



Manual For Suppliers - Machines

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GLOSSARY

SUPPLIER CLASSIFICATION

Suppliers of items/services applied to Romi products: Manufacturers of Mechanical, Electrical, Electronic, Hydraulic and Pneumatic Items; Suppliers of Machining, Deburring, Painting and Surface Treatment Services; among others.

Suppliers whose items or services are not applied to Romi products, such as suppliers of Office Supplies, Auxiliary Materials, Construction Materials, PPE, Direct Debits, among others, are not evaluated.

Calibration service suppliers: Providers of instrument calibration services.

Transportation service suppliers: Providers of transportation services for machines and components.

Note: Supplier classification depends on the analysis performed by ROMI.

TERMS USED IN THIS MANUAL

PRODUCT: Applies to an item/service; **ROMI S/A:** Hereinafter referred to as Romi;

PPM: Parts Per Million: An indicator that shows the rejection rate of supplied products, calculated by dividing the number of rejected parts by the total number of parts supplied and multiplying the result by one million.

IP: On-Time Delivery Index: An indicator that shows the percentage of on-time deliveries made by the supplier in relation to the total number of deliveries made.

INTRODUCTION

This Manual was developed by Romi to guide all its suppliers regarding the minimum requirements necessary for the supply of items and/or services.

As an important communication channel between Romi and its Suppliers, this Manual shall be used as a guidance document for meeting the requirements by all companies that wish to become, or are already, part of Romi's group of approved suppliers.

This Manual describes the supplier evaluation/re-evaluation system and the methods used to monitor each supplier's performance.

Romi's main quality objective is to ensure the success of its customers and reduce environmental impacts. Therefore, we expect our suppliers to continuously pursue improvement in order to meet and exceed the expectations and requirements of this Manual.

PURPOSE

The main purpose of this Manual is to define and regulate the requirements for supplying products to Romi. To meet Romi's requirements, suppliers shall:

- a) Implement appropriate systems and controls that ensure the timely supply of conforming, defect-free products;
- b) Manage their facilities, processes, management systems and personnel so that they can consistently, and at fair costs, manufacture products and provide services that meet the needs of Romi and its customers;
- c) Develop and implement a Quality Management System based on the standard established by Romi and documented in the sections of this Manual;
- d) Comply with applicable legal requirements;
- e) Use appropriate statistical techniques for process control and continuous improvement;
- f) Continuously improve processes by reducing variation and eliminating all waste.

CONFIDENTIALITY

All matters discussed with suppliers shall be considered confidential. Under no circumstances may matters discussed between Romi and the Supplier be disclosed to third parties without Romi's prior authorization. The Supplier confirms this commitment upon receipt of this Manual, except when a Romi Customer requires the Supplier to enter into a specific confidentiality agreement. Failure to comply with this requirement may result in penalties and/or legal sanctions.

GENERAL SUPPLY CONDITIONS

In addition to meeting the requirements of this Manual, suppliers shall comply with all clauses of the General Supply Conditions, a document available on Romi's website (<http://www.romi.com/>).

1. SUPPLIER EVALUATION - QUALITY

The Evaluation procedure was created to verify whether suppliers are capable of meeting the requirements specified by Romi.

A supplier may be approved through certification analysis (ISO 9001 / IATF 16949 / ISO 17025), and/or the company will be subjected to an evaluation process as follows:

- Audits at the company's facilities performed by Romi using evaluation forms, and/or a request for evidence demonstrating compliance with the minimum requirements necessary to become a Romi supplier; or
 - Self-Assessment, in which the supplier is responsible for completing and submitting the form.
- The methods mentioned above depend on the supplier classification, as defined in the Glossary, and on the criteria defined in item 1.2.

The main requirements established by Romi for suppliers are those described in ISO 9001, particularly:

- Process Control and Monitoring (process management through indicators);
- Provision of Human and Material Resources;
- Critical Review Process for Supply;
- Supplier Control;
- Product Identification and Preservation;
- Controls and Resources Focused on Product/Service Realization;
- Product/Service Release Process;
- Nonconformity and Corrective Action;
- Competence Management.

Romi reserves the right to freely evaluate, select and qualify its suppliers in accordance with the forms and criteria listed in the following items.

