**CODE OF** 

# ETHICS AND CONDUCT

FOR THIRD PARTIES







**SLC Agrícola**, founded in 1977 by the SLC Group, produces cotton, soybean and corn, in addition to working with cattle raising, integrating crop-livestock.

It also owns **SLC Sementes** brand, which produces and sell soybean and cotton seeds. It was one of the first companies in the sector with shares traded on the Stock Exchanges, becoming a benchmark in its segment.

We are guided by our **big dream** of positively impact future generations, being a world leader in efficiency in the agricultural business and respect for our planet.

#### **Our Values**

We believe that those who have a **passion for what they do** are committed and do so with the highest quality, preserving the **integrity** of SLC and of individuals through **ethical, coherent and unquestionable conduct.** 

These attitudes, combined, generate **lasting relationships**and respectful relationships between all stakeholders, producing **sustainable results** that are economically viable, socially fair and environmentally responsible.



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### Introduction

We treat all publics with whom we interact with fairly and ethically. We continuously develop, maintain and improve **practices for preventing**, **monitoring and combating acts of corruption**, which include, but are not limited to misconduct, fraud, irregularities and unlawful acts committed against the public and private administration, national or foreign, in compliance with the provisions of Law 12.846/2013.

The **Code of Ethics and Conduct for third parties**¹ seeks to establish the rules that guide ethical, fair, responsible and transparent performance. The aspects presented here are aligned with the premises of SLC's Code of Ethics and Conduct.

We expect third parties and other stakeholders with whom we interact to act by observing the premises of this document and to extend these criteria to their entire value chain.



<sup>&</sup>lt;sup>1</sup>Third parties: Any individual or legal entity that seeks to make or maintain a business relationship with SLC Agrícola.



We conduct our business guided by the utmost standards of ethical and professional conduct.

SLC Agrícola expects third parties to conduct their business with transparency and integrity, to be committed to the highest standards of ethical conduct and to act in accordance with **the principles outlined below:** 

- Comply with all applicable laws;
- Prohibit acts of corruption;
- Engage in the implementation of mechanisms to combat corruption, fraud, money laundering, cartel and other illegalities against the public administration;
- Respect the basic human rights of employees;
- Prohibit slave labor and child labor;
- Take responsibility for the health and safety of its employees;

- Act in accordance with all environmental laws, taking responsibility for any ecological damage, as well as encouraging the value chain to protect the environment and avoid harmful practices.
- Act in accordance with applicable local and international standards of human rights, employment practices, combating corruption and money laundering, information security and data protection;
- Promote, within its chain of third parties, compliance with the requirements of this Code.

Third parties, including service providers that perform any type of activity of SLC Agrícola, **must adhere to this Code, complying with its premises and rules.** If SLC Agrícola confirms that there has been a violation of this Code, the third party may be required to implement a remediation plan or, in certain circumstances, the relationship between the parties will be suspended or terminated. To ensure integrity in relationships, we present the main guidelines next.





