

RANDONCORP

Building tomorrow



Policy of Disclosure Information and Trading of Securities

8th Version
Approved on 12/14/2023

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1. Purpose

This Policy aims to (i) discipline the use and disclosure of Material Information within the scope of the Company and its subsidiaries and (ii) provide guidance on the rules for trading securities issued by the Company and its subsidiaries, publicly-held companies, and derivatives referred to therein.

2. Scope

This Policy applies to:

- (a) the Company itself.
- (b) controlling shareholders, direct and indirect.
- (c) board of directors members.
- (d) statutory and non-statutory officers, the latter also defined as Employees.
- (d) supervisory board members, if installed.
- (e) members of any bodies with technical and consulting functions created by statutory provisions. and,
- (f) to other persons that the Company, at its discretion, deems relevant for the purposes of this Policy and who have undertaken in writing the duty to comply with it, including third parties hired by the Company who have permanent or occasional access to Relevant Information, or any persons who may be aware of Relevant Information due to a commercial, professional or trust relationship with the Company or due to a position or function in the Company, its Parent Company or its Subsidiaries.

3. References

- Federal Law 6,385/1976, provides for the securities market and creates the Securities and Exchange Commission.
- Federal Law 6,404/1976, provides for Joint Stock Companies.
- Securities and Exchange Commission Resolution 044/2021, provides for the disclosure of information on a Material Act or Fact, the trading of securities pending an undisclosed Material Act or Fact, and the disclosure of information on the trading of securities.
- CVM Resolution 80, of March 29, 2022, provides for the registration and provision of periodic and occasional information on issuers of securities admitted to trading on regulated securities markets.
- Brazilian Code of Corporate Governance – Publicly-held Companies, edited by the Brazilian Institute of Corporate Governance (IBGC).
- Regulation of Level 1 of Corporate Governance of the Brazilian Stock Exchange (B3 S.A., Brasil Bolsa Balcão).
- Company's By-laws.
- 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: the members of the Board of Directors and the Executive Board, elected at the General Meeting or by the Board of Directors, acting in their own name or in the Company's name.

Investor Relations Area: It is the Company's department that works to support the Investor Relations Officer, in order to comply with this Policy.

Material Fact or Act: any decision made by a controlling shareholder, resolution by the General Meeting or management bodies of the Company, or any other act or fact of political administrative, technical, trading or economic-financial nature which has taken place or is related to the business of the Company which may substantially affect: (i) the price of the securities of the Company or related securities. (ii) investors' decision to buy, sell or hold such securities. and (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 relevant acts or facts can be found in Article 2, sole paragraph, of Securities and Exchange Commission Resolution (RCVM) 44.

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

Employees: they are the non-statutory officers and other employees of the Company or its Subsidiaries.

Company: Randon S.A. Implementos e Participações.

Notice to the Market: is the instrument by which the Company will disclose any information that is not conceptually Relevant Information, under the terms of RCVM 44, but which the IRO deems useful to make known to investors and market participants, even if its disclosure is not required by law and current regulations.

Members of the Advisory Board: the members of the Advisory Board of the Company, sitting or substitute members, whenever the Board is installed during shareholders' general meeting.

Accredited Brokerage Firm: the securities broker accredited by the Company to trade the securities by the Covered Persons.

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: information related to the Company, or to a Company of the same economic group, which may substantially affect the price of the securities, not yet disclosed to the public.

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

Bodies with Technical and Consulting Functions: the bodies of the Company created by statutory provisions, with technical functions or in place 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, administrators, advisory board members, members of any bodies with technical or consulting functions created by statutory provisions, and, also those who, due to their functions or positions in the Company or in its subsidiaries, controlling company or other companies under common control, may hold Material information on the Company.

