

Anti-Corruption Policy

Version 1 - 2023

1. Objective

This Policy is aligned and complementary to the requirements of the Code of Ethics and Conduct of SLC Agrícola, observing the provisions of Law no. 12.846/2013 and other national and international laws and commitments that prohibit corruption, in all its forms. SLC Agrícola's Anti-Corruption Policy aims to establish guidelines and rules for the development, maintenance and continuous improvement of practices to prevent, monitor and combat acts of corruption, including, but not limited to, deviations, fraud, irregularities and unlawful acts committed against the national or foreign government. It also seeks to reinforce the Company's commitment to cooperate with anti-corruption initiatives.

2. Scope

This Policy must be observed by all employees of SLC Agrícola, its controlled companies and affiliates and by anyone with whom the Company maintains or will maintain a commercial relationship, including, but not limited to, suppliers and customers.

3. References

Internal:

- Code of Ethics and Conduct
- Risk Management Policy
- POL.006 - Purchasing Policy

External:

- Federal Law no. 12.846/13 – Anti-Corruption Law;
- Decree no. 11.129/2022: Revoked Decree 8.420/2015.
- Foreign Corrupt Practices Act – FCPA (USA), 1977;
- UK Bribery Act (UK), 2010;
- United Nations (UN) Global Compact;
- UN Convention against Corruption;
- Inter American Convention on Corruption (IACC);
- Business Pact for Integrity and Against Corruption (Ethos)
- Federal Law no. 8.429/92 – Administrative Misconduct Law;
- Federal Law no. 12.813/13 - Conflict of Interest Law;
- Federal Law no. 12.529/2011 - Antitrust Law
- Brazilian Penal Code.

4. Definitions

- **Law 12.846/2013:** Anti-corruption law - Provides for the administrative and civil liability of legal entities for the practice of acts against the national or foreign government and other measures.
- **Decree no. 11.129/2022:** Regulates Law no. 12.846, of August 1, 2013, which provides for the administrative accountability of legal entities for the practice of acts against the national or foreign government and other measures. Revoked Decree 8.420/2015.
- **Integrity Program:** Set of internal mechanisms and procedures for integrity, audit and incentive to report irregularities and in the effective application of Code of Ethics and Conduct, Policies and guidelines with the objective of detecting and remedying deviations, fraud, irregularities and unlawful acts practiced against the public or private administration, national or foreign.
- **Corruption:** In general terms, corruption is the abuse of power entrusted to someone for private gain. It can be classified as major corruption, minor corruption and those of a political nature, public or private, depending on the volume of resources unduly appropriated and the sector in which it occurs.
- **Government:** It is the set of agencies, agents, entities and services that form the structure that performs the administrative function in accordance with the law, covering government agencies and other public legal persons that ensure the satisfaction of varied collective needs, such as safety, culture, health and well-being of the population. The Government may be direct, when composed of the federated entities, which are the Federal Government, the States, the Municipalities and the Federal District, or indirect, when composed of local, foundational and parastatal entities. Its main objective is to satisfy the public interest.
- **Public Agent:** person holding legislative, administrative or judicial office, whether by appointment, election or succession.
- **Whistleblower Channel:** Communication channel to report practices or situations that do not comply with the legislation, the Code of Conduct and the internal guidelines and rules of SLC Agrícola. The Whistleblower Channel is external, the whistleblower can remain anonymous and the information received is treated with confidentiality and any kind of retaliation is prohibited.
- **Corruption:** Any and all actions that imply suggestion, offer, promise, concession or request, requirement, acceptance or receipt of undue advantages, of a financial nature or not.
- **Bribery:** Offer, promise, donation, receipt, request or acceptance of financial or any other advantages or anything of value, for the purpose of influencing the manner in which a person in a position of trust performs public, commercial or legal functions, as well as in making their decisions. Bribery includes any attempt to engage in any of the aforementioned activities.
- **Fraud:** an intentional act committed by one or more individuals, including managers, those responsible for governance, employees or third parties, involving the use of falsehood to obtain an unfair or illegal advantage.
- **Unlawful act:** any act that is contrary to the legislation.
- **Retaliation:** any act of persecution or revenge practiced due to complaints or manifestations of doubts, suspicions or challenges of possible violations of this Policy or illegal and unethical actions;
- **Undue Advantage:** Advantage, or any other benefit that the person has had or may have in the future, for himself or herself or for a third party, directly or indirectly, unduly obtained. Includes, but is not limited to, cash or cash equivalents, gifts, entertainment, travel expenses, and/or payment of personal expenses, accommodations, food, services, privileged information, and/or any other tangible or intangible benefit.