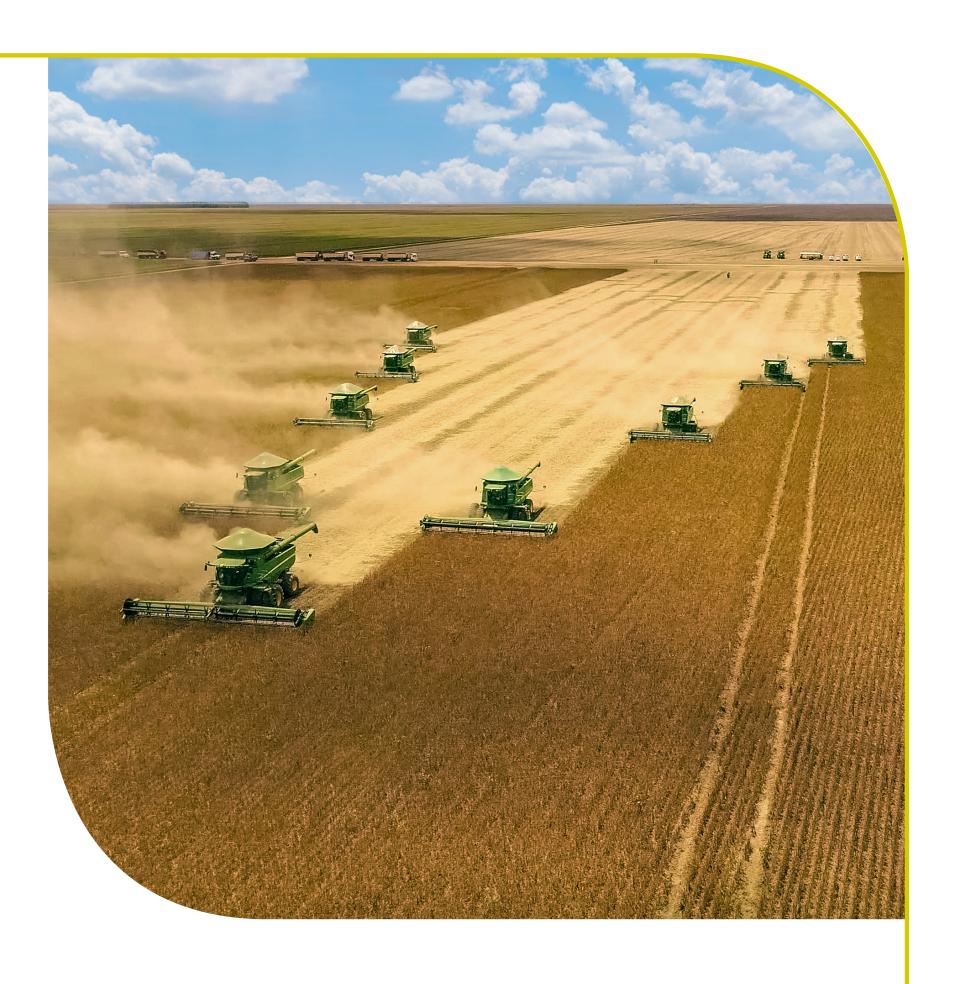
We understand compliance with current laws and regulations as an essential aspect of affirming ethical standards.

We expect third parties to have internal processes that ensure that the company is regularly incorporated and has all the necessary licenses, documentations, certificates and other registrations from the competent agencies to exercise its activities.

The third parties are responsible for immediately informing SLC Agrícola of any event that may compromise its regularity.

#### **Anti-corruption and Preventing Money Laundering**

We expect all third parties to observe and comply with the provisions of Federal Law no. 12.846/2013 (Anti-corruption Law), as well as the legislation that addresses money laundering and/or the financing of terrorism, fraud and other illegal or criminal acts. As well as adopt procedures that prevent the practice of any and all conduct and/or act that may result in violation of this legislation, especially with regard to combating any form of bribery, extortion, kickbacks or other illegal and/or fraudulent practices.



#### **Personal Data Protection**

We expect third parties to ensure compliance with the provisions of the General Personal Data Protection Act (Law 13.709/2018), ensuring privacy of the information of their stakeholders, such as customers, shareholders, employees, third parties and commercial partners. Disclosure, whether intentional or not, of confidential or strategic data that is not in the public domain is prohibited.

Third parties are prohibited from using the trademark and logos of SLC Agrícola without prior authorization from the Company's Communication department.

#### Conflicts of Interest

When acting on behalf of or for the benefit of SLC Agrícola, we expect third parties to ensure that a conflict of interest does not exist.

If situations of conflict of interest, both personal and economic, are confirmed, it is the third party's duty to inform the company, including when they involve politically exposed persons or representatives of political parties.

SLC Agrícola does not authorize its employees to carry out activities that may influence in business decisions. As early as the pre-contractual phase, any kind of private relationship between third parties and SLC Agrícola's employees must be reported, such as family relationships between third parties, employees and former employees of SLC Agrícola and/or shareholders.





#### Gifts and Entertainment

The principles of ethics and transparency that guide our relationship dictate that we should neither obtain nor grant any advantage through the improper use of any gratuities or other commercial incentives.

