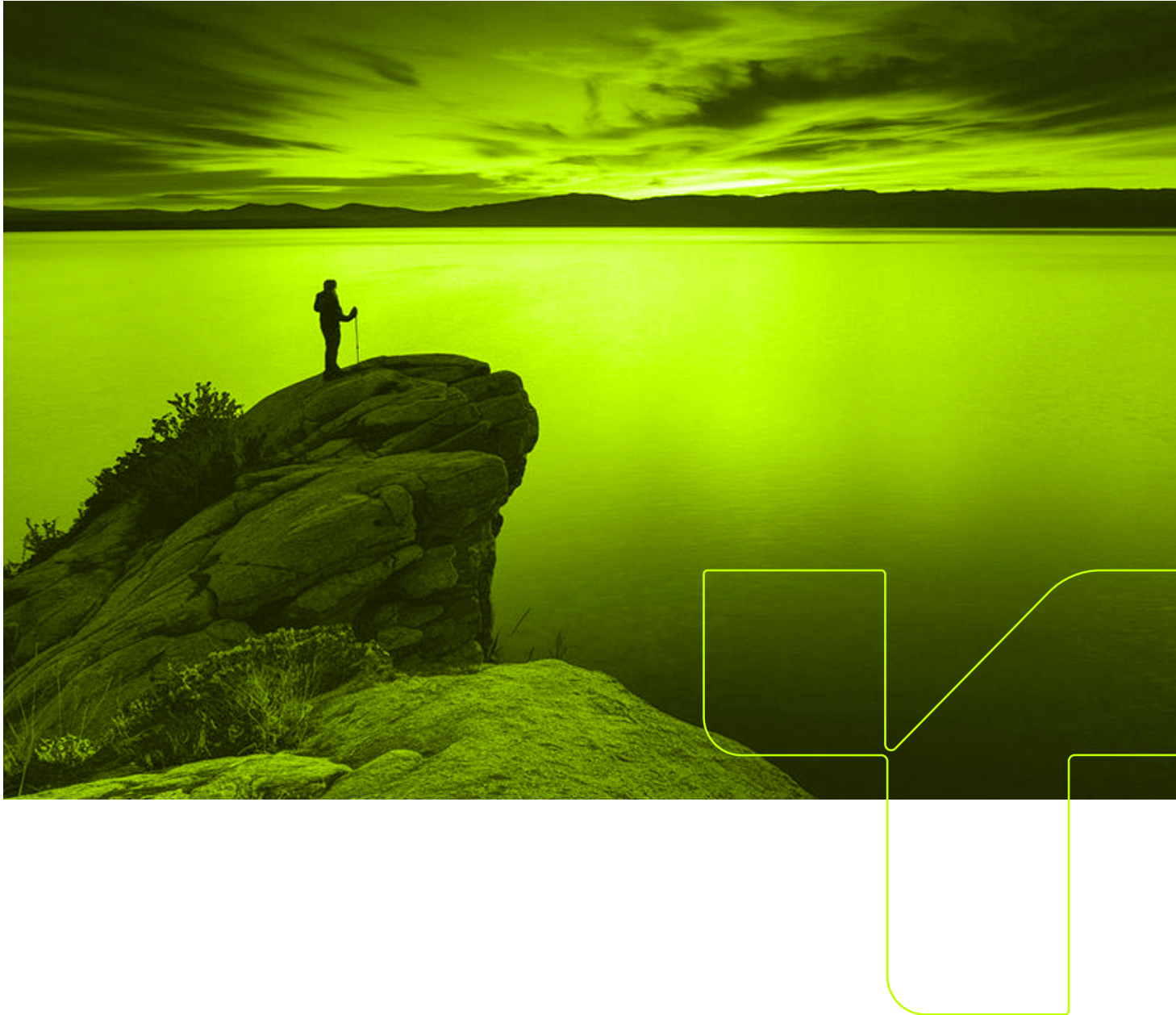




INTEGRITY AND COMPLIANCE POLICY

TORFRESMA



PURPOSE AND INTEGRITY

Why do we need to know this policy?

