

# GIFTS AND HOSPITALITY POLICY

***Grendene***<sup>®</sup>



# **GRENDENE S.A.**

**Public Held Company**

**CNPJ n. 89.850.341/0001-60 - NIRE n. 23300021118-CE**

## **GIFTS AND HOSPITALITY POLICY**

### **1. Objective**

1.1. This Policy on Gifts, Presents, and Hospitalities ("Policy") aims to establish the guidelines of Grendene S.A. ("Grendene" or "Company") regarding the giving, offering, promising, and receipt of gifts, presents, and hospitality by its employees to strengthen the Company's internal integrity mechanisms.

1.2. The Company emphasizes that specific concerns about employees receiving gifts, presents, or hospitality are linked in some way to a potential commercial transaction and/or business approval, if applicable. In this sense, even if the giver has no intention of corrupting, the beneficiary may see the offer of a certain gift, present, or hospitality as an attempt to obtain unfair advantages, which is what this Policy aims to prevent.

1.3. This Policy establishes guidelines for the observance of best practices regarding gifts, presents, and hospitality, without prejudice to the desire to cultivate good relations with business partners and other interested parties through legitimate and occasional social interactions. This Policy should be read and interpreted in conjunction with the Code of Ethics and Conduct of the Company.

### **2. Scope**

2.1. This Policy applies to Grendene, as well as its administrators, members of administrative bodies (statutory or not), employees, trainees, and apprentices, regardless of hierarchical level and function exercised, as well as suppliers, service providers, and any third parties involved in business, commercial, and/or financial transactions with Grendene, as applicable, in Brazil and abroad.

2.2. For purposes of clarity, the term "Grendene" or "Company" as used in this Policy shall refer to Grendene S.A. and its affiliated and/or controlled companies, as applicable, in Brazil and internationally.



### 3. General Guidelines

3.1. The offering or receiving of gifts, presents, and hospitality must comply with the applicable legislation (national and international) and respect the policies and procedures of the parties involved, including, but not limited to, Grendene's Code of Conduct, the Third Party Contracting Policy, the Anti-fraud and Corruption Policy, and other integrity rules of the company, as well as any other rules that prohibit the practice of acts aimed at obtaining corporate, financial, and/or commercial advantages, as applicable.

3.2. The promise, receipt, or offer of gifts, presents, and hospitality must be made with the intention of strengthening the commercial relations, according to the local culture, and without any expectation of obligation or commercial and/or financial favor in return, being certain that the promise, offer, and/or acceptance for more than two times in a period of six months will be considered a regular practice for the purposes of this Policy, and, should this occur, it must be immediately communicated to the Grendene Ethics Committee or the Governance, Risks, and Compliance (GRC) department.

3.3. It is a violation of this Policy to offer, promise, or accept gifts, presents, or hospitality that, regardless of their monetary value, can be categorized as an undue advantage (in accordance with the Anti-fraud and Corruption Policy) or that improperly influence Grendene's commercial, financial, and/or business decisions.

3.4. Any eventual gifts, hospitality, or presents granted or received must be done openly and transparently (not in secret), so as not cause embarrassment for the Company or its employees in the event of public exposure, being certain that any case of embarrassment in relation to the offering and/or receiving of gifts, hospitality, or presents involving the Company and/or its collaborators must be immediately reported to the Grendene Ethics Committee or the Governance, Risks, and Compliance (GRC) department.

3.5. Hospitality (including events, training sessions, and meals) may be offered or accepted under the following conditions: a) they are strictly professional in nature; b) they are in accordance with the local tradition and business culture of the country; c) they are offered or accepted without any expectation of reciprocity, exchange of favors, or receipt of cash.

3.6. The employee must promptly refuse or return any gifts, presents, or hospitality that are against this Policy. Consult the Grendene Ethics Committee or the Governance, Risks, and Compliance (GRC) department if you have any questions.



#### 4. Restrictions and Limitations

4.1. As provided in Grendene's Code of Conduct: *"Grendene's employees and their families shall not give, request, or accept gifts or favors from customers, suppliers, service providers, or competitors whose value exceeds US\$ 100.00 (one hundred US dollars). Exceptions must be reviewed and approved by the Board of Directors or the Ethics Committee of Grendene"*.

4.2. It is prohibited to provide, offer, or promise gifts, presents, or hospitality to a Public Agent or their family members.

4.3. Even within the parameters of this Policy, employees or individuals may not regularly offer or accept gifts, presents, or hospitality (more than twice in a six-month period with the same business partner).

4.4. No cash or cash-equivalent gifts (such as gift certificates or vouchers) are permitted to be received or distributed.

4.5. The cost of hospitality cannot be extended to family members or individuals unrelated to the business's purpose.

#### 5. Final Provisions

5.1. In the event of noncompliance with this Policy or other internal rules of the company, Grendene provides an independent Ethics Channel, managed by an outsourced and specialized company that guarantees the confidentiality of the information in accordance with the Whistleblower and Consequences Management Policy.

5.2. Any act of illegality in the conduct of business at Grendene, by both employees and Third Parties, will be subject to the sanctions and penalties stipulated by the applicable laws and external regulations.

5.3. This policy takes effect on the date it is approved by the Board of Directors and must be followed immediately by Grendene, its officers, directors, advisors, advisory committee members, employees, third parties, and other Interested Parties.

Farroupilha, RS, May 11, 2023.

**Renato Ochman**  
Secretary

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