

**MADERO INDÚSTRIA E COMÉRCIO S.A.**

**GRUPO MADERO ANTI-CORRUPTION COMPLIANCE POLICY**

**I. Introduction**

Grupo Madero is committed to conducting all aspects of its business in compliance with the strictest legal and ethical standards and expects all employees and others acting on its behalf to uphold this commitment.

Following this commitment, Grupo Madero is adopting this *Anti-Corruption Compliance Policy*, applicable both to Grupo Madero, our officers, directors, executives, and employees (which we will refer to herein as “Employees”), and all entities related to Grupo Madero, directly or indirectly. We expect our agents, distributors, representatives, franchisees, consultants, partners, suppliers, and others (whom we will refer to herein as “Third Parties”) to conduct their business related to Grupo Madero in a manner consistent with the principles set out in this Policy.

Grupo Madero will not tolerate bribery, fraud, or corruption of any kind, directly or through third parties, whether or not explicitly prohibited by this Policy or the legislation. Employees are not permitted to give or offer anything of value (including gifts, hospitality, or entertainment – in short, any type of advantage or benefit) to anyone to obtain or maintain a business advantage improperly. Likewise, Employees must not request or accept improper payments.

This Policy and the internal controls contained herein have been created to prevent the occurrence of bribery, the appearance or presence of illegal acts, and to allow Grupo Madero to respond promptly and effectively to any questions about its conduct and those acting on behalf of or for the benefit of Grupo Madero. Employees who violate this Policy may be subject to disciplinary action, up to and including termination of the employment agreement. The following pages provide an anti-corruption guide but do not address all possible scenarios that could lead to non-compliance with this Policy. Therefore, any Employee who has any questions about the terms of this Policy should consult our **Compliance Officer** or, in its absence, any member of the Ethics Committee.

## **II. Our Policy**

### **A. The Employee must not pay, offer, or receive anything of value that could be considered an undue advantage.**

The Employee must conduct its activities in full compliance with this Policy, the laws of the places where Grupo Madero does business, and all potentially applicable anti-corruption laws, including the Brazilian Clean Company Law (Law No. 12.846/13) and its rules, the UK Bribery Act (UKBA, 2010) and the US Foreign Corrupt Practices Act (FCPA, 1977) ("Anti-Corruption Act").

According to this Policy, the Employee is not permitted to give or offer anything of value, directly or indirectly, to any party seeking or in exchange for any type of improper advantage. In particular, it is forbidden to promise, offer, or give anything of value to any Public Official<sup>1</sup> to obtain or maintain a commercial advantage improperly.

Likewise, under any circumstances, the Employees of Grupo Madero's Purchasing Department are prohibited from accepting or allowing members of their 1<sup>st</sup> degree family to accept anything of value from any person or company that has or seeks commercial relations with Grupo Madero, without exceptions.

"Anything of value" should be interpreted as money, gifts (to a specific person or members of its family), debt relief, loans, personal favors, meals, and entertainment, travel support, charitable and political contributions, business opportunities, medical treatments, employment, and internship opportunities, among other items. In other words, bribes, kickbacks, or similar improper benefits are never permitted, whether made to Public Officials or other private parties. Likewise, the Employee must not request or accept such undue payments or benefits.

As mentioned, the Employee must also comply with the UKBA and the FCPA, which may, in some events, be stricter than the Brazilian legislation. Under the UKBA, for example, it is irregular to offer or give anything of value to obtain an undue advantage not only to a Public Official but also to private officials. This guideline is included in this Policy, and we do not accept any type of corruption, regardless of whether it is public or private.

