

# RANDONCORP

Building Tomorrow



## Policy of Disclosure Information and Trading of Securities

9th Version  
Approved on 12/12/2024

## Summary

1. PURPOSE .....	3
2. SCOPE .....	3
3. REFERENCES.....	3
4. DEFINITIONS .....	3
5. GUIDELINES .....	5
6. PURPOSE OF DISCLOSING MATERIAL INFORMATION .....	5
7. RULES FOR DISCLOSURE OF RELEVANT INFORMATION .....	5
8. FORMS AND DEADLINES FOR DISCLOSING INFORMATION.....	6
9. EXCEPTION TO IMMEDIATE DISCLOSURE .....	6
10. CONFIDENTIALITY AND RESTRICTION ON NEGOTIATIONS .....	6
11. INFORMATION ON ACQUISITION OR SALE OF RELEVANT EQUITY INTEREST.....	6
12. DISCLOSURE OF INFORMATION IN PUBLIC OFFERINGS .....	7
13. DISCLOSURE OF INFORMATION ABOUT NEGOTIATIONS OF ADMINISTRATORS AND RELATED PERSONS .....	7
14. DISCLOSURE OF FORECASTS .....	7
15. COMMENTS ON RUMORS .....	7
16. INFORMATION LEAKAGE .....	8
17. IMPROPER USE OF MATERIAL INFORMATION (INSIDER TRADING).....	8
18. SECURITIES TRADE PROHIBITION .....	8
19. EXCEPTIONS TO TRADING PROHIBITION .....	9
20. INDIVIDUAL INVESTMENT PLAN .....	9
21. DUTIES AND RESPONSIBILITIES OF THE IRO .....	10
22. BREACH OF THIS POLICY.....	11
23. EDUCATION.....	11
24. FINAL PROVISIONS .....	11
25. CONTROL INFORMATION AND THOSE RESPONSIBLE FOR THE PREPARATION .....	11
ATTACHMENT I - ADHERENCE AGREEMENT .....	12
ATTACHMENT II - MODEL OF TRADING REPORT OF SECURITIES.....	13
ATTACHMENT III - INDIVIDUAL INVESTMENT OR DIVESTMENT PLAN .....	14

## 1. Purpose

This Policy aims to regulate the use and disclosure of Material Information within the scope of the Company and its subsidiaries, as well as the maintenance of confidentiality regarding undisclosed information, and to provide guidance on the trading rules of securities issued by the Company and its publicly-held subsidiaries, as well as derivatives referenced to them.

## 2. Scope

Policy encompasses the following individuals:

- (a) the Company itself;
- (b) the direct and indirect Controlling Shareholders;
- (c) the members of the Company's Board of Directors;
- (d) the Company's Officers, both statutory and non-statutory, the latter also defined as Employees;
- (e) the members of the Company's Fiscal Council, if established;
- (f) the members of any bodies with technical or advisory functions created by statutory provision; and,
- (g) other individuals whom the Company, at its discretion, considers relevant for the purposes of this Policy and who have formally undertaken, in writing, the obligation to comply with it, including third parties contracted by the Company who have permanent or occasional access to Material Information, or any individuals who may become aware of Material Information due to a commercial, professional, or trust-based relationship with the Company, or by virtue of their position, role, or function within the Company, its Parent Company, or its Subsidiaries.

## 3. References

- Law No. 6,385, dated December 7, 1976 (Establishes the "CVM");
- Law No. 6,404, dated December 15, 1976 ("Brazilian Corporate Law");
- CVM Resolution 44, dated August 23, 2021 ("Resolution 44");
- CVM Resolution 80, dated March 29, 2022 ("Resolution 80");
- Level 1 Corporate Governance Regulation of B3 S.A. – Brasil Bolsa Balcão;
- The Company's Bylaws; and,
- The Company's Code of Ethical Conduct.

## 4. Definitions

**Controlling Shareholders or Controlling Company:** the shareholder or group of shareholders which hold control of the Company, as established by Law no, 6,404/76.