Third parties are prohibited from offering gifts, hospitality or any other kind of financial advantage or not to any public agent or person related to them, when they are acting on behalf of or for the benefit of SLC Agrícola.

The company only allows employees to accept promotional gifts that do not have a commercial value and do not cause embarrassment to the employee, SLC Agrícola or the third party, in accordance with specific internal policies and procedures.



The acceptance, by SLC Agricola's employees, of business courtesies like travels, gifts, courses and similar offered by third parties, to visit and/or participate in events of a technical nature, can only be accepted with prior approval from the Executive Board.

We do not tolerate any coercive business practices to gain an advantage, or harassment of any kind (moral, sexual, racial, political, or religious).

#### Data Protection and Confidentiality

We expect third parties to ensure the security of information and conscious use of the data at their disposal, so as not to harm corporate and individual rights.

Disclosure, whether intentional or not, of SLC Agrícola's confidential or strategic data that is not in the public domain, is prohibited. Privileged access to this kind of information cannot be used for one's own benefit or that of a third party.



#### **Examples of confidential information are:**

- Accounting data, personnel data and business data;
- Data on product or activity diversification;
- Data on capital increase or dividends;
- Various company management indexes;
- Marketing conditions with suppliers or customers;
- Search results;
- Personal data of people inside and outside the organization that is accessed by the company for the purpose of effectively and efficiently administering and managing our operations.

#### Antitrust

We expect third parties to conduct their relationships with competitors, whether of their business or of SLC Agrícola's business, in such a way as to avoid any attitudes that contribute to the limitation, falsification or any other form of action that may harm free competition and free initiative and that contributes to the formation of cartels, such as price fixing, allocation of customers or territories or manipulation of proposals with competitors.





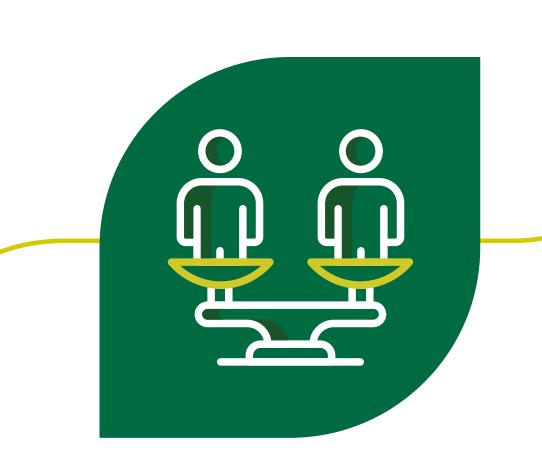
SLC Agricola values an **inclusive and healthy work environment**, therefore, it expects third parties to adopt the following premises:

- It encourages dialogue and relationships based on trust, cooperation and mutual respect. We expect all third parties to value and respect diversity of all kinds, personal dignity, privacy and the rights of all human beings.
- It does not tolerate discrimination towards anyone of any nature, whether due to gender, race or color, ethnicity, social condition, religion, age, marital status, sexual orientation, political or philosophical convictions, permanent or temporary physical characteristics, disability, nationality, or for any other reason. It also does not admit acts of violence, harassment, prejudice and undignified working conditions. We expect the same ethical principles from all third parties and the dissemination of these guidelines among its staff.

 Maintaining the health and safety of employees and third parties working on its premises, if any. We expect our third parties to know and strictly follow all policies and procedures relating to occupational health and safety.

Third parties, prior to the start of the relationship with SLC Agrícola, undergo an approval process in which technical, administrative, financial, legal, reputational, fiscal, socioenvironmental and governance criteria are evaluated. It is the supplier's responsibility to register on the supplier portal and make the requested documentation available. This verification may be revisited at a frequency defined by SLC Agrícola.

It is the supplier's responsibility to keep the documents proving the labor relationship of its employees, as well as the documents proving the legally applicable payments and others it considers necessary to verify the compliance with labor, social security, and occupational health and safety obligations, as agreed upon in a contract entered into between the parties. SLC Agrícola reserves the right to request them at any time during the commercial relationship.