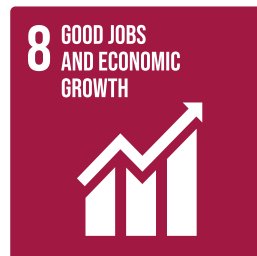
It establishes guidelines and orientations that promote the company's integrity and ethical values, contributing to its management and corporate governance.

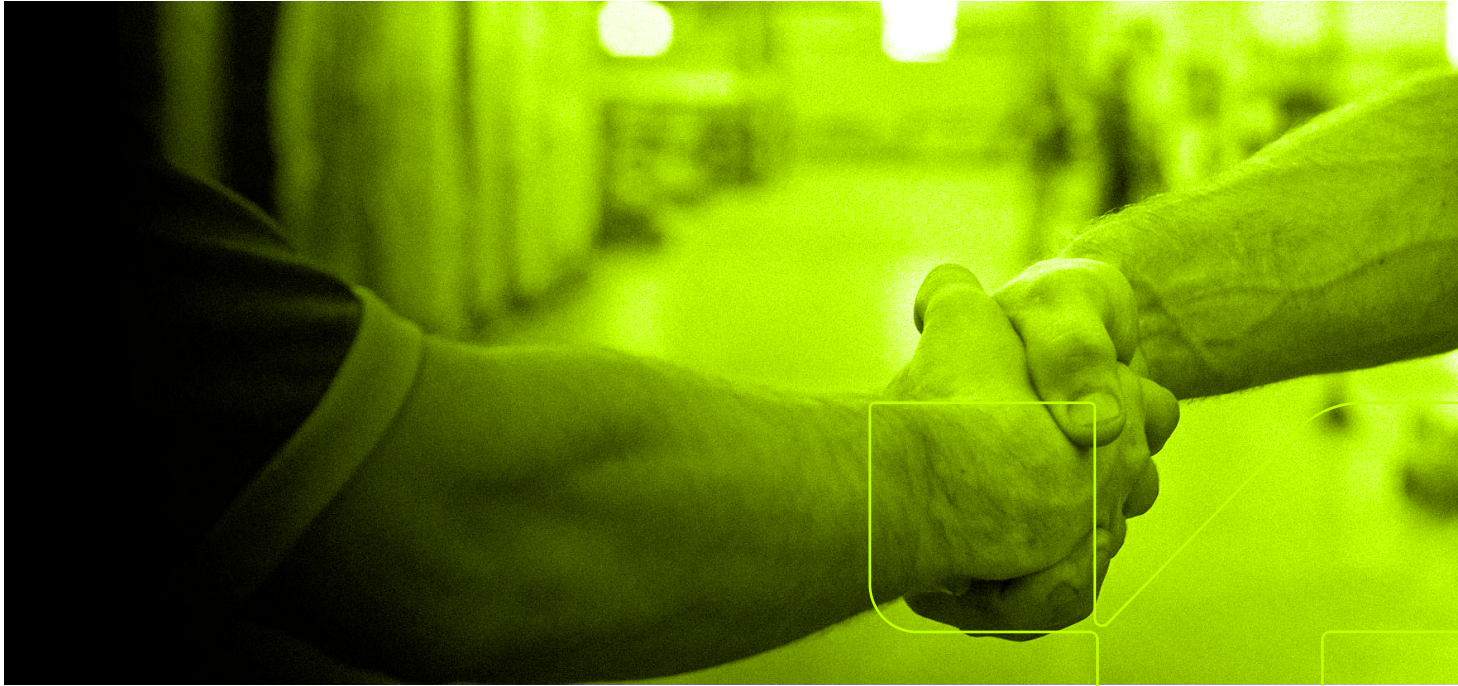
Therefore, employees, partners, directors and third parties who have a relationship with the company or represent its interests need to engage with this Program, strengthening Torfresma's ethically and socially responsible culture.

SUSTAINABLE DEVELOPMENT GOALS (SDGs)

The Sustainable Development Goals (SDGs) are a global agenda that includes global efforts to address climate change, sustainable production and consumption patterns, sustainable cities, reducing inequalities, energy, water and sanitation, among others.