**Administrators:** members of the Board of Directors and the Executive Board, elected at the General Meeting or by the Board of Directors, acting on their own behalf or on behalf of the Company.

**Investor Relations Department or IR:** the department of the Company that supports the Investor Relations Officer in fulfilling this Policy.

**Material Act or Fact:** as defined by Resolution 44, it constitutes any decision by the controlling shareholder, resolution of the general meeting or the Company's management bodies, or any other act or fact of a political-administrative, technical, business, or economic-financial nature occurring or related to its business that may significantly influence: (i) the price of the securities of the Company or related securities; (ii) investors' decisions to buy, sell, or hold such securities; or (iii) investors' decision to exercise any rights associated with their position as holders of securities issued by the Company or related to it.

Examples of potential material acts or facts can be found in Article 2, sole paragraph, of the mentioned Resolution.

**Stock Exchange:** the stock exchanges where the Company has securities accepted for trading.

**Employees:** non-statutory officers and other professionals who maintain an employment relationship with the Company and/or its Subsidiaries and are covered by this Policy.

**Company:** Randon S.A. Implementos e Participações.

**Notice to the Market:** the instrument through which the Company will disclose other information not conceptually characterized as a Material Act or Fact but deemed useful by the IRO to inform investors and market participants, even when its disclosure is not required by current laws and regulations.

**Fiscal Council Members:** members of the Company's Fiscal Council, both regular and alternate, during the years it is established by the general shareholders' meeting.

**CVM:** refers to the Comissão de Valores Mobiliários (Securities and Exchange Commission).

**Investor Relations Officer or IRO:** the Company's director responsible for providing information to investors from the public, to CVM and to the Stock Exchanges, as well as for keeping the Company's registration up-to-dated.

**Former-Administrators:** former directors and Board of Directors members, who are no longer part of the management of the Company.

**Material Information:** any information related to the Company, the Parent Company, or any of its Subsidiaries that has not yet been disclosed to the investing public and that could significantly influence the trading price of its securities.

**Insider Trading:** the trading of securities based on knowledge of material information that is not yet public, with the aim of obtaining profit or advantage in the market, for oneself or a third party.

**Bodies with Technical or Advisory Functions:** bodies of the Company established by statutory provision or by the Board of Directors with technical functions or to advise its administrators.

**Prohibition Period or Black-out-period:** periods in which Covered Persons must refrain from trading securities issued by the Company and its subsidiaries, publicly-held companies.

**Covered Persons:** controlling shareholders, board members, fiscal council members, officers, members of any bodies with technical or advisory functions, and those who, by virtue of their position, role, or relationship with the Company, its Subsidiaries or Affiliates, or its Parent Company, have access to Material Information.

**Related Persons:** individuals who have the following relationships with Covered Persons: (i) spouse, not legally or judicially separated; (ii) partner; (iii) any economic dependent listed on their annual income tax return; and (iv) entities controlled directly or indirectly by Covered Persons or those mentioned in items "i," "ii," and "iii" above.

**Individual Investment Plan or Divestment or Individual Plan:** a commitment made by Covered Persons to implement, in the long term, a sales or purchase plan using their own funds for securities issued by the Company, pursuant to this Policy and Article 16 of Resolution 44.

**Power of Control or Control:** the power to direct the activities and guide the operations of the Company's bodies, directly or indirectly, based on facts or on the law. There is a relative presumption of control by a shareholder or group of shareholders holding shares that permanently ensure, directly or indirectly, the majority of votes in general meetings and the power to elect the majority of the Company's administrators.

**Affiliated Companies or Affiliates:** companies in which the Company has influence over management without having control over them.

**Subsidiary Companies or Subsidiaries:** companies controlled by the Company, either directly or indirectly.

**Third Parties:** people who have a commercial, professional or trust relationship with the Company, such as independent auditors, lawyers, securities analysts, consultants and institutions that are part of the distribution system, who are responsible for verifying the disclosure of Material Information before negotiate with securities issued by the Company or related to them.

**Adherence Agreement:** a formal instrument to be signed by Covered Persons, whereby they acknowledge the rules of this Policy, commit to complying with them, and ensure their compliance by those under their influence.