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<sup>1</sup> The term "Public Official" includes anyone who exercises, even if temporarily or without compensation, by election, nomination, appointment, hiring, or any other form of investiture or link, mandate, position, employment, or role in all bodies of the direct, indirect, or foundational administration, of any of the Government Branches, the States, the Federal District, the Municipalities, the Territory, a company incorporated into the public equity, or an entity for whose creation or funding the treasury has contributed or has interest with more than fifty percent equity or annual income, including, but not limited to, licensing bodies, customs agents, and employees of public international organizations (e.g., the Red Cross), public universities, oil companies, public hospitals, and others. For the purposes of this policy, the term also includes members of the Public Official's family (since it is not permitted to give luxurious gifts to a Public Official's spouse or children, if such a gift is prohibited to the Public Official directly).

Of course, this does not mean that we are prevented from carrying out promotional actions, such as giving gifts of fair value, or that we have to change our prospecting, relationship, and negotiation practices with private entities, but only that we must pay attention to the limits established by this Policy and the law.

When the Employee has doubts about whether or not to perform an act permitted by Brazilian law but which it believes is prohibited by the foreign law, it must ask the **Compliance Officer** for guidance.

If you are before a request or demand for undue payment or any other violation of this Policy, it must be immediately rejected and reported to the **Compliance Officer or the Ethics Channel** through the email [etica@grupomadero.com.br](mailto:etica@grupomadero.com.br). Likewise, if any Employee knows or believes that an improper payment has been or will be made or offered, such payment or offer must also be reported to the **Ethics Channel**.

No form of retaliation will be accepted against a person who honestly and in good faith reports a violation or suspected violation of the anti-corruption laws or this Policy.

#### **1. Facilitation payments**

This Policy prohibits any type of payments to Public Officials, including the so-called facilitation payments (small payments made to Public Officials to expedite the performance of routine government actions, such as obtaining licenses, customs clearance, permits, or other necessary documents).

#### **B. Benefits to/from Third Parties (gifts, meals, entertainment, etc.)**

Grupo Madero seeks to promote its business interests through the quality of its products and services, not through excessive gifts or extravagant entertainment. This Policy sets out several rules regarding things of value provided to Third Parties.

##### **1. Gifts**

Gifts are items with a specific destination and with commercial value.

From time to time, Grupo Madero may offer gifts to Third Parties in the private and/or public sector. The use of Grupo Madero funds or assets for gifts must always be based on reasonableness, and offering them when the recipient has the power to decide or influence Grupo Madero's business activities **is prohibited** unless all of the following circumstances are met:

- a) The gift is permitted by local law;
- b) The gift is presented openly with total transparency and is registered in Grupo Madero's records;

- c) The gift is offered as a sign of esteem, courtesy, or in exchange for hospitality, consistent with local customs;
- d) The gift does not involve cash or cash equivalents (e.g., gift cards, store cards, vouchers, etc.);
- e) The item costs less than R\$ 100,00 (one hundred Reais).

These rules also apply to accepting gifts by our Employees, who will only be able to accept gifts from any person or company that maintains a relationship with Grupo Madero if all the conditions above are met.

This rule **does not apply to employees of the Purchasing Department**, who cannot accept or allow members of their 1<sup>st</sup> degree family to accept gifts from any person or company that maintains a relationship with Grupo Madero, without exceptions.

Gifts that do not meet all of the above criteria require prior approval from the **Ethics Committee**.

Gifts that are impossible to determine the nominal value must be returned immediately, with the respective report to the Manager. If the return of the gift is not possible or involves high costs for Grupo Madero, it must be delivered to the **Compliance Officer**, who will determine the destination of the items.

## **2. Meals and entertainment**

Meals and entertainment items (events) may be offered for a commercial purpose from time to time in the course of Grupo Madero's business. Common sense and moderation should prevail when providing meals or entertainment to Third Parties.

Meals and entertainment shall never be offered as a means of improperly influencing the other party's business decision and shall only be provided if it is appropriate, accepted in the ordinary course of a business relationship, and if the primary topic of discussion is business.

Meal and entertainment expenses for Third Parties cannot be incurred unless **all** of the following conditions are met:

- a) The expenses are in good faith and related to a legitimate business purpose<sup>2</sup>;
- b) The expenses are permitted by local law;

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<sup>2</sup> The expenses must be common, reasonable, and necessary to meet a business purpose. Meetings and events where a commercial purpose is discussed are considered reasonable, while entertainment not related to a commercial purpose may not be considered reasonable.