Considering Torfresma's contribution to the SDGs, the following priority SDGs are incorporated into this policy:





CODE OF CONDUCT

Torfresma prioritizes the well-being and safety of people. In the workplace, everyone must feel comfortable and safe to perform their activities, and this is everyone's responsibility.

The main conducts expected of everyone who has a relationship with Torfresma include:

- Ethical and transparent behavior;
- Treat everyone with respect, dignity and fairness;
- Never engage in any form of harassment or coercion;
- To contribute to an environment of respect, freedom of expression, and freedom of political conviction;
- Act in accordance with internal rules and policies;
- Comply with all applicable laws and regulations;
- Protect the confidentiality of information, the Torfresma brand, and the personal data of those involved;
- Act in accordance with the procedures adopted by information security technology;
- Protect and respect the environment.
- Immediately report any indication of a violation of laws, internal regulations, or ethical principles, using Torfresma's official channels.

INFORMATION SECURITY AND INDUSTRIAL PROPERTY

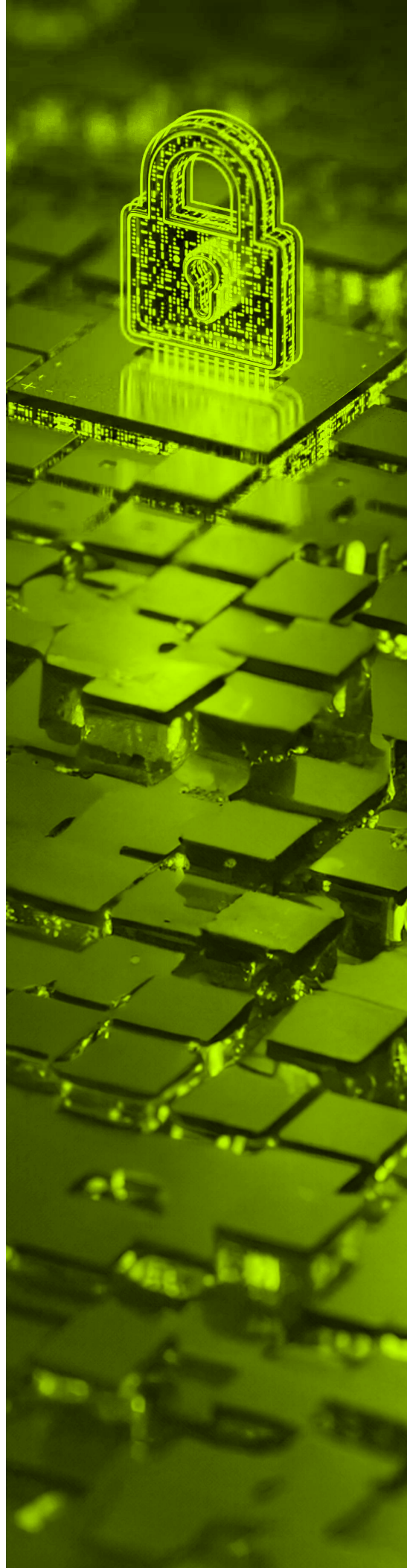
All employees and third parties who interact with Torfresma are responsible for protecting internal information and materials transmitted and shared through communication systems and equipment. Data transmission through resources must be done with caution and responsibility, ensuring that the resources made available are used only for the relevant purposes.

All information produced as a result of Torfresma's professional activity is Torfresma's property, and employees and third parties who have access to such information are responsible for the use, maintenance and protection of such information.

PRIVACY AND DATA PROTECTION

Torfresma maintains a solid commitment to the privacy and security of the personal information of its customers, employees, suppliers, service providers and partners.

All information provided to Torfresma or collected by it is treated with the highest level of care and in accordance with the most stringent security standards. The company is duly prepared to comply with the principles established in Law No. 13,709/2018, known as the General Data Protection Law (GDPL).