**Securities:** shares, debentures, subscription warrants, subscription receipts and rights, promissory notes, purchase options, indices, derivatives of any kind, or other titles or collective investment contracts issued by the Company that are legally classified as securities.

## 5. Guidelines

**5.1.** All Covered Persons must conduct themselves in accordance with the values of good faith, loyalty, and truthfulness, as well as with the principles established in this Policy and in the Company's Code of Ethical Conduct.

**5.2.** The Company's relationship with participants and opinion leaders in the Securities market must occur in a uniform, transparent, and equitable manner.

**5.3.** Covered Persons must ensure that the disclosure of information by the Company is accurate, complete, timely, and carried out by the administrators responsible for this function, as provided for in this Policy and in the applicable regulations.

**5.4.** The responsibility of Covered Persons shall extend to acts performed by third parties whenever such acts are carried out under their influence, guidance, or delegation. Nonetheless, the content of this Policy does not exempt the responsibility of third parties not directly linked to the Company who may have access to Material Information and engage in trading Securities while a Material Act or Fact is pending disclosure.

## 6. Purpose of Disclosing Material Information

The disclosure of a Material Act or Fact aims to ensure that investors have timely, efficient, and reasonable access to the information necessary for their investment decisions, providing the best possible symmetry in the dissemination of information.

## 7. Rules for Disclosure of Relevant Information

**7.1.** It is the responsibility of the IRO to assess the relevance of information that may constitute a Material Act or Fact, within the context of the Company's ordinary activities and business scale. The IRO shall disclose such information to the market, if deemed appropriate, in a clear and precise manner, ensuring its broad and simultaneous dissemination.

**7.2.** If Covered Persons believe they possess information that may constitute a Material Act or Fact not yet disclosed to the market, they must report it to the IRO, who will decide on its characterization. In case of doubt, the IRO may consult the members of the Board of Directors.

**7.3.** In cases where the decision to maintain confidentiality is not permitted by law, and in the absence of action by the IRO, Covered Persons will only be exempt from liability if they immediately report the Material Act or Fact to the CVM.

**7.4.** Meetings with trade associations, investors, analysts, or a select audience regarding matters that may constitute a Material Act or Fact must include the presence of the IRO or another person designated



for this purpose. Otherwise, the content of the meeting must be reported to the IRO to ensure its simultaneous disclosure to the securities market.

## **8. Forms and deadlines for disclosing information**

**8.1.** The disclosure of a Material Act or Fact must:

- (a) preferably occur after the close of trading on the Stock Exchange, or, if not possible, before its opening;
- (b) be simultaneously communicated to the CVM and the market through a specific system, describing the acts and/or facts that occurred;
- (c) be made available on the Company's Investor Relations website; and,
- (d) be made available on at least one (1) news portal with a webpage on the worldwide web, duly identified in the Company's Registration Form, which provides full access to the information in a freely accessible section.

**8.2.** If disclosure must occur during trading hours, the IRO may proceed with the disclosure and simultaneously request the suspension of trading of the Company's securities for the time necessary to ensure the proper dissemination of the Material Information.

## **9. Exception to Immediate Disclosure**

Material acts or facts may remain undisclosed in exceptional cases if the controlling shareholders or administrators conclude that their disclosure may pose a risk to the legitimate interests of the Company. In this case, it is the IRO's duty to follow up the quotation, price, and volume of trades of the securities issued by the Company.

## **10. Confidentiality and restriction on negotiations**

Covered Persons who have access to Material Information not yet disclosed will have the obligation to:

- (a) keep confidentiality until its disclosure to the market;
- (b) ensure that subordinates and third parties they trust also do so, responding jointly with them in the event of non-compliance with the duty of secrecy; and,
- (c) observe the prohibition on trading securities issued by the Company under the terms of this Policy.