- c) The cost of the meal/entertainment (per person) is less than R\$ 100,00 (one hundred Reais)<sup>3</sup>.

These rules are also applicable for the acceptance of meals and entertainment by our Employees, who will only be able to accept meals and entertainment from any person or company that maintains a relationship with Grupo Madero if all the conditions above are met.

This rule **does not apply to employees of the Purchasing Department**, who cannot accept or allow members of their 1<sup>st</sup> degree family to accept meals or entertainment from any person or company that has a relationship with Grupo Madero, without exceptions.

Meals or entertainment that do not meet the guidelines above requires prior approval from the **Ethics Committee**.

If a meal or entertainment unexpectedly exceeds the limit, the **Compliance Officer** must be notified as soon as possible. The Employee must try to avoid such situations.

For all these expenses, the reimbursement request shall identify the total number of participants and their names, company, and, if possible, positions. In all cases, meals or entertainment for friends and family of Public Officials are prohibited. All expense reimbursements shall have invoices, a complete description of the business purpose, and a record of any necessary approvals, and all of them must be accurately and fully noted in Grupo Madero's records.

Situations in which Grupo Madero provides a meal or entertainment to a Third Party, but no representative of Grupo Madero is present (accompanying this Third Party) are prohibited.

### **3. Travel support**

From time to time, Grupo Madero may provide travel (air transport, train travel, etc.) or lodging/accommodation for Third Parties. The provision of travel shall never be offered as a means of improperly influencing the other party's business decision. When the provision of travel is required by business needs, common sense and moderation shall prevail. The definition of the travel model and class, as well as its accommodation, depends on the nature of the activity, the individual involved, and whether the expense is necessary and proportionate to the nature of the activity involved must be taken into account.

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<sup>3</sup> Sequential events shall be considered as a single event in this Policy. For example, drinks followed by dinner shall be considered a single event and together as to the limit applied for meals.

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The provision of travel to Third Parties by any individual or entity (from the public or private sector) that has the power to decide or influence Grupo Madero's business activities **is prohibited** unless **all** of the following conditions are met:

- a) The expenses are in good faith and related to a **legitimate business purpose**, and representatives of Grupo Madero attend the events related to travel and/or accommodation;
- b) The local law permits the provision of travel;
- c) The duration of the trip is as short as possible to meet the legitimate business purpose<sup>4</sup>;
- d) The travel route is direct to the destination, whenever possible, without unnecessary stops;
- e) For air travel, economy class tickets are mandatory. Business class tickets are not permitted unless previously approved in writing by the **Ethics Committee**;
- f) For accommodation, only single rooms will be allowed in hotels suitable for business. All-inclusive or deluxe resorts are not permitted unless previously approved in writing by the **Ethics Committee**.

**All travel support for Public Officials must be previously approved in writing by the Ethics Committee.** In all cases, travel or accommodation reimbursements for friends and family of Public Officials are prohibited.

These rules also apply to the acceptance of travel support by our Employees, who will only be able to accept travel support from any person or company that maintains a relationship with Grupo Madero if all of the above conditions are met.

This rule **does not apply to employees of the Purchasing Department**, who cannot accept or allow members of their 1<sup>st</sup> degree family to accept travel support from any person or company that has a relationship with Grupo Madero, even if all conditions above are met.

The reimbursement request shall identify each traveler's name, company, and title for all travel support expenses. All expense reimbursements must contain invoices, a complete description of the business purpose, and a record of any necessary approvals – and all of them must be accurately and fully noted in Grupo Madero's records.

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<sup>4</sup> Generally, trips for a legitimate business purpose shall be scheduled as efficiently as possible under the specific circumstances. Travelers must not arrive at their destination more than one day prior to the start of the business meeting/appointment and must not leave the location more than one day after its completion, unless there is no other reasonable way to schedule the trip.

