

# SPONSORSHIPS AND DONATIONS POLICY

***Grendene***<sup>®</sup>

**[B]**<sup>3</sup> BRASIL  
BOLSA  
BALCÃO



## GRENDENE S.A.

Publicly Held Company

CNPJ (National Registry of Legal Entities) No.: 89.850.341/0001-60 – NIRE (Company Registration Identification Number) No.: 23300021118-CE

# Sponsorship and Donations Policy

## 1. OBJECTIVES

1.1. The purpose of this Sponsorships and Donations Policy ("Policy") is to establish guidelines and regulations for Grendene S.A.'s sponsorships and donations. ("Grendene" or "Company"), with the intention of fortifying the internal integrity mechanisms of the Company.

## 2. Scope

2.1. This Policy applies to Grendene, its administrators, employees, trainees, apprentices, regardless of hierarchical level or function performed, public agents, suppliers, partners, customers, distributors, and any public or private entity involved in sponsorships or donations to Grendene, both in Brazil and abroad.

2.2. For the sake of clarity, the term "Grendene" in this Policy refers to all controlled companies, whether in Brazil and abroad.

## 3. Reference documents

- Grendene's Code of Conduct ("Code of Conduct")
- Law No. 12,846, of August 1, 2013 ("Anti-Corruption Law") and Decree No.11,129/2022.
- Grendene's Gifts and Hospitality Policy.
- Grendene's Anti-Fraud and Corruption Policy ("Anti-Fraud and Corruption Policy").
- Grendene's Whistleblower and Consequences Management Policy; and
- Grendene's Related Party Transactions Policy ("Related Party Transactions Policy").

## 4. Key Concepts and Definitions

4.1. Donation: transfer of goods (financial or not) from the Company to a third party, without provision of benefits or counterparts to the donor.

4.2. Sponsorship: transfer of assets (financial or otherwise) from the Company to a third party with an agreement to provide benefits or counterparts to the donor.



## 5. General Guidelines

5.1. Sponsorships and Donations made by Grendene will be aimed at projects that encourage socio-environmental, professional, economic, technological, cultural, sporting, educational development, and/or donations to philanthropic organizations in the regions where the company operates, as well as initiatives that can strengthen its name and/or brands.

5.2. Sponsorships and Donations must be in full agreement with Grendene's purpose, values, and strategic pillars and can be made through the transfer of goods, financial or otherwise, to third parties. In donations, there is no exchange or expectation of a counterpart.

5.3. Grendene's entire Sponsorships and Donations process must strictly comply with the applicable regulations and legislations and be in conformity with Grendene's Code of Conduct and other internal regulations.

5.4. Any and all Sponsorships and Donations granted by the Company must be duly formalized, with the appropriate legal instruments and necessary documentation received and filed, assuring transparency, integrity, and legality throughout the process. Donations in cash (financial) must be made via bank deposit in the donor's favor.

5.5. All expenses incurred during this procedure, whether or not tax incentives are involved, must be properly launched, and accounted for in compliance with accounting standards and legal regulations.

5.6. To preserve the integrity of the Sponsorships and Donations process, selected initiatives must go through prior investigation and other measures to prevent corruption and any conflicts of interest.

5.7. This Policy does not apply to gifts given to customers and business partners, as well as awards and gifts awarded to Grendene employees. For more information, check out the Gifts and Hospitality Policy.

## 6. Refusal of Sponsorships and Donations

Donations and sponsorships for the following actions, initiatives, or institutions (or their partners or leaders) are strictly prohibited:


6.1. Affiliated with political parties, campaigns, legislators, public officials, or any form of personal endorsement by a governmental authority.

6.2. With a history of corruption, money laundering, fraud, terrorism financing, or any other situation that violates the Anti-Fraud and Corruption Policy.

6.3. With a history of personal or social discrimination, violation of human rights, or any other circumstance that violates the Code of Conduct.


6.4. That present any type of conflict of interest between the parties involved, as per the Related Party Transactions Policy.

6.5. In the face of adverse publicity through diverse forms of communication and the media.

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- 6.6. That is considered offensive and/or vulgar.
  - 6.7. That is contrary to legal and/or constitutional provisions.
  - 6.8. That encourage any form of violence.
  - 6.9. That is a debtor to the Company.
  - 6.10. That involve gambling and/or speculative activities.
  - 6.11. That violate or is inconsistent with any of the company's internal policies, articles of incorporation, or shareholder agreements.
  - 6.12. That undermine or threaten the preservation of the environment; and/or
  - 6.13. Donations to profit-making entities or individuals.

## **7. Process and Responsibilities**

- 7.1. Entity Registration: To register with Grendene, any entities wishing to receive Sponsorships or Donations must formally request them and submit the necessary papers.
- 7.2. The responsible department will verify the integrity and reputation of the organization and its partners/leaders, projects, etc. through due diligence following the proper submission and receipt of the registration documents. If deemed necessary, it may also conduct independent research to supplement the investigation.
- 7.3. A positive and unconditional result of due diligence does not ensure sponsorship or donation, given that the selection process is at the company's discretion and pertains to the entity that is most consistent with its values, mission, and strategic pillars.
- 7.4. Any Sponsorships or Donations must have the approval of at least one director or officer of Grendene, and the results of the Company's analysis must be filed for any future consultation.
- 7.5. Sponsorships and Donations, if approved, must be formalized through a specific contract or term that includes a clause emphasizing the parties' anti-corruption obligations and the need for accountability, as well as a provision stating that failure to comply with these obligations will result in the unilateral disruption of the instrument.
- 7.6. Monitoring: The Department in charge of Sponsorships or Donations must ensure that the resources were meant for the purpose for which they were designated. In circumstances where you have discovered areas of concern, the department in charge of Sponsorships or Donations should additionally request the Internal Audit area to audit the procedures performed.
- 7.7. Monitoring and Accountability: The entity receiving the sponsorship or donation must be accountable to Grendene by delivering the paperwork agreed upon in item 7.5 above (ideally including image registration).
- 7.8. Tax Incentive: Sponsorships and Donations may include initiatives or programs that have been approved by federal, state, district, or municipal government bodies under the Incentive Act.



7.9. Records: Complete and auditable written and documentary records of all acts related to the granting of donations and sponsorships must be maintained, with special attention to documentation demonstrating that the resources were allocated to the intended purpose.

7.10. The Company's internal procedures will establish the specifics, as well as any other regulations, duties, or documents that may be required.

## **8. Sanctions**

8.1. If a Contributor or third party violates this Policy or other company rules, Grendene provides an independent Ethics Channel, which is managed by a third party, a specialized company, and ensures the anonymity of the information provided.

8.2. The complaints will be investigated in a professional, prompt, unbiased, independent, and confidential way in accordance with Grendene's Whistleblower and Consequences Management Policy.

8.3. Engaging in any illicit activity pertaining to Sponsorships and Donations at Grendene will be subject to the imposition of the penalties and sanctions specified by laws and other external regulations for both employees and third parties involved.

## **9. General Provisions**

9.1. Any omissions in this Policy, as well as any interpretational questions, will be resolved in a Board of Directors meeting.

9.2. This Policy shall go into effect on the date it is approved by the Board of Directors and shall be followed immediately by Grendene, its directors, counselors, members of advisory committees, employees in general, and other interested parties.

Farroupilha, RS, February 29th, 2024.

**Renato Ochman**  
Secretary

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