



ANTI-CORRUPTION POLICY

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INTRODUCTION

According to the applicable laws, KARINA may be held liable for the conduct of Employees and Third Parties if it fails to take the necessary measures to avoid the practice of acts that violate anti-corruption laws, regardless of KARINA's knowledge of such conduct.

Karina Indústria e Comércio de Plásticos Ltda. ("KARINA"), thus, publishes this Anti-Corruption Policy as a fundamental part of its Compliance Program. This Policy aims to guide the conduct of KARINA's Employees and certain Third Parties with whom it relates, avoiding the practice of inappropriate or illegal conduct, in compliance with KARINA's values, principles and mission. This Policy establishes standards of conduct that guide KARINA's internal and external relations, stimulating an ethical, integral and transparent work environment.

This Policy applies indistinctly to all Employees regardless of the position held in KARINA. The provisions contained in this policy are complementary to the general provisions contained in the Code of Ethics and Conduct.

The terms below have the following definitions, for the purposes of this Anti-Corruption Policy and in the context of our Compliance Program:

PUBLIC AGENT: any employee or agent who works in state or mixed-capital entities or belongs to the Executive, Legislative or Judicial Branch, national or foreign. This definition is broad and includes any person acting for or on behalf of Brazil, or any country, in any department, agency or representative of its government, or international organization. A third person related to them is considered to be anyone who can influence the decisions of the Public Agent.

GIVEAWAYS: items with no market value, usually with some sign or logo that identifies a business or company, in order to promote it, such as: pens, notepads, calendars and others.

EMPLOYEES: all employees and collaborators, administrators and directors of KARINA without distinction.

COMPLIANCE COMMITTEE: internal body instituted by KARINA, responsible for the Compliance Program and its application.

COMPLIANCE: commitment to obey and respect KARINA's ethical precepts, local legislation and Compliance Program, which comprises the policies and standards (internal and external) that Employees must adopt in all KARINA's businesses.

COMPETITORS: people or companies that meet the same needs of KARINA's customers,

CORRUPTION: promise, offer, donation or receipt, directly or indirectly, of any undue advantage or bribe that is aimed at obtaining any benefit of any kind for KARINA, and/ or for others and/or personally.

ENTERTAINMENT: meals, seminars, conventions, invitations and/ or tickets to sporting, cultural or social events, as well as all those preparations or similar courses.

CONFIDENTIAL INFORMATION:

any information that has not been disclosed to the public.

POLITICALLY EXPOSED PERSONS

(PEPs): for the purposes of this Policy, personal PEPs are those who hold or have held positions, jobs or public functions in the last 5 (five) years, whether in Brazil or abroad. The concept is also extended to representatives, family members (up to 2nd degree) and close employees.

GIFTS: items with market value, for personal use, such as wine bottles, baskets with fine items, bags, ties, etc.

COMPLIANCE PROGRAM:

set of internal mechanisms and procedures for integrity, auditing and encouraging the reporting of irregularities, containing policies and guidelines with the objective of predicting, detecting and remedying deviations, frauds, irregularities and illegal acts practiced against the public administration, national or foreign; and fostering and maintaining a culture of integrity in the organizational environment. Unless otherwise specified, any reference

to the Compliance Program should be understood as references to KARINA's Compliance Program.

BUSINESS MEALS: meetings at restaurants for lunches or dinners.

BRIBERY: payment, promise, or offer of money to Public Agencies, PEPs or Third Parties or receipt of payment or money from any of these persons, with the intention of guaranteeing some Undue Advantage.

THIRD PARTY: any person or company with whom KARINA has a relationship or contract, such as suppliers, service providers, agents and associates, business partners and customers.

UNDUE ADVANTAGE: obtaining a favoritism of a non-commercial nature (e.g. avoiding a tax) or of a commercial nature, such as guaranteeing, obtaining or maintaining business; tolerance with respect to the applicable standards, and any decision or activity that has a direct or indirect impact on KARINA's business interests.

3. Compliance with Laws, regulations and internal rules

KARINA values respect for the rules, regulations and laws to which it is subject, in particular the Anti-Corruption Law (Law no. 12.846/2013), the Penal Code (Decree-Law no. 2.848/1940), the Misconduct Law (Law no. 8.249/92) and the guidelines provided for in this Policy, in the Code of Ethics and Conduct and other specific policies of KARINA.

KARINA undertakes to cooperate with the regulatory and supervisory authorities, promptly responding, whenever appropriate, to requests addressed to it.

