



**KARINA**

CODE OF  
**ETHICS AND CONDUCT**  
FOR SUPPLIERS



## 1) Objective, Purpose, Scope and Principles

KARINA's goal is to enable a more sustainable and resource-efficient future with our innovative product development leadership. To maintain its purpose, KARINA is committed to maintaining the highest standards of integrity and transparency and to complying with all applicable laws and regulations in its business operations worldwide. Given that the conduct of KARINA's suppliers has a significant impact, it is required that all suppliers comply with legal standards and values similar to KARINA's.

As a supplier to KARINA, you must comply with all applicable laws and regulations wherever you operate; observe the principles reflected in KARINA's Code of Ethics and Conduct and meet the requirements set forth in this Supplier Code as well as your contractual obligations to KARINA.

This Code defines the minimum standards of ethical, legal and socio-environmental behavior expected from suppliers, service

providers, consultants, representatives, subcontractors and other business partners who work with KARINA, in Brazil and abroad.

Principles: integrity, legality, respect for people, sustainability, transparency, fair competition and safety.

## 2) Legal and Regulatory Compliance

Suppliers must fully comply with applicable laws and regulations (labor, social security, tax, environmental, sanitary, international trade and anti-corruption), in addition to the policies and procedures contractually agreed with KARINA, and ignorance of the law is not a justification for non-compliance.

## 3) Integrity, Anti-Corruption and Money Laundering

KARINA does not admit any and all forms of corruption and money laundering, as well as the offer and receipt of undue advantages of any kind, in the conduct of business, and suppliers must prevent the occurrence of such illegal behavior, combating corruption and fraud, in



addition to avoiding conflicts of interest in relations with the government, the private sector and/or organized civil society. Among the expected conduct of suppliers, we highlight:

a) Do not offer undue advantage, directly or indirectly, to public agents or third parties related to them.

b) Not to finance, fund, sponsor or in any way subsidize the practice of unlawful acts provided for by law.

c) Prevent and combat money laundering and terrorist financing; apply due diligence to counterparties and suspicious transactions.

d) Do not use an individual or legal entity to hide or disguise real interests or the identity of the beneficiaries of the acts performed.

e) Do not hinder the investigation or inspection of public agencies, entities or agents, or interfere with their performance, including within the scope of regulatory agencies and supervisory bodies of the national financial system.

f) Comply with free competition/antitrust laws; anticompetitive practices (cartel, sensitive exchange of information, manipulation of bids) are prohibited.

#### **4) Gifts, Presents and Entertainment**

Gifts, presents and forms of entertainment offered or received from people or companies that maintain a business relationship with KARINA are, as a rule, allowed as long as they have moderate value in accordance with its Code of Ethics and Conduct, are compatible with the professional relationship and do not generate any perception of impropriety, and the offer or receipt of cash values is expressly prohibited.

In addition, it is not allowed to give, promise, offer, receive, facilitate, make or authorize gifts, presents or entertainment to public agents for the purpose of obtaining any type of undue advantage. KARINA expects its Suppliers, before granting gifts, presents or entertainment, to ensure that such practices are in line with market uses and customs, as well as in compliance with applicable legislation, pre-



venting situations that may characterize inappropriate conduct.

## 5) Human Rights, Decent Work and Diversity

KARINA reaffirms its commitment to the promotion and protection of internationally recognized human rights, as well as not participating in any practice that results in their violation. In line with the principles of the United Nations Global Compact, the company supports and respects the Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

It is essential that KARINA's suppliers observe and respect these rights, fully complying with applicable national and international laws, in addition to adopting good governance practices aimed at protecting these rights. Suppliers must also comply with all labor and social security rules and regulations in force, ensuring their employees decent working conditions, adequate control of working hours and full respect for the rights guaranteed by law.

KARINA practices and encourages fair, adequate and decent working conditions for its employees, as well as third parties who work in its facilities, not admitting violations of rights or collective agreements and agreements, and its SUPPLIERS are also committed to such practices, declaring to act actively to:

- Eliminate forced or compulsory labor, including in conditions analogous to slavery;
- Eradicate child labor;
- Combat the sexual exploitation of children and adolescents;
- Ensure the right to free association and collective bargaining.

Suppliers must also promote respect for diversity, and any forms of discrimination, prejudice or favoritism are prohibited, regardless of ethnicity, skin color, religion, culture, age, gender, political conviction, nationality, regional origin, marital status, sexual orientation or physical and intellectual condition.