Daily subsistence allowances must not be provided to Third Parties during travel.

Payments for travel-related services shall be made directly by Grupo Madero to the service provider and must not be paid directly as a refund unless previously approved in writing by the **Ethics Committee**.

#### **4. Employment / Internships**

Occasionally, Public Officials or business partners of Grupo Madero may request that the company provide internships or employment to some people. Offering internships or employment to individuals related to Public Officials or other individuals linked to Grupo Madero's business can be seen as a "thing of value" even if it is not remunerated.

This Policy establishes that these requests must be handled as follows: if a candidate is interviewed for an internship or employment in the ordinary course of filling a vacancy, the **Compliance Officer** must be notified of the candidate's relationship with a Public Official or with the commercial partner of Grupo Madero. If a candidate related to a Public Official or a business partner of Grupo Madero is interviewed outside the ordinary course of filling a vacancy, any offer of internship or employment must be previously approved in writing by the **Ethics Committee**.

#### **5. Use of personal funds**

All provisions of this Policy and the reporting requirements apply even if the Employee is not seeking reimbursement of expenses (i.e., out-of-pocket expenses must also comply with these requirements).

##### **C. Political and charitable donations**

Employees must not make political or charitable donations, either in their own name or on behalf of Grupo Madero, to obtain or retain business or obtain an improper commercial advantage.

Political contributions by Legal Entities, including Grupo Madero, are expressly prohibited by Brazilian law and, therefore, are also not permitted under the terms of this Policy.

Grupo Madero's philanthropic contributions must be permitted under the law, under this Policy, made to a genuine organization and, in the case of charitable donations linked or indicated by any Public Official or Public Administration<sup>5</sup>, with the prior written consent of a **Compliance Officer**.

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<sup>5</sup>"Public Administration" means (i) any national, federal, state, district, municipal, or foreign public entity or any entity that performs executive, legislative, judicial, regulatory, tax, or administrative functions and/or belonging to the Government; (ii) any public international organization; (iii) any agency, division, office,

In some cases where there is a high risk of corruption, the **Ethics Committee** may require additional verification.

The **Compliance Officer** must be immediately notified if a Public Official requests any kind of political or charitable contribution.

### **III. Relations with Third Parties**

Grupo Madero may be held liable for the actions of Third Parties acting on its behalf or in its interest. Therefore, Employees who interact with Third Parties are responsible for taking the necessary precautions to ensure that Third Parties conduct business ethically and comply with this Policy, **Grupo Madero's Third Party Compliance Policy**, and the applicable laws.

Such precautions may include conducting third party verifications, the inclusion of specific anti-corruption clauses in the contract with the third party, requiring the third party to certify that it has not and will not violate this policy and applicable anti-corruption legislation during the course of business with Grupo Madero; and monitoring the reasonableness and legitimacy of the scope of services provided and payments made to the third party. Bonuses or agreements involving success fees with third parties representing Grupo Madero before the Public Administration or interacting with Public Officials are not acceptable under any circumstances. This rule prohibiting a success fee does not apply to lawyers or law firms representing Grupo Madero in legal proceedings in the ordinary course of business.

Employees who have relationships with third parties who represent Grupo Madero before government entities or who interact with public officials must discuss the relationship with the **Compliance Officer** and ensure compliance with the Third Party Compliance Policy before hiring the third party. Any questions regarding the scope of third-party verification efforts shall be discussed with the **Compliance Officer**. No service must be carried out before the contract is signed.

Grupo Madero employees must be aware of red flags when dealing with third parties. These warnings are actions or facts that may signal a high possibility of misconduct by a third party. A warning does not mean that something has happened but that a check is needed. These signs vary depending on the circumstances, but examples are:

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department or other political subdivision of the Government, of any government, entity or organization described in the preceding clauses (i) or (ii) of this definition; (iv) any company, business, or other entity that has an equity interest, in whole or in part, or controlled by the Government, entity, organization or other person described in the preceding clauses (i), (ii) or (iii) of this definition; or (v) any political party.



