



## **SANCTIONS POLICY**

## 1. OBJECTIVE

Establish guidelines to support the management of sanctions and the identification of violations of the Code of Ethical Conduct, Randoncorp's internal rules, and current legislation.

## 2. APPLICATION AND SCOPE

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

In Randoncorp's subsidiaries that have deliberative bodies, this Policy shall be submitted to the Board of Directors or its equivalent for recognition and implementation.

## 3. REFERENCES

- Randoncorp's Code of Ethical Conduct
- Anti-Corruption Policy
- Compliance Policy

## 4. DEFINITIONS

**Compliance:** complying with all legal obligations, maintaining ethical values and establishing control systems to ensure compliance.

**Infraction of a legal or contractual nature:** corresponds to the violation of the employee's duties and obligations arising from the employment contract, company's policies and rules, and legislation.

**Infraction:** any action or omission that is in disagreement with the principles and commitments of the Code of Ethical Conduct, with integrity mechanisms, with internal policies and procedures and with legal obligations.

## 5. SANCTIONS MANAGEMENT PRINCIPLES

In applying this sanctions policy and its disciplinary measures, the following principles must necessarily be observed:

**Transparency:** the entire procedure, either directly or indirectly, related to the application of sanctions by Randoncorp must be guided by clarity, with the circumstances and information defined in their entirety and duly recorded.

**Integrity:** when participating, either directly or indirectly, in the application of company's sanctions, those involved must maintain their integrity and always act in the best interests of the company, avoiding contradictory or dubious conduct or anything that may harm the Company's reputation, credibility or image.

**Compliance:** any sanction applications must comply with the principles and guidelines of the Randoncorp's Code of Ethical Conduct, its internal rules, and the laws, regulations and rules in force that are applicable to the relationships maintained by the Company.

## 6. GUIDELINES

### 6.1 CODE OF ETHICAL CONDUCT VIOLATIONS

The measures, in case of violation of the Code of Ethical Conduct of Randoncorp and/or rules and laws related thereto, must be applied both to procedural errors and misconduct. Below, in this policy, we describe possible violations of the Company's Code of Ethical Conduct that identified parties will be subject to sanctions. However, the application of disciplinary measures is not limited to these violations.

- i. Failure to comply with the standards of conduct established in Randoncorp's Code of Ethical Conduct.
- ii. The practice of any act of corruption or fraud.
- iii. Not forwarding situations that could be considered conflicts of interest to the established channels.
- iv. Misuse of the Ethics Channel or acting in bad faith when reporting.
- v. Obtaining personal benefits for third parties arising from their function or position held in the Company.
- vi. Recruiting, selecting or promoting a professional based solely on personal or emotional bonds.
- vii. Offering gifts that do not comply with current regulations, that represent a conflict of interest, or that may influence any decision.
- viii. Defrauding a bidding process or administrative contract entered into with the government.

- ix. Make donations or contributions to political parties, political campaigns and/or candidates for public office on behalf of Randoncorp.
- x. Make political statements in favor or against political parties, political campaigns and/or candidates for public office on behalf of Randoncorp.
- xi. Make political statements in favor or against political parties, political campaigns and/or candidates for public office during working hours or in the work environment.
- xii. Making or accepting inappropriate, ambiguous or fraudulent accounting entries that may conceal or otherwise cover up illegal payments.
- xiii. Using an accounting procedure, technique or artifice to hide or cover up illegal payments.
- xiv. Not complying with sponsorship guidelines, as well as violating or defrauding the established procedure for granting sponsorships and donations.
- xv. Select suppliers based on criteria that are not fair, legal or technical, or that are in clear non-compliance with labor, tax, environmental or anti-corruption legislation.
- xvi. Position oneself as a representative of Randoncorp in negotiations, with professional associations, without being the designated and authorized professional for this function.
- xvii. Not complying with specific health and safety rules, not using protective equipment when necessary, or not expressing yourself in the event of a risk to the physical integrity of any person in the work environment.
- xviii. Consuming or being under the influence of alcohol or drugs in the company area or while in service.
- xix. Not performing attributions related to the position or functions provided for in the contract, unjustifiably.
- xx. Unjustified non-compliance with the working hours agreed upon with Randoncorp.
- xxi. Practicing any form of physical or verbal violence, or any other act that could be considered discrimination, moral or sexual harassment or abuse of power.
- xxii. Sharing confidential or private information related to Randoncorp.
- xxiii. Not properly caring for or misusing Company equipment, machinery or resources.
- xxiv. Use of assets belonging to Randoncorp for non-professional purposes.
- xxv. Harming the image of Randoncorp by disclosing the brands inappropriately, without authorization or by issuing negative opinions about the Company.
- xxvi. Not complying with applicable internal environmental laws and regulations.
- xxvii. Refusing to participate in mandatory periodic training promoted by Randoncorp.
- xxviii. Perform any act that constitutes a violation of the protection of personal data;
- xxix. Using Randoncorp's equipment for illicit activities;

- xxx. Anti-competitive conduct (examples: cartels, tying, predatory pricing, discrimination against clients or suppliers).

