ARTIFICIAL INTELLIGENCE POLICY

1.   OBJECTIVE

This Policy aims to establish the principles, guidelines, and responsibilities that govern the use, development, and management of Artificial Intelligence ("AI") systems at Randoncorp, ensuring ethical, transparent practices aligned with Brazilian and international legislation.

2.   APPLICATION AND SCOPE

This Policy applies to all systems, processes, and projects involving AI within Randoncorp, including branches, subsidiaries, suppliers, and national and international partners. It covers both internal activities and solutions offered to customers and third parties. In Randoncorp's controlled companies that have deliberative bodies, this Policy shall be submitted to the Board of Directors or its equivalent for acknowledgment and implementation.

3.   REFERENCES

- Randoncorp Code of Ethical Conduct.

- Information Security Policy.

- Personal Data Privacy Policy.

- Sanctions Policy.

- Regulation on the Use of Artificial Intelligence in the European Union (AI Act).

4.   DEFINITIONS

Artificial Intelligence ("AI"): a machine-based system designed to operate with varying levels of autonomy, capable of adapting after deployment, and which, with explicit or implicit objectives, infers from received inputs how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

Executive Committee (COMEX): a non-statutory body composed of C-level executives, responsible for executing Randoncorp's AI strategy.

AI Process Owner: professional responsible for managing, supervising, and ensuring end-to-end performance of AI processes within the Company.

5.   GUIDELINES

The adoption of AI at Randoncorp must always consider ethical, social, and regulatory impacts associated with the technology. Guidelines include alignment with corporate strategy, compliance with applicable legal frameworks, and fostering innovation with responsibility and sustainability. AI projects must be conducted with transparency, accountability, and respect for individual rights.

5.1 Guiding Principles

- **Ethics and Integrity**

  AI use at Randoncorp must respect ethical values, fundamental rights, and the Randoncorp Code of Ethical Conduct, preventing abusive practices, negative impacts, and discrimination. All automated decisions must be based on integrity and corporate responsibility.

- **Transparency and Explainability**

  AI systems must operate clearly and comprehensibly, enabling employees, customers, and stakeholders to understand the criteria and logic behind automated decisions. Documentation of processes and models must be accessible for audit and communication.

- **Traceability and Auditability**

  All relevant stages of the AI lifecycle—from development to operation—must be recorded, allowing reconstruction of decisions and accountability. Records must enable internal and external audits, as required by regulatory and corporate standards.

- **Effective Human Oversight**

  Human oversight is mandatory in critical processes, especially those impacting rights, safety, or compliance. Automated decisions must be reviewable by qualified individuals, with the possibility of intervention and reversal when necessary.

- **Security, Robustness, and Resilience**

  AI systems must be designed and operated with security mechanisms, robustness testing, and incident response plans to prevent failures, cyberattacks, and misuse. Operational resilience is essential to ensure continuity and trust.

- **Data Protection and Privacy**

  Personal data processing in AI solutions must comply with LGPD and other applicable regulations, ensuring confidentiality, integrity, minimization, and respect for data subjects' rights. Integration with Randoncorp's privacy and information security policies is mandatory.

- **Strategic Alignment and Corporate Responsibility**

  Randoncorp will define priorities for AI use, ensuring all initiatives align with its strategy, values, and corporate objectives. AI must contribute to responsible innovation, operational efficiency, and sustainable value generation for Randoncorp, customers,

employees, and society.

The Executive Committee is responsible for defining corporate strategy and setting AI application guidelines. Operationalization occurs through the Brain Program, the corporate program responsible for comprehensive AI governance—from opportunity identification to execution—ensuring productivity and efficiency gains in operational and administrative processes.

- **Proportionality and Risk Management**

Controls and requirements applied to AI systems must be proportional to the risk involved in each use case. High-impact projects require formal assessments, independent validations, and approval by appropriate governance bodies.

- **User Rights and Contestability**

Accessible channels must exist for users, customers, or employees to question, review, and contest automated decisions affecting them, ensuring transparency, due process, and timely responses.

5.2 Guidelines Applied to the AI Lifecycle

- **Assessment and Approval**

All developments and acquisitions of digital solutions with embedded AI must be communicated and submitted for approval by the IT Architecture and Governance Committee before any implementation or supplier contract. IT Governance ensures alignment with strategic objectives, security, and efficiency. Suppliers must adhere to Randoncorp's guidelines.

- **Development or Acquisition**

AI solutions must be designed or contracted in compliance with technical criteria.

- **Deployment and Integration**

Solutions must undergo technical and operational validations. Continuous monitoring is mandatory. All involved parties must receive adequate training on the technology, its risks, and limitations, ensuring responsible and informed use.

- **Operation and Continuous Monitoring**

All business areas must monitor and audit implemented solutions. Activity monitoring tools may be used to prevent misuse and obsolescence.

- **Review and Learning**

Employees must provide continuous feedback on system operation. Issues or inconsistencies must be reported. Ongoing team training ensures adaptation to best practices and evolving regulations.

6. RESPONSIBILITIES

Board of Directors

- Formally approve this AI Policy and its updates, ensuring adherence to Randoncorp's ethical, legal, and strategic principles;
- Oversee strategic risks, including those related to AI, within the corporate risk map, addressing them in appropriate committees.

Executive Committee

- Direct and support the activities of the Corporate AI Committee, ensuring effective governance and integration of involved areas.

Corporate AI Committee

- Establish standards for appropriate AI use aligned with company processes and product requirements;
- Define a clear approval flow for AI projects, including review and validation stages;
- Conduct ethical and technical evaluations of AI solutions before contracting or implementation, ensuring technology aligns with company values and operational requirements;
- Promote periodic reviews to maintain compliance with best practices and evolving regulations;
- Ensure employees receive adequate training on responsible and ethical AI use, as well as internal policies and procedures.

IT Architecture and Governance Committee

- Review and approve AI projects before implementation, ensuring alignment with company strategic objectives and compliance with internal policies.

AI Process Owner

- Oversee AI use, ensure respect for rights, and ensure compliance and accountability for automated decisions.

Managers and Leaders

- Ensure AI adoption aligns with Randoncorp's strategic objectives, identifying how technology can add business value, improve efficiency, and create competitive advantages, while ensuring performance expectations are clear and achievable.

Employees and Interns

- Understand and comply with company policies, guidelines, and procedures for AI use and contracting, ensuring all actions adhere to ethical, legal, and operational standards.

7. GENERAL PROVISIONS

This AI Policy establishes guidelines for the responsible and ethical use of AI solutions within Randoncorp. All employees must understand and apply these guidelines in their activities, promoting transparency, security, and data protection. Non-compliance

may result in disciplinary measures.

8.   CONTROL INFORMATION

This Policy was approved by the Board of Directors on December 11, 2025, and became effective on the same date.

Document Owners:

Development	**Review**	**Approval**
Corporate AI Committee	Risk Management and Compliance	Board of Directors

Version	RCA	Date	Changes
1st	1020	12/11/2025	