The forms used will be available to suppliers for consultation upon request.

1.1. FORMS

The forms used in the evaluation process are:

Form	Purpose	Application
FAFG - Supplier Evaluation Form (General)	Supplier Evaluation, Self-Assessment and Self-Re-evaluation	Manufacturers, Service Providers and Distributors
FAAF - Supplier Evaluation Audit Form	Supplier Evaluation	Manufacturers, Service Providers and Distributors
FAPFM - Supplier Process Audit Form - Machine	Supplier Evaluation	Manufacturers, Service Providers and Distributors
FAFST - Transportation Service Supplier Evaluation Form	Self-Assessment, Evaluation and Re-evaluation of Transportation Suppliers	Transportation Suppliers
FAFSC - Calibration Service Supplier Evaluation Form	Self-Assessment, Evaluation and Re-evaluation of Calibration Suppliers	Calibration Suppliers

1.2. INITIAL SUPPLIER EVALUATION CRITERIA

Suppliers will be evaluated according to the application of the items/services supplied, taking into account the criteria and documentation defined in the table below:

Application	Critical to Quality	Evaluation Criteria	Documentation
Suppliers of items or services applied to Romi products	Yes	Evaluation or Self-Assessment	FAFG + ISO 9001 or IATF 16949 Certificate or FAFG (self-assessment) or FAFG + FAAF (evaluation)
Calibration service suppliers	Yes	Self-Assessment	ISO 17025 Certificate + FAFSC cover page or FAFSC
Transportation service suppliers	No	Self-Assessment	ISO 9001 Certificate and/or FAFST + AEO Certificate or RMP

Notes:

- The evaluation of suppliers of items/services specified by the customer shall follow the supplier evaluation criteria mentioned above; however, completion of item 2.0 of the FAF is not required;
- The expiration dates of ISO 9001, IATF 16949 and ISO 17025 certificates and evaluation forms will be monitored. If a document expires, the target deadline for updating it will be one month, or the supplier shall submit a recommendation letter from the certification body until the new certificate is issued;
- If the manufacturer of an item to be marketed by the distributor is ISO 9001 certified, with a certification scope compatible with Romi's interests, a copy of the certificate shall be requested and its validity shall be monitored;
- Suppliers providing road transportation of export and import goods should preferably hold an Authorized Economic Operator (AEO) certificate. Otherwise, they shall have a Risk Management Plan (RMP), which shall primarily include the route, monitoring and stopping scope, and the expiration date of this document shall be controlled. In this case, even if the carrier holds ISO 9001 certification, completion of the evaluation form is mandatory for the applicable questions identified by Romi.
- Suppliers of seals used in export packaging shall comply with ISO 17712 requirements, including ISO 9001 certification and seal testing.
- During Purchased Item Development, when an item is highly critical, a process audit, validations or test reports requested in the Purchased Item Development process shall be performed for machined items, sheet-metal parts, castings and raw materials, in the phases 'Recommend Tests,' 'Perform Tests' and 'Analyze Report and Define Action Plan,' effective March 2022.

1.2.1. CALIBRATION SERVICE SUPPLIERS

Suppliers of Instrument Calibration and Testing Services that are ISO 17025 certified may be exempt from evaluation, provided that they are registered on the INMETRO website to demonstrate that the laboratory is accredited by the Brazilian Calibration Network (RBC) and that its scope meets ROMI's needs. The Brazilian Calibration Network - RBC website shall be accessed at www.inmetro.gov.br/laboratorios/rbc.

Suppliers that are not ISO 17025 certified will be subjected to the evaluation process.

Suppliers subject to self-assessment that continue to provide calibration services to Romi shall be re-evaluated every three years.

The re-evaluation shall be performed by the department responsible for the instrument, which shall be consulted before the instrument is sent to the supplier.

1.2.2. EXTERNAL TRANSPORTATION SERVICE SUPPLIERS

Transportation suppliers shall be selected and evaluated according to the table below:

Transportation Supplier	Documents	Frequency
Export Market (AEO)	AEO Certificate and Export Transportation Supplier Audit	Annually
Domestic Market	ISO 9001 Certificate	Document validity period
	Transportation Supplier Self-Assessment	3 years

Suppliers providing road transportation of export and import goods should preferably hold an Authorized Economic Operator (AEO) certificate. Otherwise, they shall have a Risk Management Plan (RMP), which shall primarily include the route, monitoring and stopping scope.