Related Persons: persons who maintain the following links with the Covered Persons: (i) the spouse from whom they are not judicially or extrajudicially separated. (ii) the partner. and, (iii) any

economic dependent included in the annual income tax return. and, (iv) companies directly or indirectly controlled by the Covered persons or by the persons mentioned in items “i”, “ii” and “iii” above.

Individual Investment Plan or Divestment or Individual Plan: the Company’s own trading programs provided in Article 16 of the RCVM 44, by which the Company and the “Covered Persons” have indicated their commitment to invest or disinvest with their own funds, in the long term, securities issued by the Company.

Control: Power effectively exercised to conduct social activities and provide guidance for the functioning of the Company’s bodies, directly or indirectly, based on facts or on the law. There is a relative presumption of control for the shareholder or group of shareholders that hold shares that permanently, directly or indirectly, guarantee the majority of votes in the resolutions of the meetings and the power to elect the majority of the Company’s managers.

Resolution CVM 44 or RCVM 44: CVM Resolution No. 44, of August 23, 2021, which revoked CVM Instructions No. 358, of January 3, 2002; nº 369, of June 11, 2002; and, No. 449, of March 15, 2007, and provides for the disclosure of information on a Relevant Act or Fact, the trading of securities pending disclosure of a Relevant Act or Fact and the disclosure of information on the trading of securities.

Affiliate Companies: companies over which the Company has influence on its management, without controlling them.

Subsidiary Companies: companies which are directly or indirectly controlled by the Company.

Third Party: 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.

Term of Adhesion: formal instrument, provided for in Article 17, § 1 of Instruction RCVM 44, to be signed by the Covered Persons, through which they express their awareness of the rules of this Policy, assuming the obligation to comply with them and ensure so that the rules are enforced by people who are under their influence.

Securities: shares, debentures, subscription bonus, receipts and subscription rights, promissory notes, purchase options or indexes and derivatives of any kind, or other securities or collective investment contracts issued by the Company which, by legal determination, are considered securities.

5. Guideliness

5.1. All Covered Persons shall act in accordance with the values of good faith, loyalty, and truthfulness, as well as 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 makers in the Securities market must be uniform, transparent, and equitable.

5.3. Covered Persons must ensure that the disclosure of information by the Company is correct, complete, timely and developed by the managers responsible for this function, as provided for in this Policy and in the applicable regulations.

5.4. The responsibility of the Covered Persons will extend to the acts performed by third parties, whenever they act under their influence, guidance, or delegation. However, the content of this Policy does not exempt the liability of third parties not directly connected to the Company, who are aware of Material Information and will trade Securities pending the disclosure of Material Act or Fact.

6. Purpose of Disclosing Material Information

The disclosure of Related Acts or Facts intends to assure investors of the availability, in due course and in an efficient and reasonable manner, of the information they need to make their investment decisions, thus ensuring the best possible symmetry when disclosing information, and thus preventing the improper use of Material Information in the stock market, by people who have access to it, either for their own advantage or for third parties' advantages.

7. Rules for Disclosure of Relevant Information

7.1. It is IRO's responsibility to analyze the relevance of information that may consolidate Material Acts or Facts, within the context of the ordinary activities and dimension of the Company's business, disclosing, if deemed pertinent, the information to the market in a clear and precise manner and ensuring its wide and simultaneous dissemination.

7.2. If the Covered Persons understand that they hold information that may substantiate a Material Act or Fact not yet disclosed to the market, they must report it to the IRO, who will be responsible for deciding on its characterization. In case of doubt, IRO may consult the members of the Board of Directors.

7.3. If the Material Fact or Act is not to remain undisclosed, as in certain cases provided by law, and even so the IRO fails to disclose it, the Covered Persons will only be exempt from responsibility if they immediately notify the Material Act or Fact to CVM.

7.4. In meetings with trade associations or entities, investors, analysts, or selected members of the public, concerning matters that may be deemed as a Material Act or Fact, the IRO or another person appointed for this purpose shall be present, or the content of such meetings shall be reported to the IRO, so it can be simultaneously released to the securities market.