## **11. Information on acquisition or sale of relevant equity interest**

**11.1.** The direct or indirect controlling shareholders, shareholders who have elected members to the Board of Directors or the Fiscal Council, as well as any individual or legal entity or group of individuals acting jointly or representing the same interest, that carry out relevant transactions must promptly send a communication to the IRO containing the information required under Article 12 of Resolution 44, immediately after reaching the thresholds indicated below.

**11.2.** A relevant transaction is defined as the transaction or series of transactions through which the direct or indirect interest of the aforementioned individuals or entities exceeds or falls below the thresholds of 5% (five percent), 10% (ten percent), 15% (fifteen percent), or multiples thereof, of the same class of shares representing the Company's share capital.

**11.3.** The IRO must archive the documents submitted by shareholders regarding such transactions. Upon receiving notice of the acquisition or disposal of a relevant equity interest, the IRO must also forward the information to the CVM and the Stock Exchange through a specific system.

**11.4.** In the case of an acquisition of an equity interest that results in or is carried out with the intent to change the Company's control structure or administrative structure, or if the acquisition triggers an

obligation to conduct a public offering, the IRO must disclose the information in accordance with this Policy and Resolution 44.

## **12. Disclosure of information in public offerings**

**12.1.** Immediately after the decision to conduct a public offering requiring registration with the CVM, the offeror must send the IRO information regarding the quantity of securities to be acquired or sold, the price, payment terms, and any other conditions applicable to the offering, so that the information can be disclosed to the market, except in cases involving confidential review procedures.

**12.2.** The public primary or secondary distribution of securities shall only be disclosed when it meets the criteria set forth in items I and II of Article 2 of Resolution 44.

## **13. Disclosure of information about negotiations of administrators and related persons**

**13.1.** Administrators, Fiscal Council members, and members of Bodies with Technical or Advisory Functions are required to report to the IRO the ownership and transactions involving securities issued by the Company and its controlled publicly traded companies, including stock loans and transactions involving derivatives or other referenced securities.

**13.2.** The individuals mentioned above must also disclose securities owned by Related Persons.

**13.3.** The communication must include the information outlined in the template attached to this Policy, identified as Annex II, and may also include the relevant brokerage notes. This communication must be sent within 5 (five) days after each transaction. The IRO will forward the information to the CVM and the Stock Exchange within 10 (ten) days following the end of the month in which position changes occurred.

**13.4.** On the first business day after taking office, the communication must include only the securities held as of the date of taking office. The IRO must forward this information to the CVM and the Stock Exchange within the legally established timeframe.

**13.5.** The communications mentioned in this section must include the ownership of shares, specifying the portion of shares held by the declarant that were acquired or disposed of through stock lending.

## **14. Disclosure of Forecasts**

The Company eventually may disclose forecasts and/or estimates relative to the behavior of its market sector or to its own future performance, provided that they are always accompanied of the following note, even if in other words: This presentation contains future information.

Such information is not historical fact but reflects the Company management's goals and expectations. Words such as 'believes,' 'continues,' 'expects,' 'estimates,' 'will,' 'foresees,' 'intends,' 'plans,' 'may,' and similar terms, whether written or spoken, are intended to identify statements that inherently involve known and unknown risks and are therefore not guarantees of performance.

Future results and value creation for shareholders may differ significantly from those expressed or suggested by these projections. The factors and values that will determine these results are beyond the control or prediction capacity of the Company's Management, which is not obligated to update the presentation based on new information and/or future events and is not responsible for operations or investment decisions made based on the information presented.

## **15. Comments on Rumors**

It is the policy of the Company not to comment on rumors. When questioned about any rumor, the Company will state: "it is our policy not to comment on rumors or speculations". If, however, the rumors are affecting the price or volume of trades of the securities issued by the Company, there may be the

need of making a pronouncement confirming or denying reports. This subject shall be assessed by the IRO and, if it is the case, resolved by the Board of Directors.

## **16. Information Leakage**

**16.1.** The improper disclosure of internal, confidential, and material information to the press or third parties, in violation of this Policy, jeopardizes the strategic interests of the Company, as it may result in an information asymmetry in the market and, consequently, lead to non-compliance with applicable laws and regulations.