ROMI will perform annual periodic monitoring by checking the AEO certification of its service providers on the Brazilian Federal Revenue Service website and/or through the evaluation form. On-site visits may occur depending on the evaluation performed, ROMI's needs and the role of each provider in the logistics chain.

The certification check performed on the Brazilian Federal Revenue Service website shall be stored in the corporate 'Supplier Management' system.

The export-market transportation supplier shall refuel its vehicles before collection at ROMI.

The supplier will be evaluated through completion of the FAFST and FAFST-ME forms, and the approved or rejected status will be recorded by the department responsible for the service.

All other documents shall be controlled by their expiration date. When no expiration date is specified, they shall be reviewed annually with the suppliers.

When evaluations using self-assessment forms are applicable, the re-evaluation frequency will be three years.

When freight is paid to a non-approved carrier, the Tax Accounting Department shall, during freight verification, determine with the responsible Department/Area why the charge was incurred. If it is a one-time occurrence related to the shipment or collection of materials for customers/suppliers, such as shipments/returns, returns of goods, sales, purchases, etc., the process shall proceed normally. Otherwise, after processing, the Purchasing Technical Support Department shall be contacted to assess the feasibility of approving the carrier.

1.2.2.1. BREACH OF CARGO UNIT (CONTAINER) INTEGRITY, TAMPERING WITH OR BREAKAGE OF SEALS ON EXPORT-MARKET PACKAGING

Whenever a breach of cargo-unit integrity, tampering or breakage is identified between the seals listed in the export documents and the seals found on the goods, the service provider shall, immediately after the occurrence, access ROMI's website at <https://www.romi.com/fale-conosco/> and report the occurrence through the link provided on that page, 'For matters related to breaches of the international logistics chain.'

In addition, SCOMEX (Foreign Trade Department) shall be notified immediately and will take the appropriate action. Regardless of the condition of the packaging, a ROMI shipping employee, or a person authorized by the company through a power of attorney, will go to the location of the goods to inspect the cargo and apply a new seal. If the packaging has minor damage, the shipping employee will bring the material required to properly close it at the shipping location. Otherwise, the goods shall be returned to ROMI so that the packaging process can be repeated. In all cases, SCOMEX shall update all documentation to include the new seal(s).

1.3. FINANCIAL EVALUATION

Suppliers will be evaluated by consulting a credit protection service (e.g., SERASA). If there are outstanding financial issues, Romi will assess whether they could significantly affect supply and may reject the supplier during the supplier selection process.

1.4. OVERALL RESULT OF SUPPLIER SELF-ASSESSMENT / AUDIT

The Self-Assessment or Evaluation forms are divided into Requirement groups based on standards defined by Romi. After the forms have been applied to suppliers, the evaluation result shall be analyzed, and the appropriate actions shall be taken, according to the table below:

Score of the Requirement	Level of Compliance with the Requirement	Classification of the Requirement	Action with Supplier
80 to 100%	Requirement met	Green	Submit evidence supporting the score and monitor performance in accordance with requirement 3.4
50 to 79.99%	Requirement partially met	Yellow	Establish an action plan or monitor supplier performance in accordance with requirement 3.4

0 to 49.99%	Requirement not met	Red	After approval by the Purchasing Coordinator or Manager, establish an action plan if there is interest in continuing the development.
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The supplier shall carry out the actions defined in the table above according to a schedule agreed with Romi.

Romi reserves, for itself, purchasers of machines manufactured by Romi, or its customers, the right to monitor the manufacture of items or performance of services ordered by Romi through audits.

1.5. MEASUREMENT AND MONITORING OF SUPPLIER PERFORMANCE

The indicators will be calculated periodically and used to continuously monitor each supplier's performance. The indicators will make it possible to identify failures and improvement opportunities, with the objective of continuously improving delivery quality. Unsatisfactory performance against these indicators may result in supplier disqualification.

