	POLICY
	CRISIS MANAGEMENT

1. PURPOSE

The Crisis Management Policy (“Policy”) of Tupy S.A. (“Company”) aims at establishing guidelines, setting procedures and protocols to be adopted in crisis or imminent crisis situations, as well as defining the organizational structure, roles, and responsibilities. The purpose of this Policy is to guide the implementation of appropriate responses, mitigate reputational impacts and contribute to business sustainability before, during and after a crisis, by planning, applying, and adopting measures previously defined and assessed by the Organization.

2. SCOPE

This Policy applies to the entire Company, including employees, regardless of hierarchical level, any corporations under the Company’s direct or indirect control, whether individually or jointly (“Subsidiaries”), extending to the members of the Board of Directors (“Board of Directors”), Advisory Committees (“Committees”) and the Board of Officers (“Board of Officers”).

3. REFERENCES

This Policy is supported by the following documents (non-exhaustive list):

- i. Law No. 6,404, of December 15, 1976 – Corporation Law;
- ii. Tupy S.A.’s Bylaws;
- iii. Tupy’s Code of Ethics and Conduct;
- iv. Internal Regulations of the Board of Directors, Board of Officers, and Committees.
- v. Risk Management and Internal Control Policy;
- vi. Communication Policy;
- vii. Instructions, rules and regulations issued by the Brazilian Securities and Exchange Commission (CVM) and the Novo Mercado/B3;
- viii. Other rules issued by government agencies at local, state and federal levels in the countries where we operate.

4. DEFINITIONS

Shareholders: A person, whether natural or legal, who owns one or more shares in a Corporation (S.A.).

Controlling Shareholders: shareholder(s) or group of shareholders effectively holding the power to directly or indirectly manage the corporate activities and guide the operations of the Company's bodies, *de facto* or *de jure*, regardless of their share participation.

Crisis Scenario: any and all atypical situation that results or may result in damages to the environment, the Company's shareholders, stakeholders, employees, assets and corporate-institutional image, or significantly disrupt its regular operations.

Executive Committee for Crisis Management (CEGC): committee assembled in crisis or imminent crisis situations, with the main purpose of coordinating Tupy's monitoring and response to these events.

Crisis: any event that generates negative public exposure and causes, or may cause, damage to Tupy's reputation or to its operational, financial and institutional feasibility, requiring the implementation of urgent measures to restore the Company's activities.

Employee: any individual who regularly provides services to the employer, reporting to such employer and receiving income for it.

Crisis Management: set of procedures and actions that must be implemented in a crisis situation, in order to minimize its negative impacts and identify opportunities to improve the Company's image and institutional reputation.

Incident/Emergency: facts or events that are not part of standard operations and may lead to interruptions or reduced service quality. The interruption may affect automatic processing systems, support services or essential business operations, resulting in an organization's inability to provide service for a period of time or in any action taken/carried out by the Company that creates or may create institutional risks to its stakeholders.

Crisis Risk Matrix: document defining risk events capable of triggering a crisis for the Company, indicating their severity and frequency.

Politically Exposed Person (PEP): all individuals who hold or, in the last five years, have held any relevant public office, job or function, in Brazil or abroad, or who have any family members, representatives or people within their close relationship circle that meets such conditions.

Contingency Plans: management of actions taken after a crisis event, including the resources to be mobilized and how they will be used, the measures to be adopted for crisis management and the parameters to be followed in such situations.

Communication Contingency Plan: processes and actions aimed at ensuring prompt integration and response to stakeholders.

Operational Contingency Plan: management measures defined for business areas in order to protect operations and resume regular activities in the event of a crisis.

Crisis Management Plan: aims at defining actions and individuals responsible during a crisis , comprehending scenarios that pose some kind of risk to people, assets or the Organization's reputation.