**16.2.** The Covered Persons must be aware that the Company has appropriate channels and procedures for interaction with the press, shareholders, market analysts, and other stakeholders, with the IRO being responsible for decisions related to handling information that may constitute a Material Act or Fact.

**16.3.** Considering the importance of this matter, the Company has implemented internal procedures aimed at ensuring the confidentiality of such information, including: (i) continuous monitoring of electronic correspondence; (ii) reinforcement of the commitment of Covered Persons to safeguard the confidentiality of information; and, (iii) signing confidentiality agreements related to specific projects.

## **17. Improper use of Material Information (Insider Trading)**

**17.1.** The use of undisclosed Material Information by anyone aware of it, for the purpose of obtaining an advantage for themselves or for another person, through the trading of the Company's securities, is strictly prohibited.

**17.2.** Subject to the exceptions provided in Resolution 44, for the purposes of characterizing the above violation, the following presumptions apply:

**(a)** any person who trades securities while in possession of Material Information is presumed to have used such information in the transaction;

**(b)** Controlling Shareholders, whether direct or indirect, Officers, members of the Board of Directors, members of the Fiscal Council, and the Company itself, with respect to transactions involving its own securities, are presumed to have access to all undisclosed Material Information;

**(c)** the persons mentioned in subsection (b), as well as those with commercial, professional, or trust-based relationships with the Company, are presumed to be aware that the Material Information they access constitutes privileged information;

**(d)** an Officer or Fiscal Council member who leaves the Company while in possession of Material Information is presumed to have used such information if they trade securities issued by the Company within three (3) months of their departure, or until the Company discloses the relevant Material Act or Fact to the market, whichever occurs first; and,

**(e)** the following are presumed to be material as of the moment studies or analyses on the matter begin: (i) information regarding mergers, spin-offs, consolidations, transformations, or any form of corporate restructuring or business combination; (ii) changes in the Company's control; (iii) decisions to cancel the Company's public company registration or to change its trading segment on the Stock Exchange; and, (iv) requests for judicial or extrajudicial recovery or bankruptcy filed by the Company.

## **18. Securities Trade Prohibition**

**18.1.** The Company and the Persons Covered shall not engage in any type of transaction involving securities issued by the Company or its controlled public companies under the following circumstances:

**(a)** during the 15 (fifteen) days preceding the disclosure date of the Company's quarterly financial statements or annual financial statements. This restriction applies regardless of knowledge of the content of such information, the assessment of whether any Material Information remains undisclosed, or any



intention regarding the transaction. The counting of the 15-day period excludes the day of disclosure, but transactions with securities can only take place on that day after the information is disclosed; and,

**(b)** from the moment they become aware of Material Information until the date it is disclosed to the market;

**18.2.** When the IRO identifies the existence of undisclosed Material Information, regardless of any justification, they may establish a Black-Out Period during which the Persons Covered will be prohibited from trading securities issued by the Company and/or its Controlled Companies, and must maintain confidentiality regarding the matter. These Black-Out Periods will be announced by the RI, indicating the start date and lasting until a new announcement is made to signal its end.

**18.3.** The prohibition to trade mentioned in item 18.1 does not apply in situations provided in §3 of Article 14 of Resolution 44, where applicable.

## **19. Exceptions to Trading Prohibition**

The restrictions established in this Policy do not apply to the Persons Covered in the following cases:

**(a)** private transactions between the same Persons Covered, understood as those carried out outside the Stock Exchange;

**(b)** transactions aimed at fulfilling obligations assumed before the beginning of the Trading Prohibition Period, arising from securities lending agreements, the exercise of buy or sell options by third parties, and forward purchase and sale contracts;

**(c)** transactions carried out by investment funds or investment clubs in which the Persons Covered are shareholders, provided that they are not exclusive funds or clubs, and the investment fund manager's trading decisions cannot be influenced by the shareholders; and,

**(d)** transactions involving fixed income securities, carried out through repurchase agreement operations by the seller and resale by the buyer, for settlement on a pre-established date, earlier or equal to the maturity date of the securities subject to the transaction, carried out with predefined profitability or remuneration parameters.