- **Facilitation payment:** requests or payments, usually of small value, used to accelerate processes or obtain some advantage unlawfully. Such payments are not official and are not part of the processes established by the beneficiary body. Usually, they are also known as “urgency rates”.
- **Extortion payment:** this is when money is forcibly extracted from people by real, perceived threats to health, safety, or freedom.
- **PEP:** Politically exposed persons (PEP) are the occupants of public positions and functions listed in the AML/CFT standards issued by regulatory and supervisory bodies.
- **Due Diligence:** it is the procedure by which a documentary and Partner check is made of the legal and business characteristics of the supplier to be contracted.
- **Third parties:** Any individual or legal entity that seeks to make or maintain a business relationship with SLC Agrícola.
- **Supplier:** Any individual or legal entity, public or private, national or foreign, as well as depersonalized entities, that develop production, assembly, creation, construction, transformation, import, export, distribution or marketing of products or provision of services. They also include business partners, i.e., suppliers who can act on behalf of the company.
- **Employee:** Generic term used in this document for Board of directors, Board of executive officers, management, employees, apprentices and trainees.

5. Rules

SLC Agrícola promotes its business with integrity, transparency and honesty and, therefore, does not tolerate its employees or third parties offering gifts, presents or any kind of financial advantage or not, to public or private companies, public agents, politicians and/or persons related to them, in return for private benefits for third parties and/or for the Company. The Company undertakes to prohibit any form of bribery, work with legality and transparency in relations with third parties, whether in the public sector or in the private sector and strive for transparency in the information and collaboration in investigations, whenever necessary.

In this context, the general principles and rules to promote the prevention and combating of all forms of corruption/bribery are:

- Adoption and dissemination of anti-corruption measures at all hierarchical levels, especially by the Board of Directors and Executive Board;
- Maintenance of a specific channel for receiving complaints about irregularities, open and disclosed to employees and third parties, ensuring confidentiality and non-retaliation for the whistleblower;
- Analysis and investigation of each reported complaint and suspicion;
- Application of disciplinary measures in case of violation of the aspects provided for in this Policy, the Compliance Policy, the Code of Ethics and Conduct and other internal Policies and Procedures;
- Verification, during the processes of mergers, acquisitions and corporate restructuring, of irregularities or unlawful acts being committed;
- Provision of corporate and specific training on preventing and combating corruption;
- Inclusion of anti-corruption clauses in the contracts of partners and suppliers;
- Establishment of a specific procedure to regulate the relationship with third parties and the applicable controls;
- Adequate management of Corruption risks, including their analysis and periodic reassessment, considering the necessary adaptations to the integrity program and the efficient allocation of resources;

- Risk assessment of third parties prior to the start of the relationship as well as during;
- Publication of financial statements that reflect the total veracity of the information inserted in them.
- Definition of rules and procedures for donations and sponsorships, seeking prior evaluation and transparency;
- Continuous monitoring of the integrity program with a view to improving it in order to prevent, detect and combat the occurrence of harmful acts under the anti-corruption law.

5.1. Relations with third parties

Subject to the relationships below, employees may not offer or grant bribes, facilitation payments and any benefit that constitutes an undue advantage, either directly or through third parties to any person or organization, nor take advantage of their position to demand, accept, seek to obtain, or promise undue advantages.

