

**MONEY LAUNDERING AND TERRORISM
FINANCING PREVENTION STANDARD**

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Approved by: Statutory Executive Board

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Revision 00

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HISTORY OF CHANGES

Revision 00: Initial Issue

1. OBJECTIVE

The purpose of this Standard is to establish the guidelines, rules and internal procedures to be observed by Tupy's Employees, Company representatives, as well as third parties related to it and authorized to act on its behalf, to identify and prevent operations that intend to use Tupy, directly or indirectly, as an instrument for money laundering or financing terrorism.

This Standard reflects Tupy's commitment to preventing and combating money laundering and terrorism financing in all its forms.

2. AREAS OF APPLICATION

This Standard applies to all Employees of Tupy and other companies under its control, directly or indirectly, in Brazil or abroad, to Company representatives and any other third parties that are related to or authorized to act on behalf of Tupy.

3. TRAINING

Not applicable.

4. REFERENCE DOCUMENTS

- I. CEC – Tupy Code of Ethics and Conduct.
- II. PCT 013 – Tupy Anti-Corruption and Anti-Bribery Policy.
- III. PCT 014 – Tupy Integrity Policy.
- IV. PCT 022 – Tupy Donations and Sponsorships Policy.
- V. Legislation related to the prevention of money laundering and combating the financing of terrorism, including, but not limited to, Law 9.613/1998 – Brazilian Law to Prevent and Combat Money Laundering; Law 12.683/2012 – Amends Law 9.613, of March 3, 1998, to make the criminal prosecution of money laundering crimes more efficient; Recommendations of the

Financial Action Task Force against Money Laundering and Terrorist Financing – FATF; International Convention for the Suppression of the Financing of Terrorism (1999 United Nations Treaty) – criminalization of acts of financing of acts of terrorism – Adopted by the United Nations General Assembly in Resolution 54/109 of December 9, 1999, other local applicable legislation.

5. COMPLEMENTARY DOCUMENTS

- I. NCT 001 – Tupy Payable Accounts Standard.
- II. NCT 003 – Corporate Standard for Customer Credit.
- III. NCT 052 – Tupy Supplier Approval and Management Standard.
- IV. NCT 084– Tupy Donations and Sponsorships Standard.
- V. ISU 020 - Registration and De-accreditation of Tupy Suppliers and Service Providers.
- VI. IT 9251– Tupy Supplier Due Diligence Work Instruction.

6. TERMS AND DEFINITIONS

Code of Ethics and Conduct: document that brings together the ethical principles and values that guide Tupy in conducting its business, in addition to serving as a guide to behaviors that must be observed by all Employees and Third Parties in internal and external relationships.

Employees: interns, apprentices, employees, Statutory Board, members of the Board of Directors and its Advisory Committees, created by statutory provision or otherwise, and members of the Supervisory Board.

Ethics Channels: the official channels made available by the Company to any and all individuals who wish to make a statement regarding a conduct of which they are aware or suspect that is contrary to a law, regulation, the Bylaws, Code of Ethics and Conduct or Tupy's internal policies and rules.

Money Laundering: set of commercial or financial operations carried out with the aim of incorporating resources, goods or services obtained illegally into the economy, giving them an apparently legal origin.

Politically Exposed Person (PEP): all people who, in the last five years, hold or have held, in Brazil or abroad, any relevant public office, job or function or if they have, in these conditions, family members, representatives or even people in their close relationship - e.g.: Federal Deputy, Senator of the Republic, President of the Republic, Minister of State, Secretary of State, Governor, Mayor, State Deputy and Councilor.

Terrorism Financing: process of distributing resources, goods or values with the aim of financing the planning, preparation or practice of terrorism.

Third Parties: any person, natural or legal, who maintains or intends to maintain commercial and/or social relations, direct or indirect, with Tupy (e.g. suppliers, customers, business partners, beneficiaries of donations and/or sponsorships etc.).

Tupy or Company: comprises Tupy S/A, its subsidiaries and other companies under its control, direct or indirect, in Brazil or abroad.

Unlawful Acts: any act prohibited by laws, regulations and/or internal policies of Tupy, contrary to ethical principles and intended to obtain an advantage, whether financial or not.