## **20. Individual Investment Plan**

**20.1.** Covered Persons, Employees, Related Persons, and any person who has a relationship with the Company that makes them potentially subject to the presumptions provided for in item 15.2 of this Policy, may implement an Individual Investment or Divestment Plan, in which they must indicate their commitment to, with their own resources, buy or sell securities they own, issued by the Company, being responsible for the information provided for therein, when formulating the Individual Plan.

**20.2.** The Individual Investment Plan shall be formalized in writing before the IRO, and shall include:

**(a)** that the first transaction must be carried out within a minimum period of 3 (three) months from its presentation, as well as any modifications and cancellations;

**(b)** the nature of the planned transactions, whether purchase or sale;

**(c)** the dates or events and the approximate values or quantities of the transactions to be carried out;

**(d)** the trading period, which must not be less than 12 (twelve) months;

**(e)** the identification of the Related Persons; and,

**(f)** in the case of investment, the commitment not to sell the securities acquired under the Individual Plan before 3 (three) months have passed from the date of the last purchase, unless due to force majeure.

**20.3.** In addition to the provisions contained in item 18.2, the Individual Plan may provide for the negotiation in the periods of 15 (fifteen) days prior to the disclosure of the quarterly accounting

information and the annual financial statements, provided that: (i) the Company has approved a schedule defining the specific dates for disclosure of accounting and financial information. and, (ii) the participant undertakes to revert to the Company any losses avoided or gains earned in negotiations provided for in the Individual Plan, arising from any change in the disclosure dates, calculated using reasonable criteria defined in the Individual Plan.

**20.4.** The Investment Plan must not be formalized pending any Material Act or Fact the interested person is aware of, nor during the 15 (fifteen) days preceding the disclosure of the ITR and DFP financial reports.

**20.5.** The participant may not keep in force more than one investment plan, whether investment or disinvestment, or perform operations that override or mitigate the economic effects of the operations determined in the Investment Plan.

**20.6.** Upon the expiration of the Individual Plan, a new plan may be implemented, provided that it again meets all the requirements set forth in this Policy.

**20.7.** In case there has been indicated the dates on which the markets (in which the Company is listed) will not be open (ex: Saturdays, Sundays and Holidays), the operations must be carried out on the first working day following the date initially scheduled.

**20.8.** The IRO can refuse to file with the Company an Investment Plan that does not comply with this Policy or with the current legislation, and, when required, the IRO shall report to the Securities Commission the Investment Plans that have been filed with the Company.

**20.9.** The Board of Directors, or other body delegated by the Board of Directors, shall verify, at least semi-annually, if the trades by the participants are abiding to the Investment Plans that have been formalized by them.

## **21. Duties and Responsibilities of the IRO**

The responsibilities of the IRO include:

**(a)** disclosing and ensuring the wide dissemination of any Relevant Information related to the Company's business immediately after becoming aware of it;

**(b)** implementing and monitoring this Policy, as well as all communication between the Company, the CVM, and the Stock Exchange, and between the Company and other participants in the Securities Market;

**(c)** acting as the Company's main spokesperson on matters related to the Securities Market;

**(d)** responding promptly to competent authorities' requests for clarifications, corrections, additions, or further disclosures of a Relevant Act or Fact;

**(e)** receiving, with the support of the IR department, communication regarding the quantity, characteristics, and method of purchase of securities traded in the securities market, issued by the Company and its controlled or controlling companies, owned by the Covered Persons, as well as any changes in their positions, and transmitting such information to the CVM and the Stock Exchange;

**(f)** archiving, with the support of the IR department, the Subscription Terms signed by Covered Persons while they are affiliated with the Company, and for at least five years after their termination;

**(g)** reviewing the Individual Plans submitted in accordance with this Policy and forwarding the monitoring results of Individual Plans involving the trading of the Company's securities to the Board of Directors or the body delegated by it;

**(h)** communicating, with the support of the IR department, the beginning and end of Black-Out Periods, except for those previously mentioned in this Policy and foreseen by the applicable regulations; and,

**(i)** addressing any doubts related to this policy.

## 22. Breach of this Policy

**22.1.** The breach of this Policy will subject the offender to disciplinary sanctions, in accordance with the Company's internal rules, including the Code of Ethical Conduct and the Consequences Policy, as well as penalties applicable when the breach constitutes a serious infraction as defined by the CVM.

