diligence Procedure.

### **5.2.3. Public Bidding Process**

3R participates in Public Bidding Processes, which requires the Company to interact with the Public Administration. For this reason, all Company Personnel involved in Public Bidding Processes must observe the rules set out in this Policy, in particular those described below.

#### **5.2.3.1. 3R Public Biddings Process Rules**

Due to its activity, 3R can participate on public biddings processes and, therefore, it is important to pay close attention throughout the duration of the bidding process and the interactions with Public Officials. To this end, the areas responsible for conducting the bidding processes must follow the appropriate policies and procedures approved by 3R's Board of Directors, as well as the Company's Governance and Jurisdiction rules.

In addition, other measures must be observed by Company Personnel during public bidding processes, such as:

- Treat the matters discussed with absolute confidentiality, and it is forbidden to share information with people not involved in the bidding process, including the information regarding 3R's participation, or not, on the public bidding process;
- Act independently, with the working group, when: (i) deciding whether to participate in the bidding process or not, (ii) analyzing the Brazilian Authority's official acts (notice or invitation); (iii) defining the amount to be established at the bid; (iv) filing an appeal. Any alignment with third parties involved in the public bidding process, in particular competitors, is strictly forbidden;
- Refrain from contacting, by any means, the public bidding Authority or competitor in order to obtain information that is unavailable on public sources or the market;
- Commit any conduct that may jeopardize the competitive aspect of the public bidding process is strictly forbidden;
- Contacts with Public Officials may only take place upon the knowledge of the members of the Working Group. If the contact is made by telephone, as soon as it is done, a written report of

the main points discussed should be sent to the WG. The Working Group must be copied in all e-mails exchanged with the Public Officials.

- In case of a face-to-face public event or any meeting with Public Officials, at least 2 of the Company Personnel shall participate and they must always observe the rules set out in item 4 of this Policy;
- All actions and communications related to the public bidding process must be recorded and filed in the Company's record for at least 5 years.

The same precautions indicated above shall be applied when interacting with third parties during and after the public bidding process.

#### **5.2.4. Hiring Public Officials or Former Public Officials**

Hiring Public Officials or former Public Officials may expose 3R to integrity risks. They must be hired solely based on their expertise and/or to provide technical assistance to the decisions of the Company, never to facilitate access to Government Entities, Public Authorities or to obtain confidential information.

Special attention must be given to the quarantine periods mentioned in Law No 12,813 of 2013, or any other specific laws that may apply to former government officials.

Further attention must also be given to the hiring of relatives or partners of Public Officials, since this modality may be used as a form of covering unlawful activities or may raise conflict of interest as described in 3R's Code of Ethics and Conduct.

All cases above described must be assessed and the hiring of individuals subject to these provisions must be approved by the Compliance Area, which may request support from the Compliance Committee for approval, in case needed.

### **5.3. Souvenirs, Gifts, Entertainment and Hospitality**

Souvenirs, Gifts, Entertainment and Hospitality can be part of 3R's routine, as long as the rules contained in this Policy are observed.

Offering Souvenirs, Gifts, Entertainment and Hospitality should not occur often for the same Public Official, Company Personnel, Third Party or customer. More than 2 times in a period of 12 months will be considered as often, which is prohibited in this Policy.

#### **5.3.1. Souvenirs and Gifts**

Souvenirs are items with no commercial value distributed or received by Company Personnel as a courtesy, advertisement, publicity of a certain brand. The souvenir must contain a logo of the

company which granted the object, such as agendas, calendars, key chains, pen drives, pens, among others.

On the other hand, Gifts are tangible, have commercial value, and do not have the logo of a company or institution which granted them, such as: fountain pens or brands of relevant value, watches, backpacks, electronics, leather briefcases, holiday baskets, etc. If any Company Personnel receive a Gift that exceeds the amount of BRL 200.00 (two hundred reais) and has no logo on it, then this item must not be accepted.

Company Personnel are not authorized to offer, promise, receive or demand payments, Souvenirs, Gifts and non-promotional favors with the purpose of giving or obtaining an undue advantage or benefit to/from a Public Official, a client and Third Parties.

Company Personnel are not allowed to receive or give Souvenirs that do not contain 3R's logo or the other party's logo, regardless of the amount.

