

# GIFTS, GIVEAWAYS, AND HOSPITALITY POLICY

## CARMELO FIOR COMPANIES



### 1. PURPOSE

It is essential that such activities be properly regulated to prevent favoritism and undue advantages among parties. Accordingly, the gift and hospitality policy adopted by the Carmelo Fior Companies aims to establish clear rules for the offering and acceptance of gifts, presents, and hospitality by employees of the Carmelo Fior Companies, as well as to guide third parties and business partners regarding the internal rules of the Carmelo Fior Companies. In jurisdictions where specific laws are more stringent than the provisions established herein, such laws shall prevail.



### 2. SUPPORTING DOCUMENTS

- Code of Ethics and Conduct
- Compliance Code
- Anti-Corruption Policy



### 3. DEFINITIONS

- **Gifts:** Items with no commercial value, such as office supplies, calendars, t-shirts, etc.
- **Presents:** Items intended for personal use and with market value, generally unbranded, offered as a form of gratitude or favor. Examples include alcoholic beverages, gift baskets, entertainment invitations to concerts, movie screenings, theater performances, among others, typically high-value items.
- **Hospitality:** Includes transportation, accommodations, meals, tickets, and other forms of reception offered for specific occasions. Leisure-related trips and other concessions are considered presents.



#### 4. SCOPE

The anti-corruption policy adopted by the Carmelo Fior Companies applies to all employees, interns, contractors, service providers, consultants, partners, representatives, suppliers, and any other third parties acting on behalf of the company or representing its interests.



#### 5. PRINCIPLES

The offering, acceptance, or provision of gifts and hospitality must always adhere to the following principles:

- Both the act of offering and the act of receiving gifts or hospitality must never aim to obtain or result in any undue advantage between the parties, nor seek to influence any decisions, regardless of the monetary value involved;
- The frequency of offering to the same partner must not be excessive so as to avoid the appearance of an undue advantage or an attempt to influence decision-making;
- The acceptance of cash or any form of monetary payment (including any other means of financial transaction) is strictly prohibited.



#### 6. IMPROPER PAYMENTS AND ADVANTAGES

Any payments or offers made by employees, contractors, service providers, consultants, sales representatives, or suppliers with the intention of obtaining advantages or causing the express or tacit breach of applicable rules are strictly prohibited.

##### Examples of prohibited conduct include:

- Offering gifts with a nominal value exceeding USD 20.00 (twenty United States dollars) ;
- Engaging a third-party intermediary to conduct business with government entities (such as appointing someone responsible for government relations) without prior approval from the General Director, as applicable, and without consulting the Compliance Department;
- Financing political campaigns;
- Engaging in electoral advertising.

- Bribery of any kind;
- Political contributions;
- Personal promotion of public officials;
- Nepotism;
- Violation of mandatory cooling-off periods;
- Use of the Carmelo Fior Companies' name beyond the limits of one's authority or delegation;
- Sharing of sensitive information belonging to the Carmelo Fior Companies with third parties, including any information not considered public domain.

In case of doubt, contact the Compliance Department.



## **7. GIFTS AND PRESENTS**

The Carmelo Fior Companies do not allow their employees to accept gifts, giveaways, trips, or any other incentives from suppliers that may influence or appear to influence decision-making within the organization. Likewise, employees of the Carmelo Fior Companies are not permitted to receive commissions or any form of payment from suppliers.

The receipt of cash in any form—including checks, deposits, transfers, or equivalents—is strictly prohibited, as is the payment or receipt of bribes, kickbacks, or any other illegal payments.

Business lunches, dinners, and similar outings—including but not limited to sports or cultural events such as theater performances, concerts, dance shows, and other entertainment activities—are permitted, provided they occur in the ordinary course of business and do not create any undue influence on business decisions.

Additionally, any marketing initiatives involving the organization or participation in events, the offering of giveaways, gifts, experiences, or hospitality must be previously authorized by the Executive Board of the Carmelo Fior Companies.

The offering of gifts and/or presents to employees of the Carmelo Fior Companies is only permitted if of nominal value, not exceeding USD 20.00 (twenty United States dollars).