**22.2.** Furthermore, the use of undisclosed Relevant Information may be classified as a crime, subject to imprisonment and fines, pursuant to Article 27-D of Law 6,385/76.

## 23. Education

**23.1.** Periodically, mandatory training sessions shall be conducted to raise awareness and engage the Covered Persons regarding the guidelines and directions set forth in this Policy.

## 24. Final Provisions

**24.1.** The Board of Directors may, at any time, make amendments to this Policy, which shall be promptly communicated by the IRO to the Covered Persons, the CVM, and the Stock Exchange, taking effect on the date the amendments are acknowledged.

**24.2.** Any violations of the provisions of this Policy must be immediately reported to the Company's IRO.

**24.3.** Covered Persons responsible for violating any provisions of this Policy are required to reimburse the Company for any losses it incurs as a result of such breach.

**24.4.** The disaffiliation of a Covered Person from this Policy will occur automatically in the following cases:

- (a) resignation or dismissal from the position of director, member of the board of directors, or member of the fiscal council, as well as from any bodies with technical or advisory functions created by statutory provisions;
- (b) termination of the employment contract, in the case of employees; and,
- (c) death of an individual or dissolution of a legal entity.

## 25. Control information and those responsible for the preparation

Version	Date	Validity
1st version	06/14/2002	06/14/2002
2nd version	09/14/2009	09/14/2009
3rd version	04/19/2014	04/19/2014
4th version	11/10/2015	11/10/2015
5th version	12/09/2016	12/09/2016
6th version	06/28/2019	06/28/2019
7th version	11/10/2021	11/10/2021
8th version	12/14/2023	12/14/2023
9th version (Current)	12/12/2024	12/12/2024

Responsible	Area
Preparation	Corporate Governance
Review	Legal Department and Investor Relations Department
Approval	Board of Directors

## Attachment I - Adherence Agreement

[name], Taxpayer Registry Number (CPF) [xxx], [position], in the [company] as a Covered Person, provided that the provisions of the Resolution CVM no. 44/2021 are complied with, abides to the policies contained in this Policy on Disclosure of Material Acts or Facts and Trading of Securities relating to the securities issued by Randon S.A. Implementos e Participações, and DECLARES:

(a) to have full knowledge of the rules contained in the aforementioned Policies, which is available on the Company's site (<https://ri.randoncorp.com/>), and undertakes to comply with it and always guide his/her actions in accordance with such rules;

(b) to be aware of the black-out periods to trade predefined securities, prior to the disclosure of the Quarterly Statements (ITR) and Annual Statements (DFP) provided for in this Manual, and that such periods are established annually by the Company and its subsidiaries by means of the Annual Calendar of Corporate Events, available on the Company's website;

(c) be aware that, if identified as a source of information leakage, it is subject, when applicable, to the sanctions provided for in the Company's Code of Ethical Conduct and to other measures that the Company deems necessary to protect its interests and recover any damages, including reporting to the competent authorities;

(d) according to the terms of this Policy, the following are Related Persons:

Related Persons (Name)	Tax Payer Registry (CPF)	Relationship	
		Spouse/partner	
		Dependent (Income Tax Return)	
		Spouse/partner	
		Dependent (Income Tax Return)	
		Spouse/partner	
		Dependent (Income Tax Return)	
Associated Persons (Name)	Tax Payer Registry (CNPJ)	Relationship	
		Subsidiary	
		Trust agreement	
		Portfolio Administrator	
		Subsidiary	
		Trust agreement	
		Portfolio Administrator	

The Declarant authorizes the Company: (i) to access any information registered with the bookkeeper related to their transactions involving securities issued by the Company, their derivatives, or any other securities referenced by them; and (ii) to send to the Securities and Exchange Commission (CVM) information regarding the ownership and transactions involving securities issued by the Company, their derivatives, or any other securities referenced by them, whether by the Declarant, their spouse or partner, dependents included in their annual income tax declaration, and directly or indirectly controlled companies, in accordance with CVM Resolution 44/2021, and in compliance with the General Data Protection Law (Law No. 13,709, of August 14, 2018).