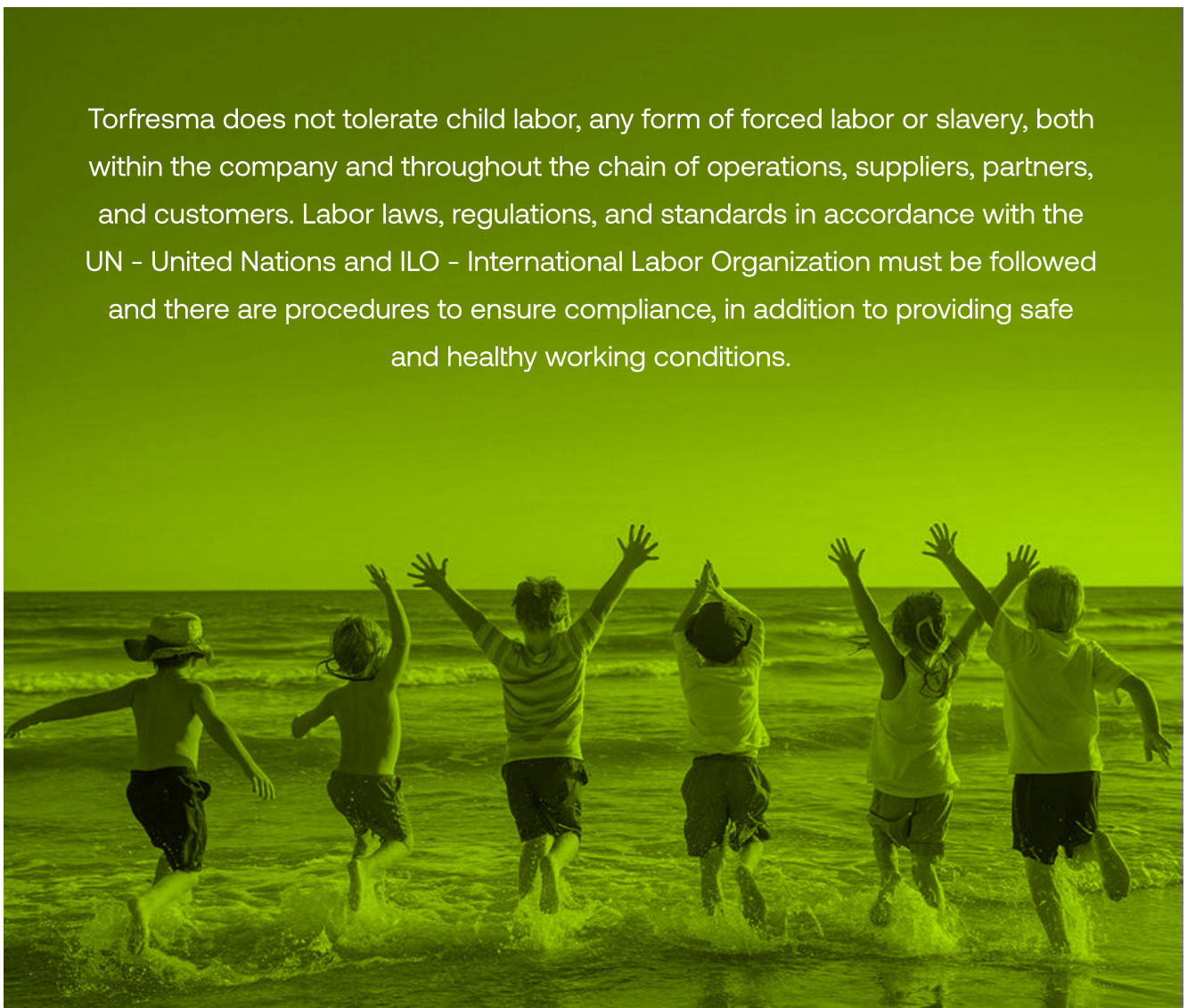
RESPECT FOR PEOPLE AND EQUAL OPPORTUNITIES

Torfresma does not tolerate any form of prejudice, and relationships between employees, managers, partners or third parties must be guided by cordiality, trust and respect, regardless of hierarchical position, job or activity performed; gender; age; race; color; ethnic origin; religion; economic status; education; physical appearance; nationality; marital status; sexual orientation; belief; philosophy of life; political ideology; physical and/or mental limitations.