Exceptionally and for strictly commercial purposes, Company Personnel may provide and receive symbolic and modest Gifts, if: (i) the gift has a value of up to BRL 200,00 (two hundred reais), (ii) the gift does not involve cash or cash equivalent gifts; (iii) the gift is permitted under both local law and the policies of the recipient's employer; (iv) the gift is not an alcoholic beverage; (v) the gift is properly recorded in the Company's books and records; (vi) the gift is provided as a token of esteem, courtesy, and (vii) the gift is presented openly with complete transparency.

In addition, Company Personnel must ensure that offering any Souvenir, Gift or equivalent is in accordance with any policies applicable to the recipient, as well as the local customs and practices.

### **5.3.2. Entertainment and Hospitality**

Entertainment is an activity with the main objective of providing leisure to its participants, such as parties, concerts, sporting events, etc. Hospitality, in turn, comprises traveling (by air, sea and/or land), accommodation, food, which may or may not be related to business activities. Hospitality concerning leisure or tourism activities will be considered as a "Gift"; and, therefore, should follow the rules set out on item 5.3.1 above.

3R prohibits any entertainment or hospitality which violates ethics values, or which is aimed at obtaining an undue advantage. Entertainment and Hospitality will only be admitted in exceptional situations if they (i) are related to the promotion of the Company's products or services or to the execution or performance of its contract with a customer; (ii) are permitted under local law; (iii) are reasonable under the circumstances and are not lavish or extravagant; (iv) are not seen as inappropriate and (v) are not related to Public Officials or third parties connected to them.

All the entertainment and hospitality expenses, regardless of their value or participants, must be properly documented in an expense report. Such report must indicate the participants, including name, title, place of work and provide the business purpose.

### **5.3.3. Meals, Travel and Accommodation**

Hospitality expenses, such as meals, travel, and accommodation, must be reasonable, in good faith, paid on behalf of customers and may be permitted in certain circumstances when authorized by 3R. Permissible payments may cover the costs of travel or meals for Company Personnel or customers on strictly business-related activities, such as visiting the Company's offices or travelling in connection with a project status review.

Meals, Travel and Accommodation payments to Public Officials are not permitted.

Travel payments, accommodation, and meals to Third Parties, must follow 3R's Reimbursements Policy for the verification of the permitted amounts concerning each expense. Daily amounts of cash, expenses not related to commercial activities and expenses that may benefit a friend or relative are strictly prohibited by the Company.

Direct reimbursements should also be avoided. The reimbursements shall be made directly to the employer of the beneficiary – not the beneficiary himself.

### **5.4. Donations and Sponsorships**

3R, as a private company, is strictly forbidden to make any kind of political contribution. Likewise, Company Personnel are not allowed to make political contributions on behalf of the Company neither using its resources or structures.

Any Company Personnel who wishes to make political contributions must make it on their own name and with their own resources, without any connection with 3R.

3R may make charitable donations and sponsorships as a measure of social action. In such cases, the potential recipient of the contribution must be submitted to a prior Due Diligence conducted by the Compliance Officer or by Company Personnel appointed by her, in order to assess potential integrity risks. After conducting the due diligence, will prepared a recommendation that will be submitted to the Board's decision.

Donations and sponsorships are strictly prohibited: (i) for purposes other than those indicated to the Compliance Officer; (ii) when they are not related to the activities carried out by the benefited entities; (iii) when they aim to obtain undue advantages of commercial, regulatory or any other nature to 3R; (iv) for entities related to Public Officials or third parties connected to them; and (v) for an entity that does not have the same ethical values and social commitments as 3R.

Beneficiaries shall be made aware of the provisions described in this Policy and in the 3R's Code of Conduct, and must follow them, under the penalty of not receiving the donation / sponsorship if the rules are violated.

All donations and sponsorships made by 3R must be documented, properly recorded, monitored to ensure the correct destination of the value/good and must be formalized in accordance with the Donations and Sponsorships Procedure (PG-CORP-GRC-004), Compliance Term of Donation and Sponsorship (ANX-07-PG-CORP-GRC-002) and the Term of Donation and Sponsorship (ANX-01-PG-CORP-GRC-004).