- **Relations with Government Agencies and people:** correspond to relations with public agencies, state-owned companies, municipalities, mixed-capital companies and others linked to the government. SLC Agrícola does not offer or accept any advantage, benefit or remuneration (in cash or otherwise) for its own benefit or that of third parties, including the relationship with PPEs and their family members;
- **Relations with political parties:** contemplate political contributions by or on behalf of SLC Agrícola. In compliance with the prohibition contained in the applicable legislation, and the premises of the Company's Code of Ethics and Conduct, SLC Agrícola does not make political donations, including donations to political parties, party members or political candidates.
- **Relations with suppliers, customers and competitors:** correspond to the business cycle and present risk profiles for active and passive corruption. Observing the risk profile, it may be necessary to carry out anti-corruption Due Diligence in accordance with the Company's internal procedures.
- **Relations with non-government organizations:** they include relations with philanthropic institutions. These relations seek to associate economic power with social investment and aim at the development of communities where SLC Agrícola is present.

As established in the Code of Ethics and Conduct, SLC Agrícola's employees, when exercising their duties or as a result thereof, in relation to any audience and in particular the above audiences, the following are prohibited:

- Offer gifts, hospitality or any kind of advantage, financial or otherwise, to any public or political agent, to people related to them, in return for private benefits and/or benefits for the Company;
- Accept any kind of favor, presents or advantages offered by people or organizations that do or seek to do business with the Company, except promotional gifts that do not have commercial value and that do not cause embarrassment to the collaborator or the Company, in accordance with specific internal Policies and Procedures;
- Use an intermediary, an individual or legal entity to conceal or hide the interests or identity of anyone who may benefit from any illegal acts committed;
- Carry out agreements or prior arrangements with competitors or with associations representing competitors whose purpose is to defraud the competitive nature of procedures involving direct and indirect government;
- Establish relationships with competitors, aiming at agreements on prices, production capacities, market sharing, sales territories or production programs and attitudes that eliminate healthy competition;

- Use third parties to carry out any illegal activity or that contravenes the requirements of this Policy and the Code of Ethics and Conduct;
- Fix or exert influence on resale prices and imposing illegal restrictions on commercial counterparties;
- Engage in activities or businesses harmful to the consumer, public or private government or society;
- Make donations to individuals, organizations that pose a risk to the reputation of SLC Agrícola, political parties, members of political parties, candidates for public office, religious institutions and any institution that poses a risk of undue application of the donated resource;
- Maintain political party activities, using funds, facilities, agencies or other means of the Company to support, directly or indirectly, any candidate or political party.

SLC Agrícola instituted the Code of Ethics and Conduct for Third Parties, which establishes the rules that guide ethical, fair, responsible and transparent action. The aspects presented in it are aligned with the premises of SLC's Code of Ethics and Conduct.

In addition, it should be noted that SLC Agrícola does not influence decisions of the public sector, political parties, unions, politically exposed people to obtain any direct or indirect benefit.

Persons who may interact, in the exercise of their functions, with public agents or any private sector entity, must respect the policies and procedures applicable to their interactions. Said interactions may occur in the execution of administrative contracts or in any interaction with the government, even if intermediated by third parties, such as the payment of taxes, inspections or obtaining licenses, permits and certificates.

SLC Agrícola employees can find more information on the subject in the Internal Procedures - PRCO 002 - Relations with Suppliers, PRCO 001 - Relations with Competitors and PRCO 005 - Conflict of Interest

5.2. Donations and Sponsorships

In addition to the general principles already mentioned in the Code of Ethics and Conduct and in compliance with the provisions of Law no. 12.846/2013, making donations and entering into sponsorships must always be made for legitimate reasons, with the highest standard of transparency, integrity and legality. Any donations and sponsorships must be duly accounted for in the accounting records, through a specific and self-explanatory note of the resources spent.