7. GENERAL GUIDELINES

Tupy, in the exercise of its functions, is committed to complying with the laws, especially those combating corruption, Money Laundering, violations of the economic order and Terrorism Financing. The same level of commitment is required of its Employees, representatives and Third Parties.

7.1. MONEY LAUNDERING AND TERRORISM FINANCING

Money Laundering consists of the act of concealing or disguising the nature, origin, location, disposition, movement or ownership of assets, rights or values originating directly or indirectly from criminal offense. The practice of Money Laundering is a crime that involves concealing the nature of assets, rights or values originating from conduct considered a crime or criminal offense and occurs in three distinct and independent stages:

- Placement: moment in which the value or asset originating from the illicit activity enters the economic system;
- Concealment: the moment in which multiple and complex operations are carried out with the value or asset introduced into the economic system, with the aim of disguising the illicit origin and making it difficult to reconstruct and monitor the illegal source of the values; and
- Integration: the moment when money is incorporated back into the economic system, with a legal appearance.

Terrorism Financing represents the process of distributing resources, goods or values with the aim of financing or subsidizing activities or organizations related, directly or indirectly, to the practice of terrorism.

In order to mitigate the risk of money laundering and terrorist financing within the Company, Tupy adopts criteria for hiring Third Parties in order to prevent and combat Money Laundering, Terrorist Financing and corruption. These criteria are set out in internal regulations, such as the Tupy Supplier Due Diligence Work Instruction.

Furthermore, knowing the customer is extremely important for the Company to carry out solid and safe commercial and financial activities. Adequate knowledge of customers minimizes the entry of capital originating from illicit activities into the Company.

Likewise, Tupy carries out the Third Party due diligence process with anyone considering a merger, acquisition, sale of a business unit, and beneficiaries of donations and sponsorships, in order to confirm that the Third Party has a history of integrity and has not been or is not currently involved in illicit practices, such as, for example, Money Laundering and/or Financing of Terrorism.

Additionally, Tupy remains attentive to the restriction lists of national and international bodies regarding Money Laundering and Terrorist Financing, in order to maintain business only with reputable parties.

Tupy expects Third Parties with whom it maintains relationships to also act with the highest standards of management and authentic records of all payments made or received by the Company, in order to ensure that the origin of the funds is lawful and that there is no risk that their assets or transactions are related to Money Laundering or that they are used to finance terrorism.

Tupy's Employees are expressly prohibited from concealing or disguising the nature, origin, location, disposition, movement or ownership of assets, rights or values arising, directly or indirectly, from criminal offenses, as well as from participating in any stage of the conversion of illicit assets into licit ones. In the same sense, Tupy Employees must not use or accept, during the performance of their activities at Tupy, assets, rights or values that arise from criminal offenses.

Furthermore, Tupy's Employees may not allocate assets or resources of the Company or related to Tupy to any illegal acts, in particular the financing of terrorism.

Tupy's Third Parties and Employees, in the performance of their duties, must be alert to suspicious actions that may indicate signs of Terrorism Financing or Money Laundering. If they have reason to believe or suspect that any actual or potential transaction involves the proceeds of criminal conduct, they must immediately notify Tupy's Compliance area, directly or through the Ethics Channels provided, so that there can be an effective investigation and identification of the irregularity and, if the conduct is confirmed, the adoption of the necessary measures.

Suspicious transactions include, but are not limited to:

- Transactions that raise reasonable suspicion of the involvement of amounts or assets derived from crimes, regardless of the amount involved;
- Operations that appear to have been carried out in circumstances of unusual complexity, unjustified or without apparent economic rationality;
- Operations that did not follow the normal contracting flow;

- Operations carried out with companies that do not have headquarters or share capital consistent with the products or services offered;
- Operations that do not comply with the approval authority regimes or that do not have an invoice detailing the product or service and with due proof of delivery of the product or provision of the service by the appropriate area;
- Donations and/or sponsorships to beneficiaries who have not undergone the Due Diligence process, as established in the Donations and Sponsorships Policy and Standard;
- Transactions that raise reasonable suspicion of involvement in the financing of activities related to terrorism or any other criminal practice.