8. Forms and deadlines for disclosing information

8.1. The disclosure of a Relevant Act or Fact must be:

(a) preferably before the start or after the close of trading on the Stock Exchange, in order to avoid delays in the start of trading, if disclosure is required before the opening of the trading session.

(b) communicated simultaneously to CVM and to the market, by a specific system, describing the acts and/or facts that occurred.

(c) made available on the Company's Investor Relations website. and

(d) made available in at least 1 (one) news portal with a page on the world wide web, duly identified in the Company's Registration Form, which provides, in a section available for free access, the information in its entirety.

8.2. If disclosure is imperative during trading hours, the IRO may do so and simultaneously request the suspension of trading in the Company's securities, for the time necessary for 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. Controlling shareholders, direct or indirect, and shareholders who elected members of the Board of Directors or the Fiscal Council, as well as any natural or legal person or group of persons, acting together or representing the same interest, who carry out relevant business, must forward to the IR, communication containing the information required by RCVM 44, immediately after reaching the following levels.

11.2. The business or set of businesses through which the direct or indirect participation of these persons exceeds or decreases, 5% (five percent), 10% (ten percent), 15% (fifteen percent), or multiples of this percentage, of the shares of the same type, representing the capital stock, is considered relevant.

11.3. The IR, in addition to keeping on file the proof of sending and receiving the messages exchanged about the transactions carried out, must, as soon as it receives the communication of acquisition or sale of a relevant stake, through a specific system, forward it to CVM and the Stock Exchange.

11.4. In the case of acquisition of shareholding that results or has been carried out with the purpose of changing the composition of the control or the administrative structure of the Company, or if the acquisition generates the obligation to carry out a public offering, under the terms of the applicable regulation, IRO must also promote its disclosure, under the terms of this Policy.

12. Disclosure of information in public offerings

12.1. Immediately after the decision to carry out a public offer that depends on registration with the CVM, the offeror must forward to the IRO, information regarding the quantity of securities to be acquired or disposed of, the price, payment terms and other conditions to which it is subject to offer, so that it proceeds with its disclosure to the market, except in the case of a confidential analysis procedure, pursuant to current regulations.

12.2. The primary or secondary public distribution of securities should only be disclosed when it meets the criteria set forth in items I to II of Article 2 of the RCVM 44.

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

13.1. The administrators, fiscal council members and members of bodies with technical or advisory functions created by statutory provision, are obliged to inform the IR of the ownership and the negotiations carried out with securities issued by the Company and its controlled public companies, as well as the negotiations with derivatives, or other securities referenced to those issued by the Company and its subsidiaries.

13.2. When they are natural persons (individuals), the persons mentioned in the item above must also indicate the securities that are owned by the Related Persons.

13.3. The communication must have the information contained in the model attached to this Policy, identified as Attachment III, and the respective brokerage notes may also be sent, on the first business day after taking office and within 5 (five) days after the performance of each business.

13.4. The IR team will send the information to CVM and the Stock Exchange, within 10 (ten) days after the end of the month in which the changes in the positions held are verified, of the month in which the office of administrators and supervisors takes office, or the month you receive the communication.

13.5. The communications mentioned in this item must contemplate the ownership of shares, and such declaration must also detail the portion of shares held by the communicating party that has been acquired or disposed of through a share loan.

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 does not consist of historical facts, but reflects the goals and expectations of the Board of Directors of Randon S/A. Implementos e Participações. The words “anticipates”, “wishes”, “expects”, “forecasts”, “intends”, “plans”, “foresees”, “estimates”, “hopes” and similar words, whether written and/or spoken, seek to identify statements that necessarily involve known or unknown risks. Forward-looking statements and information are not guarantees of performance, they involve risks, uncertainties and assumptions because they refer to future events, depending, therefore, on circumstances that may or may not occur.