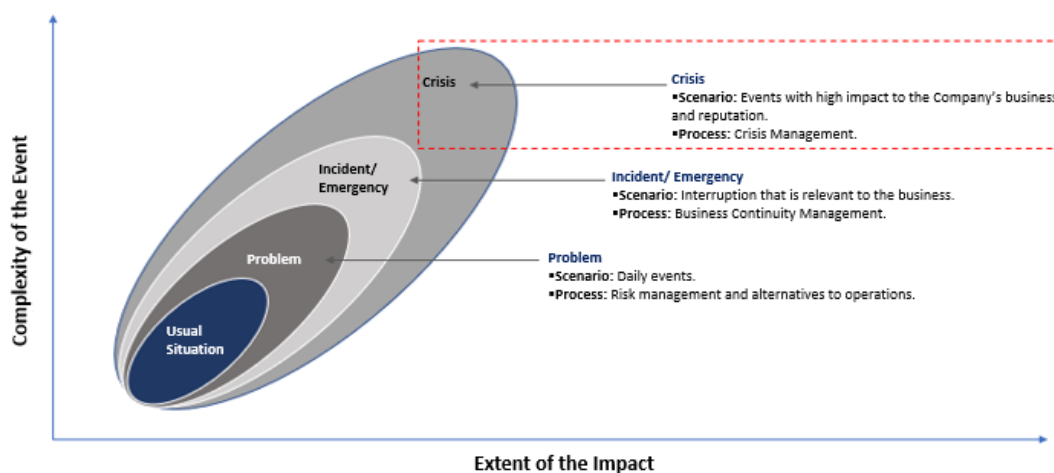
Problem: events arising during daily operations, which can produce significant impacts to the Company, when left unmonitored and not treated with due priority.

Stakeholders: parties that are affected by the entity, such as shareholders, the community where the Organization operates, its employees, customers, banks, insurers, suppliers and political actors at a local, state or federal level.

5. GENERAL PROVISIONS

The crisis management process aims at defining standards of action for all members of the Organization, so that structured, efficient and quick responses are given to crisis situations. This Policy covers the details, actions, guidelines, roles and responsibilities in the Company's crisis management process.

For better understanding, below we see details of the crisis scenarios, and to which processes they relate to in the Company.



Source: Manual de Gestão de Crises para Relações com Investidores – Deloitte (2015).

Figure 01

5.1 Guidelines

Within the crisis management process, some guidelines must be defined to support contingency actions of potential events characterized a crisis:

- i. The crisis-triggering event must be identified as quickly as possible, so as to define alternative solutions and the appropriate responses;
- ii. The situation must be controlled in the shortest possible time;
- iii. Stakeholders (Internal and external) must be communicated;
- iv. The established decision-making process must be clear and practical;
- v. Leadership must be effective within all organization levels;
- vi. Specific roles must be assigned to people who have the competencies to address crisis management;
- vii. All decisions made must be recorded, ensuring traceability;
- viii. In the post-crisis period, a critical analysis of the situation must be carried out and lessons learned should be recorded, so as to avoid recurrence.

Note: when a crisis situation arises, the members of the CEGC must be informed as soon as possible, so that they can be aware of it and work on crisis contingency actions.

5.2 Crisis Management Process

5.2.1 Identifying Critical Situations

The Risk Management and Internal Controls Area will annually carry out the “Critical Situation Mapping Cycle” in cooperation with the other business areas of the Company, mapping critical situations according to the Company’s Risk Matrix (ERM cycle), so as to identify threats and risks, their causes and potential consequences to the business.

5.2.2 Crisis Scenarios

After identifying critical situations, crisis scenarios are listed to facilitate the identification of a crisis or imminent crisis situation. Such scenarios may present as, but not limited to, the following examples:

- i. Hacking, data leakage and Cybersecurity attacks;
- ii. Threats to reputation due to scandals involving the Company and/or its Management Board;
- iii. Shutdown of Company’s operations due to environmental disasters;
- iv. Shutdown of Company's activities due to epidemics and/or pandemics;
- v. Sudden changes in the supply and logistics chain;
- vi. Serious accidents in the work environment;
- vii. Operational shutdowns due to employee strikes;
- viii. Access ban to the plant due to non-compliance with legislations;

- ix. Threat to the brand's reputation due to product quality issues (Recalls);
- x. Production interruption due to Customer's disasters;
- xi. Statements or speeches of political actors with derogatory content about the Company;
- xii. Deterioration of the financial sector, with limited banking operations;
- xiii. Operational shutdown due to wars.