Any supplier with unsatisfactory delivery performance may be excluded from new development projects and placed under re-evaluation or disqualification.

Suppliers that present nonconformities may be required to bear the costs of poor quality incurred by Romi. The criteria used to recover these costs are detailed in the General Supply Conditions, available on Romi's website ([Want to Become a Romi Supplier? | ROMI S.A.](#)).

The indicators used to monitor supplier performance are listed in the following items (1.5.1, 1.5.2 and 1.5.3).

1.5.1. QUALITY: PPM INDEX

Quality performance will be measured and monitored only for suppliers whose items or services are applied to Romi products. The calculation formula is as follows:

$$\text{PPM} = (\text{NO. OF NONCONFORMING PARTS} / \text{NO. OF PARTS SUPPLIED}) \times 1,000,000$$

1.5.2. ON-TIME DELIVERY: ON-TIME DELIVERY INDEX

The index will be measured as the percentage of on-time deliveries made by the supplier in relation to the total number of deliveries. The permitted tolerances for early and late deliveries are defined annually by Romi, and the criterion used to compare dates varies according to the market, as follows:

Domestic Market: The promised delivery date stated in the Purchase Order is compared with the actual delivery date, as evidenced by the gate stamp on the corresponding invoice.

Export Market: The requested shipment date stated in the Purchase Order is compared with the supplier's invoice date.

$$\text{IP} = (\text{TOTAL ON-TIME DELIVERIES} / \text{TOTAL DELIVERIES}) \times 100$$

1.5.3. IQF: SUPPLY QUALITY INDEX (QUALITY + ON-TIME DELIVERY)

IQF will be measured and monitored only for suppliers whose items or services are applied to Romi products.

The IQF value is obtained by combining the INC* and IP** scores. The index will be calculated according to the following formula:

$$IQF = (0.6 \times INC) + (0.4 \times IP)$$

The following weights are considered when calculating IQF:

Index	Weight
INC	60,00%
IP	40,00%

* INC = Nonconformity Index: Percentage obtained by converting the PPM value according to the table below:

INC PPM Scale	
1-600PPM	100%
601-1000 PPM	95%
1001-1400 PPM	90%
1401-1800 PPM	85%
1801-2200 PPM	80%
2201-2800 PPM	75%
2801-3200 PPM	70%
3201-4000 PPM	65%
4001-5000 PPM	60%
5001-6200 PPM	55%
Above 6200 PPM	50%

** IP = On-Time Delivery Index: Number of on-time deliveries / Total number of deliveries.

1.5.4. DISCLOSURE OF RESULTS

The criteria and frequency for disclosing results will be defined by Romi and communicated to Suppliers in due course.

1.6. SUPPLIER RE-EVALUATION

Suppliers with **no** quality or on-time delivery issues:

Criterion	Re-evaluation frequency	Action to be taken
Supplier certified to ISO 9001 or IATF 16949	According to the certificate expiration date	Keep the certificate up to date
Supplier not certified to ISO 9001 or IATF 16949	5 years	Perform a supplier audit or request a Self-Assessment

Suppliers with **isolated** quality or on-time delivery issues:

Criterion	Re-evaluation frequency	Action to be taken
Supplier certified to ISO 9001 or IATF 16949	According to the certificate expiration date	Keep the certificate up to date
Supplier not certified to ISO 9001 or IATF 16949	3 years	Perform a supplier audit or request a Self-Assessment

Suppliers with **systemic** quality or on-time delivery issues shall be re-evaluated within one year, according to the table below:

	Level 1	Level 2
Monitoring	PPM / On-Time Delivery	IQF
Frequency	Monthly	Semiannually
Criterion	Below target for 3 consecutive months with an increasing trend	Critical Zone: 0% to 59.99% Improvement Zone: 60% to 79.99% Quality Zone: 80% to 89.99% Excellence Zone: 90% to 100%
Action	Corrective Action Off-site Audit - Process - Product - System - Romi Procedure	Improvement Zone: 60% to 79.99% Corrective Action Off-site Audit (Justification) - Process - Product - System - Romi Procedure Critical Zone: 0% to 59.99% - Recommend development of a new source

An action plan shall be opened to address requirements that may adversely affect product quality.