If necessary, Tupy will report the suspicious transaction to the competent authorities and will collaborate to clarify and investigate any harmful acts related to the practice of Money Laundering and Terrorism Financing, in compliance with current legislation.

7.2. INVESTIGATIONS AND CONSEQUENCES MANAGEMENT

Tupy is committed to thoroughly investigating all reports received, acting diligently during the investigation and imposing the applicable penalties for unlawful acts, omissions or other actions that may be considered harmful to the Company or Third Parties, in addition to communicating and cooperating with the authorities whenever necessary.

Tupy encourages and requests that Employees and Third Parties immediately report any act or suspicion concerning Tupy that may constitute a violation of its policies, Code of Ethics and Conduct and/or current legislation.

Failure to comply with the provisions of this Standard may result in consequences, depending on the severity of the act committed and the parties involved.

Furthermore, violation of this Standard, as well as related laws, may lead to the initiation of criminal, administrative and civil proceedings against those involved.

8. DUTIES AND RESPONSIBILITIES

8.1. CEO/Statutory Executive Board

- a. Approve this Standard and its revisions;
- b. Ensure that the actions, projects and programs executed in their respective directorates are in compliance with the rules established in this Standard;
- c. Adopt measures to engage and promote a culture of combating Money Laundering and Terrorist Financing in all its forms.

8.2. Compliance

- a. Clarify any doubts related to this Standard;
- b. Assist in combating Money Laundering and Terrorist Financing in all its forms;
- c. Communicate to Employees the rules established in this Standard, in order to mitigate the risk of illegal acts being committed in their businesses;
- d. Carry out background checks on Third Parties, including consulting restriction lists;b
- e. Keep a record of cases involving the practice of illegal acts described in this Standard that come to its attention, as well as the procedures taken;
- f. Recommend the revision of this Standard whenever necessary.

8.3. Employees

- a. Observe and ensure compliance with this Standard, as well as the provisions of the Tupy Code of Ethics and Conduct;
- b. Contact the Compliance area for consultation on situations that conflict with this Standard or upon the occurrence of situations described therein, when necessary;
- c. Report any potential violations of laws and regulations, the Code of Ethics and Conduct, or this Standard.

8.4. Managers

- a. Ensure that your team is aware of the rules established in this document, in order to avoid misconduct within the scope of their responsibilities;
- b. Whenever there are situations in your area that involve the practice or suspicion of acts contrary to this Standard, declare or instruct your team to declare the situation to the Compliance area;
- c. Evaluate the application of disciplinary measures to team members who fail to comply with this Standard.

8.5. Third Parties

- a. Observe and ensure compliance with this Standard, as well as the provisions of the Tupy Code of Ethics and Conduct;
- b. Contact the Compliance area for consultation on situations that conflict with this Standard or in the event of situations described therein, when necessary;
- c. Report any potential violations of laws and regulations, the Code of Ethics and Conduct, or this Standard.

9. REPORTS

Tupy provides channels (Ethics Channels) through which anyone can make a statement in the event of knowledge or suspicion of conduct that is contrary to a law, regulation, the content of this Standard or the Tupy Code of Ethics and Conduct:

- Online Ethics Channel: www.tupy.com.br/etica;
- E-mail: etica@tupy.com
- Telephone Brazil: 0800 721 7895;
- Telephone Mexico: 800 288-0150;
- Telephone Portugal: 800 180 431.

The Ethics Channels are managed by an independent third party company. All reports are assessed, investigated and clarified individually through the appropriate processes for taking action, ensuring the confidentiality of the information and non-retaliation against the whistleblower, who may choose to make the report anonymously.

10. INTERNAL INVESTIGATIONS AND SANCTIONS

All complaints will be investigated and dealt with. If a violation of the provisions of this Standard, the law, regulations or the Tupy Code of Ethics and Conduct is proven, the Company may apply sanctions, which may result in the termination of the employment or commercial contract, as the case may be, without prejudice to Tupy being able to adopt any legal measures it deems necessary.

11. FINAL PROVISIONS

Any questions or controversies regarding this Standard should be addressed to the Compliance area via email: compliance@tupy.com. This Standard may be changed at any time, depending on the need identified by the areas involved and approval by the Statutory Executive Board.

12. SYMBOLS AND ABBREVIATIONS

Not applicable.