### **5.5. Relationship with Third Parties**

The Anticorruption Laws prohibit indirect payments, or any undue advantage, made through a Third Party to Public Officials. Third Parties are those directly linked to the Company's usual activities, and may be:

- Distributors;
- Re-sellers;
- Consultants.
- Suppliers;
- Business Partners; and
- Agents or any other individual or entity working in the name, benefit, or interest of the Company.

Company Personnel who deal with Third Parties are aware that agreements and contracts may be terminated in the event of non-compliance with this Policy and applicable Anti-Corruption legislation and, as such, are responsible for taking reasonable precautions to ensure that business is conducted ethically and in compliance with this Policy, such as:

- Ensuring that 3R's Third Party Due Diligence Procedure has been applied;
- Inserting anti-corruption clause in the contracts;
- Requiring the Third Party to certify that it has not and will not violate this Policy and any Anti-Corruption Laws during the course of its business with the Company;
- Requiring the Third Party to certify that it will previously disclose to 3R the sub retention of others third parties to render services on 3R's interest or behalf;
- Monitoring the reasonableness and legitimacy of the services provided, as well as the amounts paid to Third Parties during the contracting process;

- Make this Policy, as well as the Code of Ethics and Conduct, available to the Third Party, collect and file the respective terms of acknowledgement and commitment.

Company Personnel should pay particular attention and closely monitor high-risk Third Parties whose engagement may involve interactions with Public Officials, including for purposes of obtaining permits, clearances, authorizations, or similar approvals or review by a governmental authority or agency.

#### **5.6. Record Keeping and Internal Controls**

All of 3R's expenses must be accurately reflected in the Company's financial records and all payments made with Company funds, or on behalf of the Company must be properly authorized according to 3R Compliance Policies.

Company Personnel must follow all applicable standards, principles, laws and practices for accounting and financial reporting. Company Personnel must be timely and complete when preparing all reports and records required by management. Company Personnel should ensure that no part of any payment is to be made for any purpose other than that to be fully and accurately described in the Company's books and records. False or artificial entries are not to be made in the Company's books and records for any reason.

The Compliance Area is the main responsible for the supervision and application of this Policy. The Company will carry out periodic internal and external audits, coordinated by the Planning Department, on its books and records in order to monitor compliance with this Policy.

#### **5.7. Economic Sanctions**

Economic sanctions are restrictions imposed by governments or international organizations (such as the United Nations) and are generally intended to (i) penalize a past conduct; or (ii) compel the sanctioned individual, entity or country to change its current conduct.

Economic Sanctions can be financial, trade, and travel-related and embargoes targeting individuals, companies, and countries.

The Company strictly prohibits violations of applicable economic sanctions and expects all Company Personnel to raise promptly any questions about the applicability of sanctions or about the screening procedures outlined in this policy, item 5.7.3.

##### **5.7.1. Relevant United States Regulations**

The Company attends to the restrictions imposed by the Office of Foreign Assets Control ("OFAC"), which is the body responsible for administering, implementing, and enforcing Economic

Sanctions on the commercial relationship between North American companies and their branches with countries and embargoed people around the world, in order to maintain the security of the United States with respect to terrorism and drug trafficking.

OFAC violations carry meaningful financial and possible criminal penalties. OFAC applies three types of sanctions programs:

<b>Country Based Sanctions</b>	Country-based sanctions are wide-ranging sanctions that prohibit U.S. Persons from engaging in virtually all business and dealings with any individual ordinarily resident in, entity located or organized in, or government entity of a targeted country (each, an "Embargoed Country").
<b>List-Based Sanctions</b>	List-based sanctions are targeted sanctions that prohibit U.S. Persons from engaging in transactions with (1) persons on the Specially Designated Nationals List and (2) entities majority owned by persons on the Specially Designated Nationals List ("Blocked Persons").
<b>Sectoral Sanctions</b>	Sectoral sanctions are targeted sanctions that prohibit U.S. Persons from engaging in certain transactions with Russian financial institutions, Russian defense companies, and Russian energy firms.

**Observation (1):** The list of countries and regions subject to sanctions is regularly updated and can be found online at:

<https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information>

**Observation (2):** The entities and individuals targeted for sanctions based on OFAC's restriction lists are included in Specially Designated Nationals and Blocked Persons List, which is available in an online searchable tool at:

<https://sanctionssearch.ofac.treas.gov/>

These and other similar programs administered by OFAC also prohibit U.S. persons from "facilitating" activities with sanctioned persons or in sanctioned geographies that would violate OFAC sanctions if conducted directly by a U.S. person. In other words, a U.S. person may not assist or support another's transaction as a means of avoiding or seeking a way around U.S. regulations.