The effectiveness of implemented actions will be demonstrated through supplier performance. If performance is unsatisfactory, a new supply source shall be evaluated.

The action plan deadline will be defined by the auditor together with the supplier, according to the action to be carried out. If the supplier does not respond to the action plan, development of a new supply source shall be recommended.

Note: When an audit cannot be performed at the supplier's site, Romi will conduct an off-site audit. In this case, the supplier shall submit all evidence requested by Romi, which will be critically evaluated, and the actions shall follow item 1.6.1.

1.6.1. ACTION PLAN MANAGEMENT

For suppliers presenting quality or on-time delivery problems, an action plan will be opened to address requirements that received a score below 10 in the audit performed.

The deadline for completing the action plan will be defined by the auditor together with the supplier, considering the action to be carried out. If the supplier does not respond or does not continue the action plan, development of a new supply source shall be recommended.

The effectiveness of implemented actions will be demonstrated through supplier performance. If performance is unsatisfactory, a new supply source shall be evaluated.

2. SUPPLIER EVALUATION - ENVIRONMENT

2.1. REQUIREMENTS APPLICABLE TO ENVIRONMENTAL SUPPLIERS

Considering the current Environmental Legislation applicable to the supplier's activities, it is essential to provide evidence of compliance with public authorities and other control and inspection agencies, as well as full compliance with current federal, state and municipal legislation.

Therefore, in addition to other documents that may subsequently be requested, the documents listed below shall always be valid and up to date.

- IBAMA Federal Technical Registry;
- Operating License issued by the state environmental control agency; and
- Fire Department Inspection Certificate.

The main requirements of Brazilian federal environmental legislation are listed below so that suppliers can identify those applicable to their company's activities and take the measures necessary to achieve compliance.

Legislation / Standard	Status	Current Table Text	Suggested Text (Updated)	Reason for Change	Updated Legal Reference
Law No. 12,651/2012 - Forest Code	Requires Update	Amended by Provisional Measure 571 2012	Amended by Law No. 12,727 2012, which converted Provisional Measure No. 571/2012, and by subsequent amendments.	Provisional Measure No. 571/2012 should not be cited as a separate amendment currently in force because it was converted into Law No. 12,727/2012. Law No. 12,651/2012 remains in force as the Forest Code.	Law No. 12,727, dated 10/17/2012 - Legislative Branch - in force.
Law No. 6,938/1981 - National Environmental Policy	Requires Update	Amended by Law 12,651 2012	Amended by Law No. 12,651/2012 and Law No. 15,190/2025 - General Environmental Licensing Law, subject to the authorities established by Supplementary Law No. 140/2011.	Law No. 6,938/1981 remains in force; however, environmental licensing is now subject to specific general rules under the General Environmental Licensing Law, effective since February 2026. Supplementary Law No. 140/2011 shall also be considered when defining the authority of the Federal Government, States, Federal District and Municipalities.	Law No. 15,190, dated 08/08/2025 - Legislative Branch - in force; Supplementary Law No. 140, dated 12/08/2011 - Legislative Branch - in force.
Law No. 9,433/1997 - National Water Resources Policy	Updated	No text requires updating.	Not applicable.	Law No. 9,433/1997 remains in force. In practice, it is only recommended to verify whether the water resource falls under federal or state jurisdiction, because the authority to grant water-use rights may rest with ANA or the competent state agency.	Law No. 9,433, dated 01/08/1997 - Legislative Branch - in force.