It is everyone's duty to comply with the basic principles in handling donations from sponsors. They are:

- Benefits may not be granted to obtain any undue advantage;
- The current legislation must be fully complied with, i.e., there must be permission for the act, taxes must be considered, among other legal determinations;
- It cannot generate any negative perception and/or that may affect the image of the Company or employees; and
- The event must be properly accounted for and faithfully represent reality.

Any donation and sponsorship must be previously approved, observing the specific rules and when approved, finalized by signing a contract.

SLC Agrícola employees can find more information on the subject in the Internal Policy - Donations and Sponsorships

5.3. Mergers and Acquisitions

Mergers, acquisitions and corporate restructuring processes should provide for risk assessment. In addition, Anti-Corruption Due Diligence aims to verify compliance with legal requirements, irregularities or unlawful acts committed or the existence of vulnerabilities in the legal entities involved, and must be carried out prior to the execution of the transaction. If any non-conformities are identified, they must be assessed, treated and monitored, which may result in the process not being carried out.

After the process is completed, the operations must be the scope of periodic compliance checks with anti-corruption legislation. When necessary, corrective measures should be taken.

SLC Agrícola employees can find more information on the subject in the Internal procedure - PRCO 012 - Mergers and Acquisitions.

5.4. Facilitation Payments

Facilitation payments are prohibited. If there is no legal basis, the collaborator cannot make any payment of this nature, even if it costs them inconvenience. Any payment intended to accelerate or ensure routine actions is illegal and strictly prohibited, regardless of the amount involved.

The collaborator must immediately report any facilitation payment request situation to the Compliance department.

In the event of payment by extortion, the employee must immediately report the situation to the Compliance department.

SLC Agrícola employees can find more information on the subject in the Internal procedure - PRCO 008 - Facilitation Payments.

5.5. Risk Assessment and Due Diligence

Corruption risks must be assessed periodically, observing the provisions of the Company's Risk Management Policy. The process should be the means to:

- Identify bribery risks that the organization can reasonably anticipate;
- Analyze, assess and prioritize identified bribery risks;
- Assessment of the adequacy and effectiveness of the organization's existing controls to mitigate the assessed bribery risks.

This assessment provides for the consultation of different databases, public and private, which allows risk exposure to be assessed. These checks are performed with support from a third-party risk management tool and comprise, but are not limited to:

- National Registry File of Companies Not in Good Standing (CEIS);
- Registry of Impeded Non-Profit Private Entities (CEPIM);
- National Registry of Sanctioned Companies (CNEP);
- National Registry of Civil Convictions for Acts of Administrative Misconduct of the National Council of Justice (CNJ);
- List of Companies that are Ineligible or Not in Good Standing with the Federal Audit Court.

The impact rating must be performed according to the risk exposure. Once the classification is observed, controls are established.

The internal Third Party Risk Management procedure covers the rules and guidelines on the subject in detail.

5.6. Accounting Records and Financial Statements

The Company has accounting control rules and procedures to ensure that assets are protected and used correctly and that financial records and reports are accurate and reliable.

It is everyone's duty to obey and maintain the required internal controls, which include, but are not limited to:

- All funds or bank accounts must be registered;
- Expenses must be proven through a detailed description of the activity and by valid receipts or invoices that reflect the amounts spent;
- Records, receipts or invoices must be approved;
- Any commercial relationship with the public sector must be documented by presenting the appropriate supporting documentation and be timely posted in the Company's accounting records.

False, misleading or incomplete entries in such records or other documents are strictly prohibited;

5.7. Communication and Training

The communication of the guidelines and rules established in this Policy are regularly communicated to all collaborators and external public with the purpose of disseminating and encouraging anti-corruption practices.

Anti-corruption training must be carried out periodically in order to educate and raise awareness among collaborators.