5.2.3 Crisis Management Plan

The Crisis Management Plan must contain a set of measures listing the procedures (e.g., emergency and contingency plans), methodologies and protocols that must be adopted by Tupy to address the crisis when it occurs. The plan must include at least the following information:

- a. **Analysis and assessment of the most likely crises:** mapping of situations which might trigger a crisis at the Company;
- b. **The roles in crisis situations:** defining the employees responsible for managing each type of crisis, their functions and duties;
- c. **Database:** prepare documents with necessary information in cases of crisis, such as phone numbers of suppliers, authorities, etc., and all contacts who need to be called in the event of an emergency. It is recommended to have speeches previously defined for each type of crisis;
- d. **Definition of the spokesperson:** define an official source to address the problem. This person must have extensive knowledge of the matter, be prepared to deal with the press, and work in line with the Corporate Communication leadership.

5.2.3.1 Spokesperson

During the crisis management, the person responsible for Investor Relations (IR) will be in charge of the relationship with shareholders, regulatory authorities/entities and the market. The Company will assign a spokesperson to address the press in any media and social media platforms, as well as other stakeholders. This person is required to have experience, know how to act under pressure, have good communication skills, extensive knowledge about the Company, and be periodically trained.

5.3 Executive Committee for Crisis Management - CEGC

The CEGC has a corporate role and is responsible for the procedures to be adopted for crisis management, with the main purpose of coordinating the Company's monitoring and response to a crisis situation.

5.3.1 Members

The CEGC has a standard structure for all crisis scenarios:

Members:

- Chairman (leader)
- Vice-Presidents
- Corporate Legal Director
- Corporate HSE & People Director
- Director and/or Manager of the impacted operational areas
- Compliance Management
- Communications Manager
- Investor Relations Manager
- Risk Management and Internal Controls Manager
- Institutional Relations Manager

Secretary:

- Role assigned by the leader of CEGC.

If one of the members of the CEGC is directly involved in the crisis, they will be considered impeded from integrating the group and an "*ad hoc*" substitute will be assigned for the role.

The CEGC maintains permanent operations, holding annual meetings to assess the crisis management procedures and propose updates or revisions to this Policy.

Note: In case other members or business areas need to be involved, they will be informed by the members of the CEGC.

5.3.2 Actions

5.3.2.1 Response

Upon identifying a crisis or imminent crisis situation (see the Crisis Scenarios section), the person¹ holding this information must:

- i. Immediately inform the responsible manager or director, upon becoming aware of a crisis or imminent crisis situation;
- ii. Cooperate so that the Company may maintain its activities during the crisis;
- iii. Refrain from making any public communication regarding the crisis situation, as these communications will be made by the spokesperson assigned for the respective crisis;
- iv. Immediately inform the members of the CEGC upon receiving a call, e-mail, social media post or any other communication regarding the crisis situation.

5.3.2.2 Crisis Investigation and Curative Actions

- i. The CEGC must promptly act to investigate the crisis situation and has decision-making powers for as long as the crisis lasts. The initial stage consists of:
 - Informing the Board about the crisis and, if possible, communicate the emergency measures that will be taken;
 - Defining the Company's position on how to address all audiences that may be affected by the crisis; and
 - Inform the entities affected of the actions being implemented, whenever possible, even if all the facts have not yet been investigated.
- ii. Once the initial stage is completed, the CEGC must:
 - Define the roles and responsibilities of each of its members;
 - Appoint the spokesperson;
 - Discuss the contents of press releases, interviews and other communications², including internal ones;
 - Make decisions based on technical information;
 - Define priorities for actions and the individuals responsible for them;

¹ The person holding the information, or who was informed or present during the situation that generated a crisis event or an imminent crisis.

² This step should be assessed on a case-by-case basis.

