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## FCC S.A COMMERCIAL POLICY

### 1- OBJECTIVES

The objective of this Commercial Policy of Fábrica Carioca de Catalisadores S.A is to guide its Workforce (own employees/third parties, Managers and Directors) and its commercial representatives and other third parties through guidelines and procedures on the behavior of the company's professionals in their relationship with external entities.

### 2- TARGET PUBLIC

It is the duty of Directors, Managers, employees, third parties and/or any natural or legal person hired (including, here, expressly, their Commercial Representatives) who act, on behalf of Fábrica Carioca de Catalisadores S.A., to respect the criteria provided for in this Policy.


### 3- NECESSARY CONDITIONS

Have made available, electronically, the Standard “**Guidelines for Setting Limits of Competence (revised and updated)**”.

### 4- GENERAL CONDITIONS

As mentioned in the FCC S.A. Code of Conduct, the company's workforce, partners and commercial representatives must offer quality products and services aimed at the full satisfaction of their customers and consumers, to maintain lasting relationships with transparent and permanent dialogue , as well as basing its business decisions on ethics, transparency, integrity, loyalty, legality and efficiency, responsibly using its economic and financial resources in the search for increasing levels of competitiveness, excellence and profitability, considering the legitimate interests of all its stakeholders relationship and its

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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commitment to sustainability.


#### **4.1. Direct relationship with customers or through representatives**

FCC S.A, in all its relationships, including those with customers through commercial representatives and other third parties, is guided by the following principles:

- Transparency in the disclosure of information and characteristics of products and services;
- Adequacy of the product or service to customer demand, aiming to better meet their needs;
- Compliance with laws in the countries where FCC S.A operates;
- Respect and honor commitments made and compliance with Brazilian and international Anti-Corruption legislation, as established in the company's Code of Conduct and Anti-Corruption and Conflict of Interest Policy.
- Integrity, in line with honesty and probity in carrying out the commitments assumed, with coherence between speech and practice, repudiating all forms of fraud and corruption, with an active stance in the face of situations that are not in accordance with the ethical principles assumed.
- Sustainability through due action with environmental, economic and social responsibility, in a balanced way, respecting the right to a full life of current generations and contributing to the preservation of future ones;
- Human dignity and respect for people, among others.

It is not permitted to offer prizes for brand loyalty, facilitation payments, entertainment and gifts (except advertising gifts with the FCC S.A. logo, limited to a maximum of US\$100.00 (one hundred dollars) for other personal benefits with the aim of obtain favors with a frequency that characterizes a personal favor or advantage, as provided for in the aforementioned policies and in others.

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Rebates or commercial discounts and other associated services may be offered to companies within commercial conditions appropriate to the markets if they are approved by the Board.

FCC S.A allows the offering of entertainment to customers (shows, tours, cinema, theaters and the like), if they are demonstrably related to institutional events promoted by the company and/or the organization's projects, programs, or businesses, if they do not characterize individual favoritism. to a specific customer or to a specific employee or third party.


Sponsorship of customer expenses related to transportation, entertainment and accommodation is permitted within the commercial relationship, and must be fully in accordance with the FCC S.A. Travel Policy, being appropriate and reasonable to the culture of each country in which the company operates, as long as approved by the Ethics Committee.

The employee, Manager, Director or collaborator is prohibited from receiving gifts, payments, loans, or any other personal advantage, in their name and/or that of people in their family, as provided for in the Code of Conduct, the Anti-Corruption Policy and in the FCC S.A. Conflict of Interest Policy, except promotional gifts that contain company identification, with a maximum limit of US\$100 (one hundred dollars).

As referred to in the FCC S.A. Code of Conduct (with special emphasis on the Hospitality and Gifts section), all gifts that are not considered promotional gifts - or that do not contain the logo of the company offering the gift - must be submitted to approval by the Ethics Committee, regardless of the value. This committee may approve the acceptance of the gift by the receiving employee or send it to a draw for everyone or a specific group of employees, with a gift that constitutes personal favoritism to a single individual.

Commercial representatives acting on behalf of FCC A., in the country or abroad, must strictly comply with all the guidelines listed in this document, and must certify, through Annex I and other declarations, if necessary, the knowledge and compliance with the FCC S.A. Code of Ethics, as well as the Anti-Corruption and Conflict of Interest Policies, being trained in the contents of these documents in their native languages with training records archived by FCC S.A.