Everyone must be treated fairly and equally and committed to promoting equal opportunities and valuing diversity.

At Torfresma, it is essential to respect internationally recognized human rights, which refer to respect for the dignity and value of each person, the right to life and liberty, the right to privacy, freedom of opinion and expression, free association, the right to work and education.

Torfresma does not tolerate child labor, any form of forced labor or slavery, both within the company and throughout the chain of operations, suppliers, partners, and customers. Labor laws, regulations, and standards in accordance with the UN - United Nations and ILO - International Labor Organization must be followed and there are procedures to ensure compliance, in addition to providing safe and healthy working conditions.



FIGHTING CORRUPTION AND BRIBERY

Torfresma does not offer or accept bribes, kickbacks or other corrupt payments, regardless of local practice or perceived customs. Bribes are illegal and can damage the reputation of conducting business with integrity. Therefore, we must never:

- Offer, accept, request or pay, directly or indirectly, bribes or facilitation payments;
- Use initiatives, such as charitable donations, sponsorship, social investments or the practice of offering/accepting gifts, entertainment and/or hospitality, as a way to obtain or allow others to obtain an undue advantage.

When dealing with public officials, we must act in accordance with the Brazilian anti-corruption law (Law No. 12,846/2013), the American law prohibiting the practice of corruption abroad (Foreign Corrupt Practices Act, FCPA) and the UK Bribery Act, which makes it a crime to offer or grant anything of value, whether directly or indirectly, to a government official in order to improperly influence him or her.

CONFLICT OF INTEREST

A conflict of interest occurs when the individual interests of employees are not in line with those of Torfresma and, therefore, is detrimental to the company. All employees must act in accordance with the Code of Conduct and carry out their activities in harmony with the interests of Torfresma, without improper influence and in disagreement with the company's guidelines.

GIFTS AND PRESENTS

The offering or receiving of gifts and presents in certain situations may constitute an occurrence of favoritism between one or both parties involved.

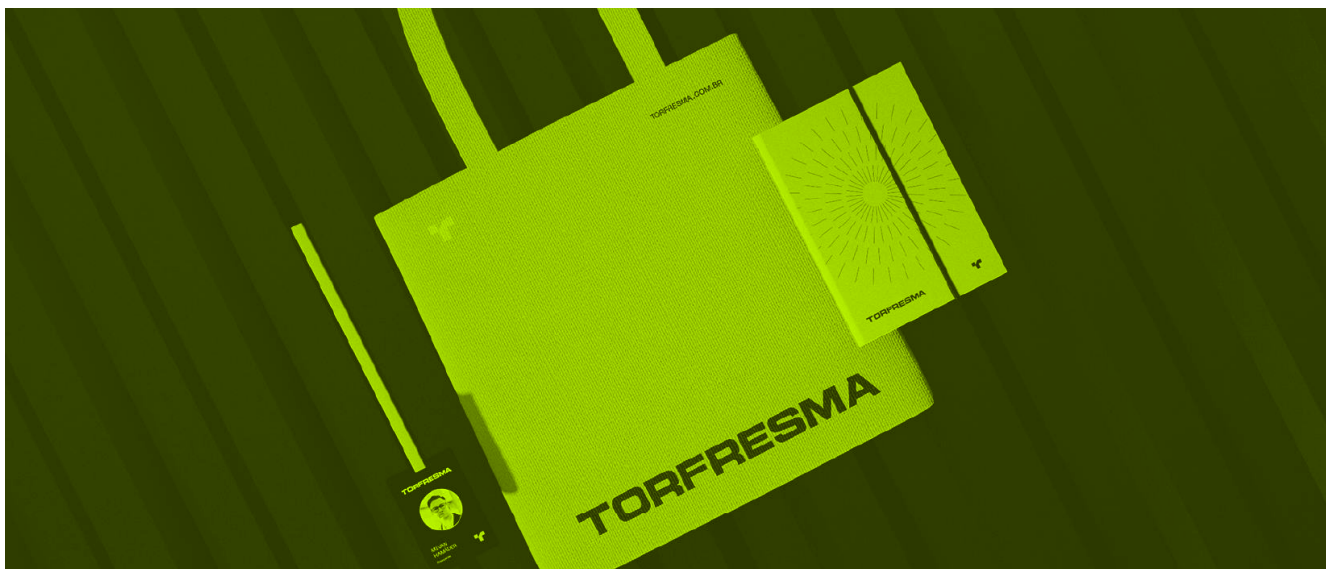
As it may represent an opportunity for fraud and corruption, Torfresma prohibits the receipt of gifts, presents or hospitality in exchange for any personal benefit or favoritism to the offeror or third parties.