- Determine measures to contain or mitigate the crisis³;
 - Maintain an open communication channel for the target audience;
 - Monitor and analyze the press coverage and repercussion in the news;
 - Be transparent when investigating facts and disclosing news;
 - Manage disclosures and updates about the situation to the target audience;
 - Record all actions taken;
 - Keep the Board of Directors up to date on the actions being taken to contain the crisis.
- iii. In the recovery and post-crisis monitoring stage, the CEGC must:
- Submit a post-crisis recovery plan for approval by the Board of Directors;
 - Assemble a task force to recover the impacted activities, such as forensic and claim analyses, disaster recovery, dispute settlement (legal) and other actions and services to support crisis recovery;
 - Assess the response to the crisis with the purpose of identifying and documenting the lessons learned, so as to be prepared for similar crisis situations;
 - Provide responses to investors, the press and social media platforms, regarding threats to the Organization's financial reputation and image;
 - Monitor and track internal and external data sources to provide indicators after the crisis scenario.
- iv. The work of the CEGC is formally concluded upon identifying that the crisis has been controlled or ended, meeting the following criteria: (i) "Qualitative" (treatment of the problem); (ii) "Quantitative" (stabilization of the affected people and/or areas); and (iii) "Repercussion" (need to provide an explanation and/or response to those involved).
- v. The CEGC must prepare a final report of the event which shall include the decisions made, consequences, impacts on the Company's reputation, lessons learned and, if applicable, recommendations for the implementation or improvement of processes, tools or practices, aiming at avoiding or mitigating the impacts of similar occurrences.

³ In the event of an insurance claim, immediately provide notice to the Finance team. The Legal Department must be informed so as to assess the need to inform the authorities.

5.4 Communication

The CEGC is responsible for defining the communications to be disclosed to all audiences⁴ regarding the crisis. The Corporate Communication, Investor Relations and Institutional Relations areas must take part in the crisis management plan, with the purpose of reducing potential damages, protecting the Organization's value and minimizing the impact to its reputation. In crisis or imminent crisis situations, they must follow the guidelines below:

- i. Communication based on evidence or facts, supported by internal or external investigations and/or reports;
- ii. Information of interest to stakeholders must not be omitted in communications, at the risk of compromising the Organization's credibility or reputation;
- iii. The message must be aimed at minimizing tension in relations with investors;
- iv. All communications must be aligned so that there is no conflict or contradictions in the disclosed information;
- v. Communications targeted at political actors must always emphasize the Company's commitment to the democracy and the Democratic State based on the Rule of Law;
- vi. The next point of action must be established by the end of each communication. The commitments established and announced to stakeholders must be feasible and achievable;
- vii. Establish priorities for communications with target audiences, as well as communication contents previously defined and approved by the CEGC, which must be revised before use.

The communication tools to be used in a crisis situation will be defined by the CEGC and may include: official notes, e-mails, meetings, bulletin boards, Intranet network, website and social media.

6. DUTIES AND RESPONSIBILITIES

6.1 Board of Directors

- a. Approve the Company's Crisis Management Policy and any revisions;
- b. Assess the effectiveness and efficiency of crisis contingency plans for the real-life situations identified.

⁴ During a crisis situation, communications to customers must be aligned by the Corporate Communication and Legal areas and approved by the Commercial Vice-Presidency, which must then present the communication to the team in charge.

6.2 Statutory Board

- a. Know and ensure the implementation and application of this Policy;
- b. Define emergency management standards at Tupy's business units;
- c. Identify potential risk materialization scenarios that could trigger a crisis in their respective sectors;
- d. Define priority for emergency or crisis response actions and support operations;
- e. Define a Cost Center, with an initial investment or spending limit to minimize impacts (depending on the duration and complexity of crisis response operations);
- f. Act as primary contact for government agencies and audiences;
- g. Put business units in charge of developing and coordinating emergency response plans and crisis management – in partnership with relevant local authorities and communities;
- h. Negotiate any obligations with government and regulatory agencies to avoid potential sanctions;
- i. Ensure the necessary staff is available so that the emergency or crisis response operation is carried out in a safe, effective and efficient manner.