4. Leadership engagement It is up to KARINA's Employees in management positions (Directors, Managers, Supervisors, Coordinators, Leaders) to ensure that their subordinates, contractors or Third Parties with whom they relate on behalf of KARINA acknowledge and apply the provisions of this Anti-Corruption Policy. Employees in management positions must be an example of conduct to be followed, acting through the promotion and demonstration by the example of ethical behavior

and integrity expected of KARINA's Employees

5. Confidentiality and protection of KARINA's assets

All Employees must maintain confidentiality about any Privileged Information they may become aware of due to the activities carried out at KARINA.

Information in general is patrimonial assets of great importance. If improperly disclosed, they can cause losses, as well as put KARINA in a competitive disadvantage, causing financial losses and even causing damage to its image. KARINA's proprietary information may only be disclosed with the prior authorization of the Presidency and/or Vice-Presidency. This rule must also be maintained after termination of the employment contract and for life.

6. Prohibition of Corruption Practices

KARINA does not tolerate the practice of acts harmful to the Public Administration, national or foreign. It is strictly forbidden to provide, offer or give, directly or indirectly, undue advantage,

including anything of value, the Public Agent or the third party related to it, with a view to obtaining favoritism. KARINA and its Employees will not pay or receive bribes. It is important that Employees are aware of the following situations:

- Unusual forms or complex patterns of payment, including unusual transfers to/ from countries unrelated to the transaction;
- Customers and/or suppliers with operations that appear to have little integrity; or who are anxious to avoid the requirements for recording information;
- Transactions involving locations associated with "money laundering" or tax evasion;
- Transactions whose values are incompatible with the professional occupation, history of operation, or declared financial situation, or with the market value reasonably attributable to the transaction attempted;
- Transactions whose characteristics and/or developments show action on behalf of third parties;

- Transactions that show sudden and unjustified changes in relation to the operational modalities usually used by those involved;

- Transactions carried out with the purpose of generating loss or gain for which, objectively, there is no economic basis;

- Resistance to provide information necessary for customer registration; declaration of several bank accounts or frequent and repeated modification of accounts; opening and information of account with authorization of attorney-in-fact without apparent link with the holder.

7. Rules of relationship with the Government (Public Agents and PEPs)

Within the scope of KARINA's activities, it is normal that there are interactions with Public Agents to obtain licenses, permits, authorizations and other acts necessary for operations. When interacting with the Government, Employees must always be guided by the law and regulations and KARINA's Policies

Only Employees and Third Parties

authorized by the Board of Directors (e.g. brokers, lawyers, just to name a few) may act on behalf of KARINA in interaction with

Public Agents. In the case of such Third Parties, they must follow the laws and regulations and guidelines contained in this Policy.

The provision of information to all spheres of government and all powers (Executive, Legislative, Judiciary Branch), including municipal, state and federal public agencies, must be made in writing, by means of a protocol (physical or electronic, as applicable) and with the proper guidance of the Legal Management, whenever there is a risk situation involved.

Contacts and meetings with Public Agents must be registered internally and follow the specific procedures defined in KARINA's Compliance Program. Employees may not use KARINA's name to deal with personal matters with the Government.

8. Rules of relationship with Third Parties (customers, suppliers, competitors, partners)

KARINA prohibits its Employees and Third Parties from engaging in conduct prohibited by the legislation in force, especially by Brazilian anti-corruption legislation. KARINA must actively act to prevent Third Parties from practicing an act that violates anti-corruption laws, regardless of whether KARINA is aware of such practices or not.

KARINA's Employees must inform Third Parties about the principles and standards contained in this Anti-Corruption Policy and in the Code of Ethics and Conduct.

The hiring of Third Parties by KARINA must observe the procedures defined in the relevant documentation of the Compliance Program. Contracts entered into with Third Parties will contain clauses that determine compliance with anti-corruption legislation and will be subject to a declaration of awareness and compliance with this Policy and/or KARINA's Code of Ethics and Conduct. Contracting and commercial relations with Third Parties

that follow the ethical and transparency standards defined in KARINA's Compliance Program should be prioritized. In the relationship with Competitors or in the context of meetings of industry associations or any event or meeting with Competitors of which any KARINA Member is part, no competitively sensitive matters should be discussed, such as, for example, prices, costs, negotiations with customers or suppliers, participation in bids (including when the participation is by customers or suppliers).

The Employee must also not act, alone or together, in order to divide markets, customers or territories; fix prices; refuse to negotiate with a customer or supplier without validated legitimate reason, or practice any other anticompetitive conduct.

If any of these matters come to light in the context of conversations or meetings with Competitors, KARINA's Employee must immediately withdraw from the place and request the registration of their manifestation contrary to the discussion, if possible. In this situation, the Employee must report what happened to the Compliance Committee.