SLC Agrícola does not tolerate any form of child labor or slave labor on its premises or operations, as well as those of third parties. Similarly, it repudiates any act that involves prostitution or sexual exploitation of children and adolescents.

We expect third parties to comply with the following requirements, which represent the minimum employment standards and practices to be met:

- Explicit and clear prohibition of forced labor/slave-like practices or any other form of involuntary labor;
- Explicit and clear prohibition of the use of any form of coercion to make employees work more than the working hours stipulated by local labor laws, in their labor agreements or collective bargaining agreements;
- When overtime is required, it will be paid in accordance with the applicable laws and voluntary agreements, and should not be done because the employer requires it, but by agreement between the parties and ensuring the employee has paid weekly rest;

- Respect for regular working hours and overtime, complying with all applicable laws, regulations and collective agreements;
- Ensure adequate remuneration for employees, in accordance with the minimum criteria established by law or by the union category, and sufficient to meet the basic needs of its employees, with payments on time, in addition to other legal benefits;
- Ensure decent accommodation and acceptable living conditions, maintaining an environment that guarantees basic health and safety conditions for employees, as well as training and preventive measures against accidents and illnesses;
- Compliance with local laws, regulations and standards regarding the minimum working age;
- Compliance with applicable local laws, regulations and standards relating to freedom of association and participation in trade unions;
- Provision of effective, accessible and confidential systems for employees to voice and resolve concerns or grievances in the workplace without fear of intimidation or retaliation.



Third parties must comply with applicable environmental legislation and demonstrate commitment to the **preservation of the environment.** It is a condition for conducting business with SLC Agrícola to comply with all environmental licenses necessary for the company's activity and the product/service.

SLC Agrícola encourages Third parties to take **proactive measures** in their operations and value chain seeking to eliminate their negative impacts and achieve positive impacts on the environment, including, but not limited to:

- Elimination of illegal deforestation. In addition to promoting the restoration and/or conversion of ecosystems in operations, respecting biodiversity;
- Improving efficiency in the use of resources and reducing the consumption of water, energy and raw materials;
- Preventing and reducing environmental impacts and greenhouse gas emissions from its inputs, operations, products and services. They should monitor emissions and establish targets to reduce greenhouse gases;
- Structuring waste management that adheres to the applicable legislation, with efforts to eliminate or reduce the generation of waste (solids and wastewater) and address the increase in reuse and recycling;
- The certification of environmental management systems is seen as good management practice and its implementation is recommended;
- Compliance with SLC Agrícola's environmental policies.



SLC Agrícola has **ethical and legal commitments of social responsibility** and expects third parties to act, within their business models, whenever possible, promoting the following commitments:

- Promote citizenship;
- Encourage volunteering;
- Promote sustainable development;
- Transparency in activities;
- Knowledge of the company's social and community responsibilities.



We expect third parties, when acting in the acquisition of land and real estate, to do so with the free, prior and informed consent of all communities, where applicable. In addition to respecting the rights of indigenous communities and peoples.

## **Integrity and Compliance Mechanisms**

SLC Agricola established the Integrity Program with the purpose of contributing to the fulfillment of the guidelines of the Code of Ethics and Conduct. Therefore, it is everyone's duty to support and engage in the activities, processes and controls of this system to keep it effective at all times.

If you identify, suspect or become aware of misconduct or violations related to any of the requirements of this Code, we ask that you inform us immediately through the relevant channels for the reported facts to be investigated.

Reports received will be handled by a Committee, with total impartiality and confidentiality, and retaliation is prohibited. If proven, corresponding disciplinary measures may occur as a consequence, in addition to the punishments provided for in the legislation.

Similarly, SLC Agrícola recommends third parties to maintain efficient mechanisms to register and investigate complaints of any nature.



The report may be made in the following ways:

- 1) Calling directly: **0800 648 6306**...
- 2) On the website: www.contatoseguro.com.br/pt/slcagricola/
- Through the **Contato Seguro** app.



Third parties will participate in **general training** related to the principles defined in this Code, according to the definitions and classes made available by SLC Agrícola.





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