6.3 Executive Committee for Crisis Management - CEGC

- a. Quickly act to investigate and provide guidance and strategic information to properly conduct the crisis;
- b. Assign roles to the members of the CEGC;
- c. Ensure all necessary resources to contain the crisis are available;
- d. Approve internal and external communications;
- e. Support (sponsor) the business areas so that the activities provided in the contingency plan are carried out;
- f. Define a minimum level of training for all involved individuals, who should be identified with roles, responsibilities and technical skills regarding the applicable plans and procedures;
- g. Coordinate the liaison among plants, corporate areas and deliberative bodies.

6.4 Corporate Communication and Investor Relations Area

- a. Develop, validate and execute the appropriate communication strategy and plan for each crisis or imminent crisis situation;

- b. Prepare and validate external communications and press releases for the media and other stakeholders;
- c. Trigger processes to monitor the repercussions of the incident in the media and social media platforms;
- d. Support the CEGC: (i) in defining the communication strategy with internal and external target audiences; and (ii) in preparing the spokesperson;
- e. Maintain knowledge and interaction flows with the Organization's main lines of defense, following the premises established in PCT 007 – Risk Management and Internal Controls Policy;
- f. Provide training for spokespeople;
- g. Provide support to the assessment of perceived (financial, legal and reputational) impacts;
- h. Maintain communication channels with stakeholders to address the complexity of the emergency and the fulfillment of previously planned demands;
- i. Consolidate the requests for information from the main investors and the market's inquiries during and after a crisis situation.

6.5 People Management

- a. Be responsible for addressing human resources matters that may arise, providing assistance to those affected by the incident, including support to employees' families and third parties, if needed;
- b. Assess, monitor and report to the CEGC the psychological impacts on employees, if applicable;
- c. Coordinate actions concerning assets security (access to facilities, removal of people and vehicles, protection of fixed assets, among others), when applicable.

6.6 Business Areas

- a. Prepare emergency response or contingency plans for potential incidents, taking into account the "Critical Situation Mapping" defined by the GRCI team;
- b. Carry out previously established training programs;
- c. Inform and coordinate leaders when addressing occurrences;
- d. Ensure the compliance and applicability of emergency response or contingency plans;

- e. Communicate relevant incidents, based on crisis scenarios;
- f. Ensure all employees are informed and trained on crisis situations.

6.7 Risk Management and Internal Controls Area - GRCI

- a. Annually carry out the “Critical Situation Mapping Cycle” in cooperation with the other business areas of the Company;
- b. Support the identification, analysis and classification of risks and potential crisis scenarios;
- c. Support the business areas in preparing response, communication and/or contingency plans;
- d. Clarify doubts on the applicability of this Policy.

6.8 Legal Area

- a. Provide support and guidance to the CEGC on legal aspects, issuing opinions on crisis-related topics;
- b. Negotiate any obligations with government and regulatory agencies to avoid potential sanctions;
- c. Provide support and guidance to the CEGC in communications with internal and external target audiences;
- d. Assess crisis scenarios and coordinate potential court defenses, if applicable.

6.9 Institutional Relations Area

- a. Provide support and guidance to the CEGC on institutional aspects, issuing statements on any eventual reputational crisis in connection with political actors;
- b. Analyze and prepare a profile of political actors involved, in order to support the company’s decision making;
- c. Provide support and guidance to the CEGC in communications with internal and external target audiences;
- d. Assess crisis scenarios that may arise with political actors;
- e. Maintain communication channels with stakeholders.

6.10 Compliance Area

- a. Provide support and guidance to the CEGC on Compliance aspects, issuing opinions on crisis-related topics;
- b. Provide the CEGC with information/history that may be relevant to understand the Crisis or Crisis Scenario;
- c. Monitor and disclose to the CEGC the reports received via Tupy's Ethics Channels, which may give rise to or intensify a Crisis or Crisis Event.

7. FINAL PROVISIONS

The contents of this Policy may be amended only if approved by the Board of Directors, whenever deemed necessary by such Management body or as a result of regulatory changes.