Examples of prohibited facilitation include:

- Approving, financing or providing transportation or insurance for transactions involving Embargoed Countries or Blocked Persons;



- Filling orders through Third Parties for Embargoed Countries or Blocked Persons; and
- Referring business requests from Embargoed Countries or Blocked Persons to a third party (e.g., a colleague or a competitor in a jurisdiction outside of the United States).

### **5.7.2. Relevant European Union Regulations**

Within the framework of the EU's Common Foreign and Security Policy, EU sanctions are imposed through EU Regulations that have direct effect on all EU Member States. Each EU Member State has its own "competent authority" that is responsible for implementation of these sanctions by adopting local laws and regulations.

Much like the United States, the European Council passes "restrictive measures" against (i) countries, (ii) entities, or (iii) individuals. These restrictive measures include arms embargoes, travel bans, financial restrictions, and trade restrictions.

The European Union maintains list-based sanctions to further the objectives of the EU's Common Foreign and Security Policy, and to prevent the financing of terrorism. Persons or entities targeted by restrictive measures are included on the EU Consolidated List and are referred to as "Designated Persons."

The EU Consolidated List of Designated Persons can be obtained at:

<https://www.consilium.europa.eu/pt/policies/fight-against-terrorism/terrorist-list/>

### **5.7.3. Screening Procedures**

In order to avoid violating the sanction programs described above, Company Personnel must:

- Not deal directly or knowingly indirectly with persons in sanctioned regions (as listed by OFAC), which requires personnel to exercise diligent efforts and common sense to be alert to red flags for such activity;
- Before engaging with a new customer, supplier, vendor, or other trade counterparty outside of the United States, take reasonable steps to determine the owners of that company, and work with the legal department to check that company and its owners against sanctions lists, as outlined in the Company's Third-Party Due Diligence Procedure
- Take reasonable steps, including vetting during the due diligence process, to ensure that the Company is not sourcing goods, labor, materials, or parts from sanctioned regions; and
- Promptly report any suspicions, red flags, or observed wrongdoing to the Compliance Officer or on 3R's Reporting Channel.

### 5.8. Training Policy

Company Personnel must receive and review a copy of this Policy then certify in writing that they have reviewed the Policy, agree to abide by the Policy, agree to report any potential violations of the Policy (ANX-01-POL-GRC-002 - Certificate of Acknowledgment and Commitment).

Company Personnel and Third Parties will receive training at least once a year on this Policy. The trainings can be conducted virtually or in person.

The Compliance Officer may apply adherence tests before and after the training in order to verify the understanding of its content. The tests may be applied virtually or in person, with prior notice or not.

All Company Personnel must participate of the trainings and the Human Resources and Compliance areas will keep attendance records, as well as file the training evidence for at least 5 (five) years.

### 5.9. Reporting Channel

Any violation or suspected violation of this Policy must be reported on the Reporting Channel, by calling 0800 717 7775, on the website [www.contatoconfidencial.com.br/3R](http://www.contatoconfidencial.com.br/3R) or in person to the Compliance Area.

Communications can be made anonymously and 3R prohibits any type of retaliation to Company Personnel or Third Parties who makes complaints in good faith. 3R also guarantees, to the extent permitted by law, the complete confidentiality of the investigation of the facts.

3R encourages and supports the reporting on its Channel and emphasizes that the reports will also be used to identify flaws in the Compliance Program and to constantly improve its Program.

We count on the collaboration of all!

### 5.10. Revision of this Policy

The Compliance Area will perform an annual critical analysis of this Policy and the other Compliance Policies of the Company, at least every 2 years or when there are changes in the legislation and applicable rules and, whenever necessary, changes and adjustments will be proposed in order to preventively minimize any operational risks and non-conformities.

## 6. DOCUMENTATION REGISTRY

ANX-01-POL-GRC-002 – Certificate of Acknowledgment and Commitment

### 7. ATTACHMENTS

ANX-01-POL-GRC-002 – Certificate of Acknowledgment and Commitment