

	POLICY	PCT 022
	DONATIONS AND SPONSORSHIPS	Date: 07/31/23
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1. PURPOSE

The purpose of this Standard is to establish procedures for making donations and sponsorships at Tupy S.A. in order to adhere to the Company's ethical values and internal regulations, applicable legislation and the principles and practices for Corporate Governance to which Tupy is subject.

2. SCOPE

This Policy applies to the Management, Controlling Shareholders, Directors and members of Tupy's Audit and Advisory Committees and Employees, subsidiaries and other companies directly or indirectly controlled by Tupy, whether located in Brazil or overseas. It also serves to provide guidelines to any individuals, companies or entities with which Tupy maintains a relationship, including, but not limited to, suppliers, business partners and those benefiting from investments of any nature that are made.

3. REFERENCES

This Policy will adhere to provisions contained in the following list of documents, which is not exhaustive:

- i. Articles of Incorporation;
- ii. Code of Ethics and Conduct;
- iii. Policy for the Delegation of Authority;
- iv. Integrity Policy;
- v. Anti-Corruption and Anti-Bribery Policy.

4. DEFINITIONS

Public Official: political agents, public servants and any individual that exercises, even if temporarily or without remuneration, through means of election, appointment, nomination, contracting or by any other form of investiture or link, a mandate, position, employment or function within the Executive, Legislative and Federal, State and Municipal Judiciary.

Requesting Department: internal area at Tupy responsible for requesting the donation and/or sponsorship in question and relationship with the beneficiary.

Government Authority: means (i) any and all bodies, departments or entities of the direct, indirect or

foundational government exercising any of the Powers of the Union, the States, the Federal District, the Municipalities, the Territory, a company incorporated into public assets or an entity whose creation or funding the treasury has competed or competes with more than fifty percent of assets or annual revenue; and (ii) bodies, state entities or diplomatic representative bodies of a foreign country of any level or sphere of government, as well as legal entities controlled, whether directly or indirectly, by the Government of a foreign country or international public organizations, including sovereign-wealth funds or an entity whose ownership is constituted by a sovereign-wealth fund.

Preliminary Assessment: a series of verification acts that must be carried out before any donation or sponsorship, which aims to evaluate potential risks to the integrity of the respective beneficiary and its legal representatives.

Tax Benefit: benefit established by law that allows a Government Authority to reduce the amount of taxes owed by individuals and legal entities.

Statutory Board: executive administrative and representative body responsible for ensuring regular operations at the Company in accordance with the strategies and general orientations outlined by the Board of Directors.

Donation: the granting of money, materials and/or services to an institution, with or without the use of tax benefits, free of charge or, in other words, without any form of consideration¹.

Related Party: as defined under PCT 004 – Policy for Related-Party Transactions and Situations Involving Conflict of Interest.

Sponsorship: the granting of money, materials and/or services to a third party institution or project, with or without the use of tax benefits, and whose purpose, through counter performance, is to disseminate and promote Tupy's brand and strengthen Tupy's communication and relationship with its stakeholders.

Politically Exposed Person (PEP): all persons that, in the last five years, exercise or have exercised, whether in Brazil or overseas, any relevant position or public function or if they have, under these conditions, family members, representatives or even persons with which they maintain a close relationship in such a position - e.g.: Federal Representative, Senator, President of the Republic, Minister of State, Secretary of State, Governor, Mayor, State Representative and Councilor.

Tupy or the Company: refers to Tupy S.A., its subsidiaries and other companies directly or indirectly controlled by Tupy, whether located in Brazil or overseas.

¹ Exceptions to this concept include cases involving compensation provided under agreements and transactions under the terms of the law (e.g. donations made through a Conduct Adjustment Agreement - TAC).