Law No. 12,305/2010 - National Solid Waste Policy	Requires Update	Regulated by Decree No. 7,404 of December 23, 2010.	Regulated by Decree No. 10,936 of January 12, 2022, which replaced Decree No. 7,404/2010. When applicable, obligations related to the Solid Waste Management Plan (PGRS), reverse logistics, MTR/SINIR and environmentally sound waste disposal shall be observed.	Decree No. 7,404/2010 was revoked and replaced by Decree No. 10,936/2022. In addition, waste-movement control was strengthened by MTR/SINIR, regulated by MMA Ordinance No. 280/2020.	Decree No. 10,936, dated 01/12/2022 - Office of the President - in force; MMA Ordinance No. 280, dated 06/29/2020 - Ministry of the Environment - in force.
Law No. 9,605/1998 - Environmental Crimes	Requires Update	Regulated by Decree No. 3,179 of September 21, 1999, with regard to administrative penalties.	Regulated, with regard to environmental administrative offenses and penalties and the federal administrative process, by Decree No. 6,514 of July 22, 2008.	Decree No. 3,179/1999 was replaced by Decree No. 6,514/2008, currently the federal reference for environmental administrative offenses and penalties.	Decree No. 6,514, dated 07/22/2008 - Office of the President - in force.
Decree No. 96,044/1988 - Road Transportation of Dangerous Goods	Requires Update	Regulated by ANP Resolution No. 420 of February 12, 2004.	Regulated, with regard to supplementary instructions for the road transportation of dangerous goods, by ANTT Resolution No. 5,998 of November 3, 2022, and subsequent amendments.	The reference to 'ANP Resolution No. 420/2004' is incorrect. The competent authority is ANTT, and the currently applicable standard is ANTT Resolution No. 5,998/2022, effective since 06/01/2023, as subsequently amended.	ANTT Resolution No. 5,998, dated 11/03/2022 - National Land Transportation Agency - in force.

Decree No. 99,274/1990	Updated	No text requires updating.	Not applicable.	Decree No. 99,274/1990 remains in force as the regulation of the National Environmental Policy, without prejudice to the supplementary application of the General Environmental Licensing Law to licensing procedures.	Decree No. 99,274, dated 06/06/1990 - Office of the President - in force.
Decree No. 99,280/1990	Updated	No text requires updating.	Not applicable.	Decree No. 99,280/1990 remains valid as the instrument promulgating the Vienna Convention and the Montreal Protocol.	Decree No. 99,280, dated 06/06/1990 - Office of the President - in force.
MINTER Ordinance No. 53/1979 - Waste	Requires Update	Provides for waste disposal and treatment. Prohibits final disposal of waste on the ground.	Provides historical waste guidelines and should be replaced as the primary reference by Law No. 12,305/2010 - National Solid Waste Policy, Decree No. 10,936/2022, and the applicable standards on environmentally sound final disposal, PGRS and MTR/SINIR.	MINTER Ordinance No. 53/1979 is outdated and should not be used as the primary current reference. The current framework for waste management is the National Solid Waste Policy (PNRS), regulated by Decree No. 10,936/2022, in addition to MTR/SINIR obligations when applicable.	Law No. 12,305, dated 08/02/2010 - Legislative Branch - in force; Decree No. 10,936, dated 01/12/2022 - Office of the President - in force; MMA Ordinance No. 280, dated 06/29/2020 - Ministry of the Environment - in force.
MINTER Ordinance No. 100/1980 - Black Smoke	Updated	No text requires updating.	Not applicable.	No express federal revocation requiring direct replacement of this reference was identified. In practice, it is recommended to verify stricter state/local rules and applicable vehicle inspection/maintenance programs.	MINTER Ordinance No. 100, dated 07/14/1980 - Ministry of the Interior - no direct federal replacement identified in the analysis.

ANP Resolution No. 05/2008 - LPG Storage	Requires Update	ANP Resolution 05 2008 Establishes safety conditions for facilities storing portable LPG cylinders.	ANP Resolution No. 51 2016 Establishes requirements for LPG resale activities, including the acquisition, storage, transportation and sale of portable LPG cylinders, as applicable.	ANP Resolution No. 05/2008 was revoked, and the current reference for the resale/storage of portable LPG cylinders is ANP Resolution No. 51/2016.	ANP Resolution No. 51, dated 11/30/2016 - National Agency of Petroleum, Natural Gas and Biofuels - in force.
		Amended by ANP Resolution 54 2011			
ANP Resolution No. 15/2005 - LPG Distribution	Requires Update	ANP Resolution 15 2005	ANP Resolution No. 49 2016 Establishes the requirements necessary for authorization to engage in LPG distribution. Applicable to companies that distribute LPG, not to a company that only consumes LPG.	ANP Resolution No. 15/2005 and previous amendments were replaced by ANP Resolution No. 49/2016. The application also needs to be corrected: authorization to distribute LPG applies to distributors, not to any company that merely uses LPG as a consumer.	ANP Resolution No. 49, dated 11/30/2016 - National Agency of Petroleum, Natural Gas and Biofuels - in force.
		Establishes the requirements necessary for authorization to engage in the distribution of liquefied petroleum gas (LPG) and regulates that activity.			
		Companies that use and distribute LPG.			
		Amended by ANP Resolution 39 2011			
IBAMA Ordinance No. 85/1996	Updated	No text requires updating.	Not applicable.	IBAMA Ordinance No. 85/1996 remains a reference for the Internal Self-Inspection Program for Proper Maintenance of Diesel-Powered Fleets.	IBAMA Ordinance No. 85, dated 10/17/1996 - IBAMA - in force.