Future results and the creation of shareholder value may differ materially from those expressed or suggested by forward-looking statements. Many factors that will determine these results and values are beyond the Company's management's ability to control or predict. The Company reserves the right not to update this presentation upon new information or future events. The Company does not hold responsibility for operations or investment decisions made with basis on the information contained in this presentation.

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 undue disclosure of insider, confidential and material information to the press and to third parties, in disagreement with this Policy, jeopardizes the strategic interests of the Company, as it may lead to asymmetry of information on the market and, by as a result, lead to the violation of the Law and regulations applicable to the Company, including the RCVM 44.

16.2. The Covered Persons must be aware that the Company has in place appropriate procedures and channels for interaction with the media, shareholders, market analysts and other stakeholders, being the IRO responsible for the decisions related to the treatment of information that may characterize a material act or fact.

16.3. Considering the relevance of the theme, the Company adopts internal procedures aimed at ensuring the confidentiality of such information, such as: (i) continuous monitoring of electronic mail. and, (ii) strengthening the commitment of the Covered Persons in preserving the confidentiality of the information.

17. Improper use of Material Information (Insider Trading)

17.1. The use of Material Information not yet disclosed is prohibited, by any person who is aware of it, with the purpose of obtaining an advantage for themselves or for another person, through trading in the Company's securities.

17.2. Subject to the exceptions provided for in RCVM44, for the purpose of characterizing the tort above, it is assumed that:

(a) any person who has traded securities with Material Information made use of such information in said trade.

(b) Direct and indirect Controlling Shareholders, Officers, members of the Board of Directors, members of the Fiscal Council and the Company itself, in relation to businesses with its own securities, have access to all Material Information.

(c) the persons mentioned in item "b" and those who have a commercial, professional or trust relationship with the Company, when they have access to Material Information, know that this is privileged information.

(d) the board members, fiscal council members or executives who leaves the Company with Relevant Information uses this information if he/she trades securities issued by the Company within a period of 3 (three) months after his/her dismissal, or until the disclosure, by the Company, of the Act or Fact relevant to the market of which they were aware, whichever occurs first. and,

(e) as from the moment studies or analysis of the matter begin, the following are relevant: (i) information on mergers, spin-offs, transformations or any form of corporate reorganization or business combination. (ii) change in the Company's control. (iii) decision to cancel the registration as a publicly-held company or change the trading segment of the Stock Exchange. and, (iv) request for judicial or extrajudicial recovery and bankruptcy filed by the Company.

18. Securities Trade Prohibition

18.1. The Company and the Covered Persons are prohibited to trade any security issued by the Company or by its subsidiaries, when these latter are publicly-held companies, in the following events:

(a) within a period of 15 (fifteen) days prior to the disclosure date of the quarterly accounting information of the Company's annual financial statements. The prohibition does not depend on knowledge of the content of such information, as well as the assessment as to the existence of Material Information pending disclosure or the intention in relation to the negotiation. The counting of the referred period must be done excluding the day of disclosure, however trading with securities can only be carried out on that day after said disclosure. and,

(b) in the period between the date on which they became aware of the Material information (Material Act or Fact) and the date on which such information is disclosed to the market.

18.2. When the IRO verifies the existence of Material Information not disclosed, regardless of any justification, it may set a Black-out Period, in which the Covered Persons may not trade securities issued by the Company and/or its Subsidiaries and they must also give confidentiality to the subject. The Black-out Periods will be published by IR team, which will indicate the starting date and will last until a new notice is issued informing the end.

18.3. The prohibition on trading provided for in item 18.1 does not apply, if and when applicable, in the other situations provided for in RCVM 44.