- Requests for unusual or exaggerated payments, overpricing, early payments, payments requested in a short time, success rates, and unusual commissions.
- Request to execute payments in a country other than the one where the third party is located or where it is providing services to Grupo Madero.
- Payment requests to another third party, to a numbered account, or in cash.
- Requests or suggestions for donations to political or charitable entities.
- The third party is related to a public official or has a personal or business relationship with public officials.
- Any hesitation or refusal by the third party to identify its owners, partners, or directors.
- The third party uses holding companies or other methods to make it difficult to identify its partners without reasonable business justification.
- The third party expresses its desire to keep its relationship with Grupo Madero secret.
- The third party has little or no industry experience but claims to know the “right people”.

**If the Employee suspects that a Third Party is involved in potentially improper conduct, it must immediately report its concerns to Madero Ethics Channel by email: [etica@grupomadero.com.br](mailto:etica@grupomadero.com.br).** Grupo Madero will conduct an investigation and take appropriate corrective measures, including the suspension of payments to the Third Party if suspicions are confirmed in the inquiry.

#### **IV. Maintenance of records and internal controls**

This Policy requires that all expenditures made by Grupo Madero be accurately reflected in its records and that all payments made using Grupo Madero’s funds or on its behalf have been duly authorized.

Employees must follow all applicable accounting and financial reporting standards, principles, laws, and practices. In addition, when required, Employees must submit complete reports and records within the established time. In particular, Employees must ensure that no portion of any payment is made for any purpose other than that fully and accurately described in Grupo Madero’s books and records.

Employees must ensure that all transactions, provisions, and payments involving Grupo Madero’s funds or assets are correctly and accurately entered into the financial records. No undisclosed or unrecorded accounts shall be established for any purpose. False or artificial entries must not be made in Grupo Madero’s books and records under any circumstances. Finally, personal resources must not be used to carry out what this Policy prohibits.

The **Ethics Committee** is primarily responsible for supervising and enforcing this Policy. Grupo Madero will carry out periodic audits of books and records to monitor compliance with this Policy.

## **V. Compliance and training procedures**

As part of Grupo Madero's ongoing commitment to the Anti-Corruption Compliance Policy, all Employees will receive a copy of this Policy. The Employee shall then certify that it has read and agrees to comply with this Policy and to report any possible violation of this Policy. This certification is attached hereto as an Exhibit to this Policy and must be signed and filed with the Human Resources department.

In addition, Grupo Madero will offer periodic compliance and anti-corruption training programs to all Employees on the requirements and obligations of this Policy. The Employee who holds a management position and/or is responsible for Grupo Madero's financial control processes will undergo additional training sessions designed to address potential compliance risks associated with their departments. Grupo Madero will retain records of these training sessions.

## **VI. Against money laundering**

### **A. General**

Grupo Madero is committed to fighting money laundering. Protecting Grupo Madero from being used for money laundering is the responsibility of all Employees, and the **Compliance Officer** is responsible for implementing, updating, and monitoring Grupo Madero's compliance with this effort.

Engaging in money laundering activities, even if carelessly and unintentionally, may result in possible penalties for Grupo Madero and our Employees and may also damage our reputation. Under no circumstances must any Employee of Grupo Madero facilitate or be engaged in any money laundering activity.

Money laundering consists of hiding or disguising the nature, origin, location, disposition, handling, or ownership of goods, rights, or values arising, directly or indirectly, from a criminal offense. This may be carried out through one or more legitimate accounts, businesses, or other channels to make that money or asset appear legitimate or make it more difficult to trace its illicit source.

In several legal and regulatory systems, however, the term money laundering has been confused with other forms of financial and business crimes, and it is sometimes used more generally to include misuse of the financial system (involving transactions

such as bonds, digital currencies, credit cards, and traditional currency), including terrorist financing and violation of international sanctions. Any engagement in a transaction that seeks to reconcile or disguise the nature, location, source, disposition, handling, ownership, or control of property, rights, and money derived from the criminal activity may constitute money laundering.