## 6) Health and Safety

Suppliers must provide their



Employees with decent working conditions with regard to workload, health and safety, always respecting the applicable labor legislation since everyone has the right to work in a safe and healthy environment; to this end, they must:

- a) Strictly obey all laws, regulations and procedures on occupational health and safety;
- b) Not to adopt dangerous or illegal behavior, including any acts, threats or violence;
- c) Establish adequate organizational structures and procedures for the effective management of health and safety risks and impacts, in accordance with applicable legislation;
- d) Implement effective control measures and define objectives and targets to mitigate risks and reduce such impacts;
- e) Ensure that all workers are sufficiently aware of these risks and properly trained on these measures to control and reduce impacts;
- f) Not to carry, distribute or be

under the influence of illicit substances while in the work environment or conducting business; and

- g) Do not carry or use any type of weapon or any type of flammable material foreign to the work environment, unless expressly authorized;
- h) Collaborate with KARINA, when requested, with the information or proof of compliance with such health and safety standards.

## **7) Environment and Climate**

KARINA expects its suppliers to fully comply with the applicable environmental management standards and references and that they are duly compliant with all licensing, authorization and other documentary requirements for carrying out productive, logistical and operational activities and that they observe:

- a) The environmental legislation in force, as well as the rules applicable to its products and services;
- b) The development of actions



aimed at eco-efficiency and cleaner production, focusing on reducing the consumption of natural resources, such as water, energy and other inputs, as well as reducing waste generation;

c) The adoption of measures for the management of greenhouse gas emissions, including the monitoring, control and reduction of these emissions;

d) The structuring of environmental management with clear targets for mitigating impacts (energy, GHG, water and waste) and circularity practices (reduction, reuse and recycling), collaborating, when requested, with the provision of environmental data and declarations;

e) Encouraging the adoption of certifications and practices recognized in the market, when applicable.

## **8) Information Security and LGPD**

KARINA's suppliers must adopt appropriate information security measures in order to ensure the confidentiality, integrity and

availability of KARINA's information in the context of the provision of services or the supply of products.

KARINA's information may not be accessed by unauthorized third parties, nor should documents containing confidential data be shared with such third parties without KARINA's prior and express authorization.

All information made available or obtained on behalf of KARINA must remain updated, and any form of undue alteration is prohibited.

KARINA's information must be accessible whenever necessary in order to avoid damage or losses arising from the unavailability of data in a timely manner for business processes.

The protection of personal data of KARINA's employees, candidates and business partners is extremely relevant, therefore, suppliers are expected to adopt the same level of care and responsibility regarding the protection of the personal data of their employees, business part-

ners and collaborators, ensuring full compliance with the General Personal Data Protection Law (LGPD).

## 9) Communication, Media and Brand Use

The SUPPLIER is prohibited from disclosing, reproducing or sharing any information, documents, projects, contracts, strategic data or institutional materials related to KARINA, as well as the use of its brand, business name, logo or any other distinctive signs, without the prior and express formal authorization of KARINA.

KARINA's suppliers must adopt a strictly institutional stance in the conduct of social networks, digital channels or any media, refraining from publishing, commenting or sharing confidential, sensitive or non-public information, even indirectly or partially.

Failure to comply with these guidelines may give rise to the adoption of appropriate administrative, contractual and legal measures, without prejudice to other sanctions provided for in the signed instruments or in the

applicable legislation.

## 10) Reporting Channel

KARINA has a Reporting Channel, which analyzes and directs, in a transparent and impartial manner, any ethical issue that reflects in this Code of Ethics and Conduct for Suppliers, as well as violations of laws, regulations, policies and other internal rules.

KARINA's suppliers may and should use such a Reporting Channel, in cases of doubts related to the content or application of this Code of Ethics and Conduct for Suppliers or if irregularities are observed:

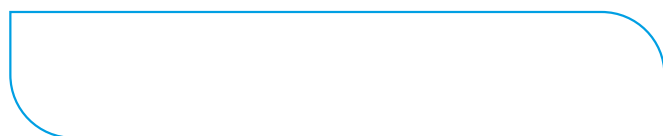
## 11) Consequences for Non-Compliance

Failure to comply with this Code may result in formal warning, suspension, disqualification, contractual termination for just cause, indemnities and/or any applicable administrative or judicial measures.



## 12) Governance, Review and Term

This Code is an integral part of contracts, purchase orders and supplier qualification processes and will be reviewed periodically by the responsible area or may be updated at any time, upon communication to suppliers.



[compliance@karina.com.br](mailto:compliance@karina.com.br)  
**0800 517 1208**



## Annex I — Term of Acknowledgement and Commitment of the Supplier

I declare, as legal representative of \_\_\_\_\_  
\_\_\_\_\_

CNPJ \_\_\_\_\_, that I have read, understood and undertake to comply with **KARINA's Code of Ethics and Conduct for Suppliers**, ensuring that all employees, agents, subcontractors and partners involved in the contractual scope also comply with it.

I further undertake to immediately report any violations or suspected violations; cooperate with audits and promptly implement any requested corrective action plans.

**Place/date:** \_\_\_\_\_  
\_\_\_\_\_

**Signature/Name/Title:** \_\_\_\_\_  
\_\_\_\_\_