19. Exceptions to Trading Prohibition

The prohibitions established in this Trading Policy do not apply to the Covered Persons when:

- (a)** it refers to private trading among the Covered Persons, deemed as such those carried out outside Stock Exchanges.
- (b)** operations aimed at fulfilling obligations assumed before the beginning of the Prohibition Period arising from loans of securities, exercise of call or put options by third parties and forward purchase and sale contracts.
- (c)** the trades are carried out by investment funds of which the Covered Persons are quota holders, provided that said funds are neither exclusive investment funds or funds whose portfolio manager's trading decisions are influenced by the Covered Persons. and,
- (d)** negotiations involving fixed-income securities, when carried out through operations with combined commitments of repurchase by the seller and resale by the buyer, for settlement on a pre-established date, before or equal to the maturity of the securities object of the operation, carried out with profitability or remuneration parameters presets.

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 operation is carried out only after 3 (three) months of its presentation, as well as its modifications or cancellations.
- (b)** the nature of the scheduled operations, whether purchase or sale.
- (c)** the dates and the approximate values or amounts of trades to be made.
- (d)** the validity term, which shall not be shorter than 12 (twelve) months.
- (e)** the identification of the securities brokers which will mediate the trades.
- (f)** the identification of the Related and Associated Persons. and
- (g)** in case of investments, the commitment not to selling the securities acquired in the scope of the Investment Plan earlier than 3 (three) months from the last date of acquisition, except in event of force majeure events.

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. On the expiry of the Investment Plan, a new Plan can be submitted to the Company, in which case all the requirements set out in this Policy shall be met.

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. Accredited Brokerage Firm

21.1. In order to assure proper trading standards of the Securities issued by the Company and its subsidiaries all trading transactions by the Covered Persons shall only be carried out by an Accredited Brokerage Firm.

21.2. The Accredited Brokerage Firm will send a monthly report with the transactions of the Covered Persons, so that the Company can verify their adherence to and compliance with this Policy and, in case of non-compliance, provide the appropriate referral.

21.3. Through the Adhesion Term, the Covered Persons will be notified of the Accredited Broker, and the Company will be responsible for making new communication whenever there is a replacement.

21.4. The Covered Persons who have open positions involving securities of the Company, shall transfer such positions to the Accredited Brokerage Firm within 60 (sixty) days, counted from the date of taking office or from the date of signature of the Adhesion Agreement. Exceptional situations must be submitted to IRO's prior approval

22. Duties and Responsibilities of the IRO

The responsibilities of the IRO are:

(a) Disclose and endeavour to ensure the extensive dissemination of any Material Act or Fact related to the Company's business, immediately after he/she becomes aware of it.

(b) Promote the execution and monitoring of the Policies contained in this Manual and handle all communications among the CVM (SEC), the Stock Exchanges and further members of the Securities Market.

(c) Act as the main spokesperson of the Company in matters pertinent to the Securities Market.

(d) Promptly respond to any requests (that may come from the competent bodies) for additional clarification, corrections, amendments or republication of Material Acts or Facts.

(e) Receive information on the quantity, characteristics, and method of acquisition of securities being traded in the securities market, issued by the Company and by controlled or controlling

companies listed on stock exchanges, where the Covered Persons hold securities, as well as any change in their positions, and disclose such information to CVM and Stock Exchanges.

(f) evaluate the Individual Plans, presented in accordance with this Policy and forward to the Board of Directors or body delegated by it, the results of monitoring the Individual Plans that involve trading in securities issued by the Company.

(g) communicate, with the support of IR Team, the beginning and end of the Blackout Periods (black-out period), except for those previously mentioned in this Policy and provided for in the applicable regulations. and,

(h) Clear any questions related to this Policy.

23. Breach of this Policy

23.1. The breach of the Policy will subject the offender to disciplinary measures, pursuant to the internal rules of the Company, including the Code of Ethical Conduct and the Consequences Policy, and it will also be a serious violation for the purposes of paragraph 3, of Article 11, of Law 6,385/76.

23.2. Furthermore, using information about a Material Act and Fact that has not been published may be a crime subject to imprisonment and fine, pursuant to Article 27-D of Law 6,385/76.