Money laundering generally takes place in three stages:

- Placement: introduction of money into the financial system by some means;
- Layering: carrying out financial transactions to camouflage the illegal origin of money;
- Integration: reintroduction of “clean” money into the economy.

#### **B. Risks for Grupo Madero**

Potential money laundering risks for Grupo Madero include, without limitation:

- Engaging in a transaction with a customer, supplier, and/or intermediary that is involved in illegal activities (whether or not that illegal activity relates to Grupo Madero);
- Accepting payments knowing that the payment represents the proceeds of illicit activity;
- Preparation of tampered invoices and other financial documents to disguise the illegal origin.

We have adopted this Policy and will provide periodic training to our Employees to reduce the risk that we could be used for money laundering, as applicable.

#### **C. Red Flag Report**

Grupo Madero Employees must report any situations that raise suspicions of money laundering to the **Compliance Officer** or the **Ethics Channel**.

All Grupo Madero Employees are expected to be alert to any situations that may indicate that this Policy or the laws are not being met. The existence of a Red Flag (or “warning”) requires an additional audit to resolve potential issues before a transaction can go ahead. Warnings include (but are not limited to):

- transactions with politically exposed persons<sup>6</sup> who occupy, or have occupied, in the last five years, in Brazil or other countries, territories, and dependencies,

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<sup>6</sup> Article 4, §1 of Circular Letter 3.654/13 of the Central Bank of Brazil defines “politically exposed person” as public officials who perform or have performed, in the last five years, in Brazil or foreign countries, territories

public jobs or functions, as well as their representatives, family members, and other close people;

- a Third Party using unusual or suspicious identification documents that cannot be readily verified;
- a Third Party that provides a registration number (such as CNPJ) different from a previously used number;
- a Third Party that uses different identification/registration numbers with variations of its name;
- a Third Party whose home or business phone is out of order;
- a Third Party that makes frequent or high volume transactions and has no record of past or present experience;
- a Third Party that attempts to persuade Grupo Madero staff not to complete required reports or maintain required records;
- a Third Party that requests to be released from reporting or record-keeping requirements;
- reluctance to provide additional information, including information about the Third Party's identification/registration, or to answer questions when requested;
- unusual orders, purchases, or payments that are inconsistent with the customer's trade or business – purchases or transactions that do not make economic sense; a Third Party's activity patterns that show a sudden change inconsistent with the regular activities;
- payments that are made in currencies other than those specified on the invoice, contract, or purchase order;
- a Third Party that attempts to receive or make payments in cash or cash equivalents, such as bank checks;
- transactions that are made through unknown or unnecessary intermediaries or that are accompanied by request for secrecy;
- requests to make an overpayment;
- early termination of orders, especially at a cost to the customer or supplier, or when payment is made or the refund check is directed to an apparently unrelated third party;

- early repayment of loans in cash or cash equivalents;
- any large cash payment.

## **VII. Mandatory reports**

Grupo Madero Employees must immediately report any violation of this Policy through the **Ethics Channel**. In addition, it must immediately inform any Employee or Third Party that it suspects being involved in illegal conduct in Grupo Madero's business or assets.

If you become aware of any existing or potential violation of this Code or Grupo Madero's policies, please notify us promptly through our Ethics Channel via the email address: **etica@grupomadero.com.br**. Report any suspicious activity, anonymously or otherwise, through the Ethics Channel.

If there is an interest in making an anonymous report, the whistleblower can create a generic email address to maintain its anonymity. All forwarded emails will be treated as confidential and will not be tracked.

As long as a report is made honestly and in good faith, Grupo Madero will not take any action against any person based on the report of a known or potential violation of Grupo Madero's policies or procedures or applicable law or providing further information in connection with an investigation carried out by Grupo Madero.