5.8. Whistleblower Channel

Suspected cases or cases with evidence of corruption must be reported through the Whistleblower Channel. All reports received are treated with confidentiality and secrecy, except those where there is a legal obligation to inform government authorities. The report may be made in the following ways:

- a) Directly through telephone: 0800 648 6306
- b) On the website: <https://www.contatoseguro.com.br/pt/slcagricola/>
- c) Through the Contato Seguro app

The Company provides step-by-step internal guidance for making a report and carries out periodic awareness actions about the importance of the channel and records in the event of illegal acts.

The premises for managing the SLC Agrícola whistleblower channel, are:

- To ensure protection and non-retaliation for whistleblowers;
- The possibility of making reports anonymously and preserving anonymity;
- Reports must be made in good faith, with a report of true facts;
- Disciplinary sanctions should be applied:
 - i) when illegality is proven;

- ii) when the whistleblower demonstrably does not act in good faith, communicating facts they know are untrue;
- iii) when attempting or practicing retaliation against the whistleblower.

The internal policy of Investigations and Disciplinary Measures covers the rules and guidelines on the subject in detail.

6. Responsibilities

SLC Agrícola's Board of Directors is responsible for:

- Approving this Policy and promoting and encouraging ethical conduct.

The Officers of SLC Agrícola are responsible for:

- Ensuring the establishment of this Policy and its dissemination to the entire staff;
- Adopting and disseminating measures to combat all forms of corruption and bribery;
- Promoting and encouraging ethical conduct and the appropriate internal control environment.

The Loss Prevention Committee is responsible for:

- Ensuring compliance with this Policy and the ethical principles defined by Brazilian law and the Code of Ethics and Conduct of the SLC Group;
- Analyzing and investigating all complaints, suggestions and doubts registered and forwarded via the Whistleblower Channel, internally and externally, regardless of the hierarchical level of the position held by the reported person.
- Ensuring anonymity, confidentiality and non-retaliation to the whistleblower;

The Compliance area is responsible for:

- Maintaining a Whistleblower Channel for receiving complaints related to possible violations of the guidelines of this Policy;
- Ensuring compliance with the guidelines and rules of this procedure and other related documents;
- Updating this Policy according to the predetermined deadline or, whenever adjustments are necessary;
- Providing communication and training within the scope of this Policy.
- Making reports to the Audit Committee and, when applicable, to the Board of Directors, with free access to these governance bodies being the premise.

The Legal area is responsible for:

- Preparing and establishing standard anti-corruption clauses to be included in contracts entered into by SLC with third parties.
- Ensuring legal compliance and assessing the need to inform authorities when necessary.

The Supply area and other areas that request contracting, is responsible for:

- Including clauses on the guidelines of this Policy in contracts with third parties;
- Informing and reinforcing the importance of the Code of Ethics for Third Parties

All managers and collaborators of SLC Agrícola, as well as the public with which it relates, are responsible for:

- Knowing and following the guidelines and rules of this Policy;
- Participating in the anti-corruption training provided by the Company;

- Formally notifying their immediate superior, the Compliance area or through the Whistleblower Channel, whenever they become aware of a possible violation of the terms of the Code of Ethics and Conduct, this Policy and/or other internal policies and procedures.
- Ensuring that the records, created by them or under their responsibility, are complete, accurate, honestly reflect each transaction, revenue or expense, and are generated in due time and in accordance with applicable accounting rules and standards.

7. Sanctions

Non-compliance with this Policy by employees, as well as with applicable legislation and other internal regulations of the Company are subject to disciplinary measures in compliance with the Investigations and Disciplinary Measures Policy, without prejudice to any applicable legal measures.

Failure to comply with the Company's anti-corruption guidelines, as well as legal aspects by third parties, is subject to the application of penalties and/or contractual termination.

Additionally, SLC Agrícola supports and encourages people to report any practices that may violate internal guidelines and rules, this Policy, the Integrity Program, or that are in disagreement with applicable national and foreign laws. The Company ensures anonymity, confidentiality and non-retaliation to the whistleblower.