5. GENERAL PROVISIONS

5.1 GENERAL GUIDELINES AND PROHIBITED DONATIONS AND SPONSORSHIPS

5.1.1 General Guidelines

All donations and sponsorships made by the Company must adhere to the following guidelines:

- The offering of donations on the part of Tupy must not generate any form of consideration and be carried out completely free of charge.
- Sponsorships must serve a legitimate and appropriate purpose compatible with the objectives that they seek to achieve. Legitimate and appropriate objectives for the granting of sponsorships include: (i) promoting the Tupy brand's positive reputation; (ii) strengthening Tupy's relationship with its target audience; and (iii) exercising social responsibility through initiatives focusing on education, the environment, health and diversity, equity and inclusion.
- Tupy will not grant donations to and sponsor initiatives that (i) promote any form of discrimination (whether based on religion, ethnicity, gender, ideology, among others); (ii) are incompatible with Tupy's ethical principles; (iii) may impact the Company's reputation; (iv) include content that runs contrary to the concept of human rights or favor degradation of the environment; and (v) involve obscene or offensive themes.
- Any requests for donation or sponsorship made to Tupy must be thoroughly analyzed by the departments involved as described in NCT 084 - Donations and Sponsorships Standard, accounting for the relevance of the contribution made, the potential existence of conflicts of interest and risks related to corruption, administrative misconduct and other similar offenses, as well as Tupy's reputation.
- Requests for donations and/or sponsorships made Related Parties will be submitted for approval from the Board of Directors after advance evaluation from *Compliance*.
- Advance evaluation from *Compliance* through the Preliminary Evaluation Report, approval from the Statutory Executive Board or the Board of Directors, and formalization of contractual instruments related to the donation or sponsorship, must take place prior to the donation or sponsorship materializing, being made concrete and/or delivered and must be duly documented, even if the intended donation and/or sponsorship does not come to be approved.
- All donations and sponsorships must be made through the execution of a contractual instrument that contains clauses aimed at combating corruption and money laundering, in

addition to a commitment to comply with Tupy's Code of Ethics and Conduct and PCT 013 - Anti-Corruption and Anti-Bribery Policy.

- Donations and sponsorships must preferably consist of materials, services and/or renovations, except for donations and sponsorships offering tax benefits, which may be made in the form of financial contributions.
- Donations and sponsorships constituting financial contributions, whenever applicable, will be made directly to legal entities through means of a deposit made to the bank account maintained by recipient entities.
- Donations and sponsorships involving amounts that exceed established levels for the Company's internal approval must be submitted for approval by the Board of Directors.
- If it is necessary to contract third parties to supply materials or services related to the donation or sponsorship, Tupy's Supply department will implement the quotation and supplier selection process according to the rules provided for in NCT 050 - Supply Standards and NCT 052 - Supplier Approval and Management Standard.
- The Requesting Department must maintain a record of all donation and sponsorship processes carried out by Tupy under its responsibility, including the formalization of requests, Preliminary Evaluation Reports, approvals, copies of the respective contractual instruments, rendering of accounts, and other documents that may be related to the donation or sponsorship.
- Procedures for donations and sponsorships, whether offering tax benefits or not, must comply with the provisions set forth in NCT 084 - Donations and Sponsorships Standard.

5.1.2 Prohibited Donations and Sponsorships

All donations and sponsorships made by the Company must adhere to the following prohibitions:

- Any donation or sponsorship that seeks to influence an individual, company, Government Authority, Public Official and/or Politically Exposed Person to make a decision in Tupy's favor or secure an undue advantage, even if such an undue influence or advantage is not achieved, is prohibited.
- Any disbursement or commitment made by the Company related to political activities and/or contributions of any nature to political parties is prohibited, whether made directly by Tupy or any third party claiming to be a representative of Tupy.
- In order to prevent conflicts of interest, it is prohibited to make donations or sponsorships directly to Tupy employees or members of their family or to organizations in which Tupy

employees or members of their family hold some form of equity interest and/or management powers, with the exception of emergency situations, such as natural disasters that are duly proven to have occurred in region in which Tupy maintains operations and assistance is provided by donating essential items.

- Make and/or maintaining donations and sponsorships provided to individuals or organizations that have a history of involvement or that may be involved in acts of corruption, money laundering, administrative misconduct and other similar offenses is expressly prohibited.
- Donations and sponsorships made on Tupy's behalf through means of third parties are prohibited.

6. RESPONSIBILITIES

6.1 BOARD OF DIRECTORS - CA

- a. Approve the Policy's guidelines and any revisions;
- b. Evaluate and propose updates/changes to the Policy;
- c. Approve donations and sponsorships that exceed the limits established by the Statutory Board;
- d. Supervise processes to ensure that the necessary resources are made available in executing this Policy.

6.2 STATUTORY AUDIT AND RISK COMMITTEE - CAE

- a. Assist the Board of Directors in approving the guidelines contained in this Policy and its revisions;
- b. Monitor development in terms of the Policy's degree of efficiency.