## **VIII. Non-retaliation and whistleblower protection**

Grupo Madero takes its commitment to anti-corruption very seriously and expects all Employees to share this commitment to always comply with the laws and our policies.

Every Grupo Madero Employee is responsible for reporting any actual or potential violations of laws, regulations, policies, and procedures. Doing so allows Grupo Madero to analyze the matter and define appropriate actions. This is the best way to create an open and positive work environment throughout the organization.

Grupo Madero's policy prohibits retaliation against the Employee that raises concerns in good faith. Any negative action taken against the Employee that raises concerns regarding a violation or possible violation of this Policy, other policies, or applicable laws is unacceptable and constitutes a violation of this Policy and Grupo Madero's Code of Conduct.

Anyone who makes a report that it knows to be untrue in a way that defames, threatens, or damages the reputation of others will be subject to disciplinary action.

Discouraging other Employees from making a report or getting the help they need is prohibited and may result in disciplinary action.

#### **IX. Questions about this Policy**

If you have doubts, you shall ask questions about the possible application of this Policy. There are several people and channels available to ask for advice and guidance:

- your immediate manager;
- the Human Resources department;
- the **Compliance Officer**.

All inquiries will be promptly forwarded to the most appropriate area within Grupo Madero for resolution. All reports of misconduct or suspected misconduct will be kept confidential to the extent possible, consistent with the need to conduct a proper investigation.

This means that your report will be shared with a limited number of people, who will have an obligation to maintain confidentiality. Disclosure of reports of concerns to individuals not involved in the investigation will be considered a serious disciplinary offense and may result in termination of the employment agreement.

#### **X. Continuous Monitoring and Review**

Grupo Madero recognizes the importance of continuous monitoring and risk management. In this context, the company will carry out a periodic risk assessment, addressing the company's compliance risks and the effectiveness of its internal controls.

The **Compliance Officer**, including through its team, has the authority to carry out investigations independently and apply potential measures seeking to improve the prevention, detection, and response to potential non-compliance.

Notwithstanding the foregoing, concerning investigations of possible violations of this Policy by any current or former directors of Grupo Madero, the **Compliance Officer** shall submit a request to the **Ethics Committee** to initiate an investigation. After the **Ethics Committee's** approval, the **Compliance Officer** may conduct the investigation together with any external or internal consultants and professionals.

#### **XI. Disciplinary Sanctions**

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Failure to comply with the rules and principles of this Policy or the other Policies of the compliance program of Grupo Madero shall be considered violations subject to disciplinary sanctions under the applicable legislation.

In addition, Grupo Madero reserves the right to submit any violation deemed material to the authorities.

## **CONTACTS**

Inquiries, suggestions, or contact with the Compliance Officer:

[compliance@grupomadero.com.br](mailto:compliance@grupomadero.com.br)

Reports:

[etica@grupomadero.com.br](mailto:etica@grupomadero.com.br)

Ponta Grossa, July 13, 2022.

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**EXHIBIT A**

**CERTIFICATION OF ANTI-CORRUPTION COMPLIANCE POLICY**

I acknowledge that I have received, read, and fully understood this Anti-Corruption Policy of Grupo Madero and agreed to comply with all requirements and guidelines contained therein.

I will participate in Grupo Madero's training regarding our integrity practices, and I declare that I understand that failure to comply with this and other Grupo Madero's policies, as well as applicable anti-corruption legislation, will result in disciplinary action by Grupo Madero, including potential contractual termination, in addition to independent legal sanctions that can lead to several civil, administrative, and criminal penalties.

Signature:

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Name (readable):

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Restaurant/Dept.:

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Date:

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### **Instruções de Entrega**

- Após o lançamento inicial da Política e, uma vez por ano a partir de então, todos os Colaboradores deverão preencher este formulário e entregá-lo para o **Recursos Humanos**.
- Os novos Colaboradores devem preencher este formulário imediatamente após a contratação e entrega para o **Recursos Humanos**.