The Declarant executes this document through the digital platform usually used by the Company, for all legal purposes and effects.

[Place], [day] of [month] of [year].

[signature]

[Declarant's name]

## Attachment II - Model of Trading Report of Securities

Article 11 – CVM Resolution No. 44/2021

Month: \_\_\_\_\_ Year: \_\_\_\_\_

( ) the following transactions with securities and derivatives occurred, in accordance with Article 11 of CVM Resolution No. 44/2021.

( ) no transactions with securities and derivatives were made, in accordance with Article 11 of CVM Resolution No. 44/2021, and I hold the following positions in securities and derivatives.

Company's Name		Controlled	Controlling			
Name:		CPF/CNPJ:				
Full address:						
Intermediary Brokerage of Movements:						
Initial Balance						
Security	Characteristics of Securities	Quantity	% of interest			
			Class/Type	Total		
Movements						
Security	Characteristics of Securities	Operation	Day	Quantity	Price	Value (R\$)
		Purchase				
		Purchase				
		<b>Total Purchases</b>				
		Loan				
		Loan				
		<b>Total Loans</b>				
		Sale				
		Sale				
		<b>Total Sales</b>				
Final Balance						
Security	Characteristics of Securities	Quantity	% of interest			
			Class/Type	Total		



## Attachment III - Individual Investment or Divestment Plan

By means of this Individual Plan, ruled by the Trading Policy of Securities of the Company, I hereby commit to invest or disinvest Securities of the Company in compliance with the applicable legislation and laws provided in said Trading Policy, and also with the following conditions:

Holder`s Name of the Plan		
Company Name		
B3 Code of the security to be traded:		
Operation Nature:	( ) Investment/Purchase	( ) Disinvestment/Sale
Related Persons:	Name	CPF/CNPJ
Broker Intermediary:		
Trading Period:		
Dates or events and values designated or quantity of transactions	Dates/Events	Values/Quantities
Additional Information:		

By adhering to/signing this Investment Plan, I hereby commit to:

- (a) fulfilling the provisions established in it, in an irrevocable and irreversible manner, except for justified and legitimate reasons;
- (b) following the provisions of Resolution CVM44, of August 23, 2021;
- (c) in case of investments, not selling the Securities acquired through this Investment Plan for a minimum term of 6 (six) months) from the date of acquisition, except for force majeure reasons;
- (d) within the period of 5 (Five) days from the end of the month in which the acquisition or sale of securities occurred, providing information to the Company, as provided for in the Information Disclosure Policy;
- (e) return to the Company any avoided losses or gains derived from transactions with its shares, resulting from any changes in the dates of disclosure of quarterly financial statements and annual financial reports, if this Investment Plan includes transactions during the 15 (fifteen) days prior to such disclosure. The amount to be returned to the Company will be calculated by the difference between the average stock price on the date of the planned transaction, the original date of disclosure, and the day after the actual disclosure. In case of share purchases, if the acquisition on the planned date occurs before the effective disclosure date, when originally it would have occurred after, any positive price difference between the price after disclosure and the acquisition price will be returned to the Company (return of the gains made). In case of share sales, if the sale on the planned date occurs before the effective disclosure date, when originally it would have occurred after, any positive price difference between the sale price and the price after disclosure will be returned to the Company (return of avoided losses);

(f) not performing any operation to cancel or mitigate the economic effects of the operations determined in this Investment Plan.

*[location], [day] of [month] of [year].*

*[signature]*

*[name]*

*[position/Relationship with the Company]*

*[CPF]*

Received on:

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

*[name and signature of IRO]*

# RANDONCORP

Building Tomorrow