Accordingly, any gifts or giveaways offered with a value exceeding USD 20.00 (twenty United States dollars), regardless of the identification of the intended employee recipient, must be declined at the time of delivery. If refusal is not possible, the employee in question must report and forward the item to the Compliance Department, which will be responsible for the appropriate handling of the matter.



## **8. MEALS**

Meals with clients and other business partners are part of regular business activities and are permitted by the Carmelo Fior Companies, provided the following guidelines are observed:

- Meals must be directly related to the business of the Carmelo Fior Companies and may not serve personal interests of those involved;
- The costs must be reasonable, avoiding extravagance, and should be consistent with standard business meal practices according to local norms;
- Meals should not include spouses or other related individuals unless they are directly involved in the business purpose of the meeting;
- The consumption of alcoholic beverages during meals with clients and business partners must comply with the Internal Standards and Policies of the Carmelo Fior Companies regarding meal expense coverage.

Any events, lunches, or dinners that do not fully comply with the criteria outlined above must be submitted to the Compliance Department for prior review.



## **9. TRADE FAIRS, EXPOSITIONS, AND OTHER EVENTS**

In events, trade fairs, and expositions where the Carmelo Fior Companies are participants or sponsors, tickets may be provided to business partners or potential partners, subject to prior approval by the Marketing Department management. In other cases, where the Carmelo Fior Companies are merely interested parties, offering tickets to business partners requires prior approval from the Compliance Department.

The Carmelo Fior Companies may accept invitations from third parties to attend technical events of any value (e.g., lectures, conferences, trainings), provided such invitations are extended on an institutional basis (i.e., not addressed to specific individuals) and are approved by the Executive Board. The selection of employees to attend such events must be made by the manager of the relevant department, based on the roles and responsibilities of each employee.

## **10. TRAVEL AND ACCOMMODATION**

When the travel and accommodation expenses of third parties are related to events supported or organized by the Carmelo Fior Companies, approval by the Marketing Department management shall be sufficient, with no requirement for additional internal approval from an independent area (e.g., Compliance).

In cases where the obligation to cover travel and accommodation costs is established in a contract, no internal approval will be required.

For all other situations, including those involving third-party guests, travel and accommodation must be submitted in advance for approval by the Compliance Department.

## **11. COMMUNICATION AND REPORT CHANNELS**

To address any questions related to this policy, or to other interactions with public or private sector agents not expressly covered herein, please contact the Compliance Department of the Carmelo Fior Companies. You may also request guidance from your immediate supervisors or use the Carmelo Fior Companies' Ethics and Reporting Channel to help prevent potential non-compliance.

If you become aware of conduct that appears improper—or even if you only suspect that something may be wrong—you should refer to the Code of Ethics and Conduct and other applicable policies of the Carmelo Fior Companies.

The channels available for reporting, submitting concerns, and providing information are as follows, with full assurance of confidentiality:

- Direct contact with the immediate supervisor
- Organizational Development Department
- Human Resources Department
- Ethics and Compliance Reporting Channel

The Carmelo Fior Companies will ensure the confidentiality and secrecy of reports and the identity of reporting parties, with the possibility of anonymity. Clients and the general public may also submit reports through the Ethics and Compliance Reporting Channel, with full confidentiality of all information ensured.

Decisions issued by the Carmelo Fior Companies in connection with violations of this Code may be subject to a written request for reconsideration, submitted by the interested party to the Organizational Development Department. The request will be evaluated in coordination with the Board of Directors, which shall issue a final decision on the matter.

**Employees, visitors, and service providers: if you experience or witness any instance of racism, moral harassment, or sexual harassment within our company, please report it immediately through the Ethics and Compliance Reporting Channel.**

**The Carmelo Fior Companies do not tolerate any form of retaliation against individuals who, in good faith, report or raise concerns about potential violations of internal policies, principles, or values.**

Visit our website: [www.carmelofior.com.br](http://www.carmelofior.com.br)

Ethics and Compliance Reporting Channel: <https://www.carmelofior.com.br/ouvidoria>