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The FCC S.A. workforce is permitted to receive, accept, and sponsor actions of a sociocultural and/or ethical nature, promoted by its actual and potential clients or by FCC S.A. (its own company), as long as it is evaluated by the **Social Responsibility Committee** and approved by the Ethics Committee.

FCC S.A. is permitted to receive invitations, participate in and/or sponsor seminars of a technical nature, promoted by its suppliers, actual and potential customers or by FCC S.A. (the company itself), if it is approved by the Ethics Committee.

FCC S.A. will make payments of any nature to third parties only through deposits into a current account identified in the name of the third party responsible for providing the service and in the country where the service was provided and will require the due receipt or proof of payment. Any exceptions must be approved by the Ethics Committee.

FCC S.A. Employees may offer corporate gifts for commercial courtesy purposes to their respective points of contact, including advertising gifts with the FCC S.A. logo, limited to a maximum of US\$100 (one hundred dollars) or previously approved by the Ethics Committee of FCC S.A. These must follow the standards established by the FCC S.A Code of Conduct, the Conflict of Interest Policy, the Anti-Corruption Policy and other documents.

#### **4.2 – Corporate card**


Employees holding a corporate card and the respective limits available in reais (R\$) for each employee will be established by the Board of Directors.

Corporate card expenses will be approved by a Director and the Manager of the area involved and must follow the company's travel and expense standards/procedures, established by the FCC S.A. Business Travel Policy.

### **5. Appropriate due diligence**

In order to comply with the Brazilian Anti-Corruption Law (Law 12846/2013) which values objective liability (regardless of guilt or intent) for corrupt, fraudulent or other illicit acts carried out by its workforce or by its commercial representatives and others third parties, acts

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combated by the aforementioned law and in line with the Anti-Corruption Policy, the Code of Conduct and the Conflict of Interest Policy of FCC S.A., the company may, at any time, carry out searches regarding criminal, civil and of other natures of its commercial representatives, partners and its workforce, aiming to reduce their reputation, image and other risks, with express and unequivocal authorization and consent on the part of these third parties and the workforce, in accordance with the articles 7th, I and 5th, XII of the Brazilian General Data Protection Law, preserving the privacy of your personal data.

If it becomes known, through due diligence (due and appropriate diligence) and/or through internal investigations resulting from anonymous complaints or other sources, of the occurrence of an act or practice that brings Fábrica Carioca de Catalisadores into disrepute in its relations or commercial transactions and that are in non-compliance with internal and external national and international laws and the guiding principles and guidelines present in the company's Code of Conduct, Related Party Transactions, Conflict of Interest, Anti-Corruption and other Policies, the company may make use of sanctions and disciplinary measures, in addition to unilateral termination of the contract signed with its commercial representatives and/or other third parties, without prejudice to legal actions, when necessary.

## 6. Policy changes

Any change to this Policy must be approved by the Ethics Committee of Fábrica Carioca de Catalisadores S.A. and communicated to interested parties.

Changes in internal procedures that directly affect the practices established in this policy must be communicated, with mandatory revisions to related documents (FCC S.A. Code of Conduct, Anti-Corruption Policy, Travel Policy, Conflict of Interest Policy and others).


## 7. Deadlines

This policy has an indefinite validity period and must be reviewed as provided above.

## 8. Related Documents

FCC S.A. Code of Conduct  
Conflict of Interest Policy

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Travel Policy

Anti-Corruption Policy

Standard Guidelines for Setting Limits of Competence

Third Party Contracting Policy (PCT)

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### **Annex I- AGREEMENT AND DECLARATION OF ADHERENCE TO THIS POLICY**

I declare to have read and understood this document, on this date, committing to fully adopt it during the execution of my duties, in all its terms, conditions and ethical principles, as well as to maintain the confidentiality of any and all information received in the development of my activities, including after the termination of my contractual or employment relationship with FCC S.A.

I hereby expressly authorize and in accordance with the Brazilian General Data Protection Law (LGPD - Law 13709/2018) FCC S.A to research my criminal, civil, labor and other records at any time and terminate the contract signed with the company, use sanctions and disciplinary measures, without prejudice to legal means, if necessary, if it is proven that such antecedents discredit FCC S.A. and its reputation and/or are in disagreement with the Policies and other documents referred to above in item 8 of this Commercial Policy.

Name:

Employee

Registration:

Collaborator

CPF

CNPJ/ MF

Commercial Representant

C PF

CNPJ/MF

Date:

Signature:

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