## 6.2 TYPES OF SANCTIONS

### 6.2.1 For the employees of Randoncorp

**Verbal Warning:** is a verbal warning to the employee, so that they are aware that their attitudes and/or behaviors are not in accordance with the guidelines and/or applicable laws in force. This is the first disciplinary measure to be applied when a legal and/or contractual infraction occurs, observing the seriousness of the infraction.

**Written Warning:** is a written warning to the employee, so that they are aware that their attitudes and/or behaviors are not in accordance with the guidelines and/or applicable laws in force. Applied in cases of repeated infraction of the same nature or for the first infraction, observing its seriousness.

**Disciplinary suspension:** a measure that consists of removing an employee from their duties for a certain period, without compensation, used as punishment to the employee for the recurrence of infractions already punished with warning, or upon the occurrence of a medium severity infraction.

**Dismissal or Dismissal for just cause:** a measure that consists of the termination of the employment contract, which will be applied upon the repetition of a previous infraction punished with disciplinary suspension, or in the event of serious misconduct.

### 6.2.2 For third parties related to Randoncorp

Third parties related to Randoncorp are considered to be all of its suppliers, service providers, partners, intermediary agents, sponsors, among others.

**Extrajudicial notification :** a notice to the third party, so that they are aware that their conduct is not in accordance with the guidelines and/or the applicable laws in force. Any notification must be carried out by means of an extrajudicial and be recorded in the third party's file for later consultation. In case of repetition of wrongful acts, more serious sanctions may be adopted.

**Registration suspension:** a measure used when the third party repeats infractions in which a notification has already been applied, or in the event of infractions of medium severity. With the application of this measure, the third party will not be able to contract with the Company for a certain period of time. In case of repetition of wrongful acts, more serious sanctions may be adopted.

**Contract suspension:** a measure used so that the third party, in the event of a recurrence of notifications or if a medium severity infraction is committed, fix the situation that led to the infraction and/or the notifications. When the contractual suspension is applied, the third party will not be able to carry out their contracted purpose during the suspension period. The suspension cannot exceed a period of 30 (thirty) consecutive days and will not lead to the application of contractual fines and interest as a result of the delay for Randoncorp, without prejudice to other contractual clauses. In case of repetition of wrongful acts, more serious sanctions may be adopted.

**Contract Termination:** if the measures applied previously prove to be ineffective or the third party has committed a serious fault, the contract must be unilaterally terminated with cause, without prejudice to the applicability of the sanctions provided for in the contractual instrument and applicable legislation in force, and without prejudice to the imposition of fines or collection of possible losses. The unilateral termination of the contract must block the registration of the third party.

## 7 REPORTS MANAGEMENT

Randoncorp will keep a reporting management system in order to ensure that all actions and conduct in disagreement with the Code of Ethical Conduct, the Integrity Program, and internal and legal standards are regularly investigated, that employees or third parties involved be held accountable, that the damages to the companies are compensated for, and that remedial actions are taken to mitigate the risk and prevent further infractions

## 8 RESPONSIBILITIES

### Board of Directors

- Approve the sanctions policy.

### Ethics Committee

- Ensure the application of this sanctions policy.
- Participate in deliberations on the application of consequences involving members of the senior management of Randoncorp's, and participate in deliberations regarding critical non-compliances by employees and third parties upon request.

## Risk Management and Compliance Area

- Conduct or monitor investigations of reports made related to the Integrity Program.
- Monitor the application of this policy of sanctions.

## 9 CONTROL INFORMATION

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

### Responsible for the document:

#### Author

Risk Management and Compliance Area

#### Review

Legal

#### Approval

Board of Directors

Version	RCA	Date	Modifications
1 <sup>a</sup>	841	07/11/2017	
2 <sup>a</sup>	869	14/03/2019	
3 <sup>a</sup>	940	10/11/2021	
4 <sup>a</sup>	981	14/12/2023	
5 <sup>a</sup>   <b>validity</b>	1020	11/12/2025	Adequação de texto em <i>definitions</i> , item 4. Adequação da expressão <i>warning</i> para <i>extrajudicial notification</i> , e adequação de texto, item 6.2.2. Adequação de texto em <i>registration suspension</i> , item 6.2.2. Adequação de texto em <i>contract suspension</i> , item 6.2.2. Adequação de texto em <i>contract termination</i> , item 6.2.2. Ajuste de texto, com inclusão da palavra <i>keep</i> , item 7.

