



COMPLIANCE POLICY

1. OBJECTIVE

Establish Compliance guidelines and practices to maintain activities integrity and strengthen the ethical culture at Randoncorp.

2. APPLICATION AND SCOPE

This Policy applies to all Randoncorp, and third parties related to this company's activities.

3. REFERENCES

- Randoncorp's Code of Ethical Conduct.
- Anti-Corruption Policy.
- Risk Management Policy.
- ABNT NBR ISO 19600:2014 – Compliance Management System – Guidelines.

4. DEFINITIONS

Managers and Employees: any person with a statutory or employment relationship with the Company, as well as interns and young apprentices.

Compliance: comply with all legal obligations, maintain ethical values and establish control systems to ensure compliance.

Randoncorp: Company, Randon S/A Implementos e Participações, its subsidiaries and affiliates, whether directly or indirectly.

Compliance Risk: effect of uncertainty on compliance objectives, characterized by the impact and probability of non-compliance with company's obligations.

5. INTEGRITY PROGRAM

The Randoncorp Integrity Program (ID Randoncorp) should strengthen the company's values and principles. To this end, the Compliance process establishes activities to meet the needs of managing regulatory risks, interacting with processes, maintaining a culture of integrity and continuous improvement of the Compliance management system in an effective and agile way, considering the following governance principles:

- Reporting directly to the Board of Directors;
- Independence from the Compliance function;
- Adequate resources for the Compliance function.

6. COMPLIANCE ACTIVITIES

In order to comply with compliance activities, Compliance risk management resources must be maintained with the following minimal considerations:

- **Code of Ethical Conduct:** document that must establish guidelines for the performance of managers and employees, describing the standards of behavior and ways of acting, in accordance with the mission, ethical values and objectives of the Company.
- **Corporate Policies:** documents that should guide the Company's decisions and act as guidelines to give consistency to the strategies of Randoncorp's.
- **Ethics Channel:** means of communication that must capture reports of situations that do not comply with ethics and guidelines of Randoncorp's.
- **Compliance Due Diligence:** activity that must identify Compliance risks in contracting suppliers and service providers.
- **Due Diligence Monitoring:** supervision activity of third parties after hiring, especially those considered high risk.
- **Communication and training:** action that should strengthen the ethical culture through an annual communication and internal training.

7. RESPONSIBILITIES

Board of Directors

- Approve the Compliance policy.
- Approve the Code of Ethical Conduct and corporate policies.
- Ensure adequate resources for the Compliance function.

Ethics Committee

- Support the execution of the Integrity Program for Randoncorp's, encouraging the commitment of senior executives and sponsoring the actions of the Compliance management system.

- Ensuring that the Compliance management system is applied in the Company's processes.
- Monitor the execution of the Integrity Program, participate in decisions regarding deviations involving the Senior Management of Randoncorp, and when requested, participate in deliberations on critical non-compliance committed by managers and employees.

Risk Management and Compliance Area

- Manage and establish the activities of the Integrity Program for Randoncorp based on the best practices of the Compliance management system practices.
- Periodically provide training related to the Integrity Program, applicable to managers and employees, and service providers physically allocated to the Company.
- Promote the inclusion of Compliance responsibilities in job descriptions and employee performance management processes.
- Establish and monitor compliance performance indicators.
- Provide objective advice to the organization on Compliance-related issues.

8. CONTROL INFORMATION

This Policy was approved by the Board of Directors on November 07, 2017, and has been effective since August 2017.

Responsible for this document:

Author	Review	Approval
Risk Management and Compliance Area	Ethics Committee	Board of Directors

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