24. Education

Periodically, mandatory training must be carried out to raise awareness and engagement of Covered People, in relation to the guidelines contained in this Policy.

25. Final Provisions

25.1. The Board of Directors may, at any time, make changes in this Policy. Such changes shall be promptly informed by the IRO to the Covered Persons, CVM and Stock Exchanges and shall become effective to all at the date on which they become aware of such amendments.

25.2. Any violation of this Policy by the Covered Persons shall be immediately informed to the Company's IRO.

25.3. The Covered Persons who do not comply with the provisions contained in this Policy shall compensate the Company for all losses that the Company may have as a result of such noncompliance.

25.4. The dissociation of a Covered Person from this Policy will automatically take place in the following cases:

- (a)** resignation or removal from the position of Officer, Board of Directors members, Advisory Board member, and/or from any other bodies with technical or consulting functions created by statutory provision.
- (b)** termination of the employment contract, in the case of employees employed. and,
- (c)** the death of the natural person or extinction of the legal entity.

26. 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 (valid)	12/14/2023	12/14/2023

Responsible	Area
Elaboration	Corporate Governance
Revision	Corporate Legal Director
Approval	Investor Relations Officer

Attachment I - Statement of Compliance

[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) to be aware that the Accredited Brokerage Firm is _____

(e) that the Related Persons and Associated Persons, pursuant to this Manual, are the following ones:

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 bookkeeping bank, which refers to its trading with securities issued by the Company, its derivatives or any other securities referred to therein. and (i) the Company to send to the Brazilian Securities Commission (CVM) information regarding the ownership and negotiations carried out with securities issued by the Company, its derivatives or any other securities referenced therein, whether of the Declarant, his spouse or partner (a), dependent included in their annual income tax return and directly or indirectly controlled companies, pursuant to CVM Resolution 44/2021.

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

Caxias do Sul, [Month and date] [year].

[Signature]

[Declarant's name]

Attachment II – Model of Trading Report of Securities

Article 11 – Resolution CVM No 44/2021

On _____ / _____ (Date)

() only the following operations with securities and derivatives have been performed, according to Article 11 of the Resolution CVM No 44/2021/002.

() operations with securities and derivatives have not been performed, according to Article 11 of the Resolution CVM No 44/2021. My current position of securities and derivatives is as follows:

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					
		Total Purchases					
		Loan					
		Loan					
		Total Loans					
		Sale					
		Sale					
		Total Sales					
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:	<input type="checkbox"/> Investment/Purchase	<input type="checkbox"/> Disinvestment/Sale
Related and Associated Persons:	Name	CPF/CNPJ
Securities brokers mediating the operation:		
Plan Validity Term:		
Dates and values or amount of trades to be made	Dates	Amount/quantity
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) revert to the Company, any losses avoided or gains earned in trading with shares issued by the Company, arising from any change in the disclosure dates of the quarterly accounting information and annual financial statements, if this Investment Plan includes negotiations within a period of 15 (fifteen) days that precede its disclosure. The amount to be reverted to the Company will be determined by the difference between the average price of shares quoted on the Stock Exchange on the trading date provided for in the Investment Plan, on the original disclosure date and on the day following the effective disclosure date. In case of purchase of shares, if the acquisition on the date provided for in the Investment Plan occurs before the effective date of disclosure, when the original date would occur later, any positive difference in the average quotation between the value after the disclosure and the acquisition value will be reversed to the Company (reversal of earned earnings). In case of sale of shares, if the disposal on the date provided for in the Investment Plan occurs before the effective date of disclosure, when the original date would occur later, any positive difference in the average quotation between the disposal amount and the amount after disclosure will be reverted to the Company (reversal of avoided losses).

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

Caxias do Sul, *[Month and date]* *[year]*.

[Signature]

[name]

[position/ relationship with the Company]

[CPF]

Received on:

Date: ____/____/____

[name and signature of IRO]

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