6.3 STATUTORY BOARD OF DIRECTORS

- a. Evaluate and propose updates/changes to the Policy;
- b. Approve donations and sponsorships within the limits of the Policy's scope;
- c. Establish expectations with regards to integrity, ethical values, transparency and responsibilities for compliance with the Policy;
- d. Ensure that the resources necessary for the execution of the Policy are provided.

6.4 SOCIAL RESPONSIBILITY

- a. Assume responsibility for the management, supervision and monitoring of donations and sponsorships constituting Social Investments;

- b. Evaluate the history of events and/or initiatives carried out by the recipient of the donation or sponsorship;
- c. Verify the good reputation of the recipient of the donation or sponsorship;
- d. Maintain a record of all donations and sponsorships made by Tupy that are under its responsibility, as well as the respective evidence and documents of each donation and sponsorship process.

6.5 INSTITUTIONAL RELATIONS

- a. Assume responsibility for the management, supervision and monitoring of donations and sponsorships made for institutional purposes;
- b. Verify the good reputation of the recipient of the donation or sponsorship;
- c. Maintain a record of all donations and sponsorships made by Tupy that are under its responsibility, as well as the respective evidence and documents for each donation and sponsorship process.

6.6 CORPORATE COMMUNICATION AND MARKETING

- a. Assume responsibility for managing, supervising and monitoring sponsorships made for the purpose of promoting Tupy's brand, products, image or reputation;
- b. Evaluate the history of events and/or initiatives carried out by the recipient;
- c. Verify the good reputation of the recipient of the donation or sponsorship;
- d. Maintain a record of all donations and sponsorships made by Tupy that are under its responsibility, as well as the respective evidence and documents for each donation and sponsorship process.

6.7 LEGAL DEPARTMENT

- a. Prepare contractual instruments related to donations or sponsorships.
- b. Assist the *Compliance* department, whenever required, in evaluating information contained in Preliminary Evaluation Forms.

6.8. COMPLIANCE DEPARTMENT

- a. Review Preliminary Evaluation Forms and implement additional due diligence processes in order to recommend whether or not the donation or sponsorship in question be made.

7. ACCOUNTABILITY PRACTICES

A failure to comply with the provisions contained in this Policy and other applicable policies will entail consequences according to the severity of the act performed and the parties involved.

- **Employees:** the application of disciplinary measures, as provided for under Tupy's Disciplinary Code (NCT – No. 010), which may range from a verbal warning to termination of the employment contract for just cause.
- **Third Parties or Intermediaries:** provision of a written warning/notification, filing of a report with competent bodies and suspension of the respective institutional and/or commercial relations.

Additionally, violation of this Policy, as well as related laws, may lead to both Tupy and the individuals involved being subject to criminal, administrative and civil proceedings.

8. EXCEPTIONS

Situations not provided for under this Policy must be submitted to the *Compliance* department for evaluation and subsequent reporting to the Statutory Audit and Risk Committee, and in turn the Board of Directors.

9. QUESTIONS AND CONCERNS AND MANIFESTATIONS

Questions and concerns regarding the application and interpretation of the guidelines established herein or decisions made in specific cases will be managed by Tupy's *Compliance* department through the email address compliance@tupy.com.br.

In cases involving suspected or confirmed conduct constituting a violation of any laws, regulations, the contents of this Policy or Tupy's Code of Ethics and Conduct, a statement must be made through one of the official Ethics Reporting Channels made available by the Company:

- Online Ethics Reporting Channel: www.tupy.com.br/etica;
- Form available at suggestion boxes distributed throughout Tupy's units;
- Email: etica@tupy.com
- Telephone Brazil: 0800 721 7895;
- Telephone Mexico: 800 288-0150;
- Telephone Portugal: 800 180 431.

Tupy's Ethics Channels are managed by an independent third-party company. All manifestations are evaluated, investigated and clarified on an individual basis through means of appropriate processes for taking action, guaranteeing the confidentiality of the information involved and preventing retaliations against whistleblowers, who may choose to report anonymously.

10. FINAL PROVISIONS

The content of this Policy will be modified exclusively with the Board of Directors' approval whenever deemed necessary by this body or as a result of regulatory changes.

Body Responsible	Department
Preparation	<i>Compliance</i>
Review	Statutory Executive Board and Audit and Risks Committee
Approval	Board of Directors