9. Political-Partisan Contributions

KARINA does not make political-partisan contributions and does not allow any Employee or Third Party to make political-partisan contributions or make political-partisan manifestations on behalf of KARINA. KARINA respects and ensures the individual freedom of its Employees, who may carry out their political activities in their own name (but not in KARINA's name).

10. Conflicts of interest Conflicts of interest occur when the personal interest of an Employee interferes or has the power to interfere in the performance of their work objectively, to the detriment of KARINA's interest. The decisions and activities of KARINA's Employees must be practiced in the best interest of KARINA.

In the event of a potential conflict of interest, the Employee must promptly form the Compliance Committee to obtain clarification or guidance on how to proceed.

The following situations are examples of conflicts of interest:

- Employees who have participation or interest in a

competitor company or in a company that has or may have business or contracts with KARINA;

- Employees who have a relative or close persons who work or participate in a competing company or in a company that has or may have business or contracts with KARINA;
- Work in an activity outside KARINA, or use working hours for various matters, impairing the performance of their activities at KARINA;
- Use your influence, position or information obtained in your work at KARINA to obtain personal support or for Third Parties.

11. Gifts, giveaways and entertainment

The offer and receipt of Gifts, Giveaways, Business Meals and Entertainment is a common practice in certain business environments. The provisions of this Policy are intended to prevent such situations from appearing or constituting the offer or receive an Undue Advantage.

Gift and Entertainment Offers may not be used to influence decisions of Public Agents or Third Parties in favor of KARINA, nor serve as compensation for the decision, act, action or omission of a Public Agent or Third Parties. Expenses with Gifts and Entertainment to Public Agents are prohibited, except for Giveaways, without commercial value, in which preferably KARINA's brand is covered. These will only be acceptable if they cannot be understood as a form of influence, bribery or corruption.

Gifts received by Employees from Third Parties involved with KARINA, except by means or lodging justified for business reasons, as approved by the Compliance Committee, may not exceed the estimated amount of R\$ 500.00. (U\$ 100)

If Gifts to be received by Employees exceed the above amount, the Employee must refuse the gift and inform the Third Party about KARINA's policies. If the refusal is not justifiably feasible, the Compliance Committee must be informed and will have the prerogative to allow the

gift or give it away (in a raffle between team members, for example).

12. Donations and sponsorships

KARINA may make donations and sponsorships to foster and/or develop a social, environmental or cultural purpose aimed at the community in which it operates or for society.

Donations and sponsorships must respect the Code of Ethics and Conduct and be previously approved by the Compliance Committee, and a procedure for prior verification of the beneficiary can be carried out, so that there is no conflict of interest, there is no Undue Advantage and in order to evaluate the reputation and adequacy of the beneficiary to KARINA's principles.

13. Violations

Violations of this Policy will subject the offending Employee to the disciplinary sanctions provided for in the legislation in force, including the application of termination for just cause, depending on the seriousness of the fact.

The alleged offender will have the opportunity to be heard by the Compliance Committee. The application of sanctions will consider the seriousness of the infraction, possible recurrence; and any damages caused or that

could be caused to KARINA, including with respect to proving KARINA's integrity, work environment and image before third parties.

14. Reporting Channel

KARINA is open to receiving reports about non-compliance with the Code of Ethics and Compliance, this Anti-Corruption Policy or any other policy or proceeding of KARINA. KARINA maintains a channel for receiving internal and external complaints. The Reporting Channel is autonomous and impartial, managed exclusively by an independent service provider.

KARINA guarantees (i) the possibility of anonymous contact; (ii) the confidentiality and professionalism of the investigation process; (iii) the impartiality of decisions; and (iv) that no form of retaliation will be tolerated for those who use the Reporting Channel in good faith.

It is forbidden to file complaints with the intention of harming someone or with any initial motivation, and the violators of these prohibitions are subject to the application of foreseen sanctions.

15. Compliance Committee

The Compliance Committee has the authority and independence to enforce compliance with this Anti-Corruption Policy and other policies, investigate violations and impose applicable disciplinary sanctions. The Compliance Committee will be regulated by its own Internal Regulations. The Compliance Committee must disseminate this Policy, clarify doubts and guide on its compliance.

16. Declaration of compliance

KARINA Members must periodically reaffirm their compliance with this Policy and the applicable anti-corruption legislation by means of a declaration of compliance, to be submitted annually to the Compliance Committee.

17. Revisions to the Anti-Corruption Policy and final provisions

This Policy will remain in force for an indefinite period, and must be reviewed periodically by the Compliance Committee, at least every two years, subject to approval by the Executive Board. The conduct guidelines contained herein will be disclosed to all KARINA Employees in periodic training and other informational materials. Cases and situations not provided for in this Policy will be submitted to the Compliance Committee for assessment and applicable definitions