The specific policy on Courtesies - Gifts and Presents comprehensively clarifies the practice of offering and accepting gifts and hospitality.

RELATIONSHIP WITH THIRD PARTIES

Relationship with third parties must be guided by the premises and guidelines established in this policy and aligned with Torfresma's strategic and operational objectives.

Thus, Third Parties must also carry out their activities based on ethics, social and environmental responsibility, in addition to compliance with anti-corruption laws. To clarify these premises in greater depth, Torfresma shares the Supplier Policy with its business partners.





SUSTAINABLE DEVELOPMENT

We reinforce our commitment to sustainable development through guidelines that include environmental, social and governance aspects and practices for sustainability in business (ESG). In all our activities, we seek to ensure long-term business success, contributing to the construction of a fair society, economic development and environmental preservation.

We respect and comply with all provisions of current environmental legislation, assuming our responsibility; We prioritize the supply of products and services with low environmental impact; We work to establish action plans and goals to reduce adverse impacts on society.

In addition, we expect and encourage our suppliers, service providers and partners to share our commitment to sustainability.

COMMUNICATION AND COMPLAINT CHANNEL - OMBUDSMAN

Torfresma maintains a training and communications plan for its employees and for disseminating information to third parties, raising awareness of the importance of complying with the provisions of this policy.

All employees and all other stakeholders must report any situation that indicates a violation or potential violation of ethical principles, policies, standards, laws and regulations, discrimination, occupational health/safety issues, working conditions or any other improper and/or illegal conduct, especially conduct that violates any of the items set forth in this Policy, through the Ombudsman:

[OMBUDSMAN - CLICK HERE](#)

It is important to emphasize that this channel is confidential and guarantees the anonymity of the whistleblower.

The screenshot displays the Torfresma website's header and a contact form. The header includes the Torfresma logo, navigation links (Produtos e Soluções, A Torfresma, Cases, Pós-vendas, Trabalhe Conosco, Contato), a language selector (PT, EN, ES), and a search icon. The contact form on the left has fields for 'Nome', 'Selecione o Assunto', and 'Mensagem', along with a checkbox for terms of use and an 'ENVIAR' button. To the right, a 'DÚVIDAS' (FAQ) section addresses questions about the reporting process and anonymity.

TORFRESMA

Produtos e Soluções A Torfresma Cases Pós-vendas Trabalhe Conosco Contato

FALE COM UM ESPECIALISTA PT EN ES

Nome

Selecione o Assunto

Mensagem

☐ Concordo com o tratamento dos dados enviados, de acordo com os termos de uso do site.

ENVIAR

DÚVIDAS

O que é feito com as mensagens enviadas para a ouvidoria Torfresma?

- As mensagens são recebidas pelo comitê de ética da Torfresma que analisa cada caso e toma as medidas necessárias.

As mensagens são anônimas?

- É possível colocar o nome ou deixar a mensagem anônima. De qualquer forma, a identidade da pessoa será mantida em sigilo.

Torfresma has established an Integrity and Ethics Committee whose purpose is to analyze and resolve issues related to the company's integrity, ethics and compliance. This committee will be dedicated to providing employees with the support and guidance they need to base their actions on the standards and principles established herein.

TORFRESMA

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