CONAMA Resolution No. 237/1997 - Environmental Licensing	Requires Update	Provides for environmental licensing.	Provides for environmental licensing, subject to the general rules of Law No. 15,190/2025 - General Environmental Licensing Law, the allocation of authorities under Supplementary Law No. 140/2011, and the application of CONAMA Resolution No. 237/1997 to the extent that it remains compatible.	CONAMA Resolution No. 237/1997 remains relevant; however, as of 2026, environmental licensing is also governed by a specific general federal law. Certain provisions of the new law are still under judicial review by the Brazilian Federal Supreme Court (STF), and legal validation is recommended in sensitive cases.	Law No. 15,190, dated 08/08/2025 - Legislative Branch - in force; CONAMA Resolution No. 237, dated 12/19/1997 - CONAMA - in force to the extent compatible.
ANTT Resolution No. 420/2004 - Dangerous Goods	Requires Update	ANTT Resolution 420 2004 Approves supplementary instructions to the Regulations for the Road and Rail Transportation of Dangerous Goods. Amended by ANTT Resolution 3,763 2012	ANTT Resolution No. 5,998 2022 Updates the Regulations for the Road Transportation of Dangerous Goods, approves its Supplementary Instructions and establishes other provisions, with subsequent amendments, including ANTT Resolutions No. 6,016/2023 and No. 6,056/2024.	ANTT Resolution No. 420/2004 is no longer the current reference. The currently applicable standard is ANTT Resolution No. 5,998/2022, effective since 06/01/2023.	ANTT Resolution No. 5,998, dated 11/03/2022 - ANTT - in force.
Law No. 10,357 - Controlled Chemicals	Requires Update	Federal Law 10,357 2011	Federal Law 10,357 2001	The law number is correct, but the year is incorrect. Law No. 10,357 is dated	Law No. 10,357, dated 12/27/2001 - Legislative

				12/27/2001, not 2011. It remains in force and is regulated by Decree No. 4,262/2002.	Branch - in force; Decree No. 4,262, dated 06/10/2002 - Office of the President - in force.
MJ Ordinance No. 1,274/2003 - Chemicals Controlled by the Federal Police	Requires Update	MJ Ordinance 1,274 2003 Provides for chemicals controlled by the Federal Police. Amended by MJ Ordinance 113 2004	MJSP Ordinance No. 204 2022 Establishes procedures for the control and inspection of chemicals and defines the chemicals subject to Federal Police control, subject to subsequent amendments, including MJSP Ordinance No. 223/2022.	MJ Ordinance No. 1,274/2003 was superseded by subsequent standards. The current reference is MJSP Ordinance No. 204/2022, published on 10/24/2022 and subsequently amended.	MJSP Ordinance No. 204, dated 10/21/2022 - Ministry of Justice and Public Security - in force, as amended.
CONAMA Resolution No. 313/2002 - National Inventory of Industrial Waste	Requires Update	Provides for the National Inventory of Industrial Waste.	Provides for the National Inventory of Solid Industrial Waste. When applicable, obligations relating to PGRS, MTR/SINIR and traceability of waste movements shall also be observed.	CONAMA Resolution No. 313/2002 remains valid, but the table should be supplemented by the current requirements of the National Solid Waste Policy (PNRS), Decree No. 10,936/2022 and MMA Ordinance No. 280/2020, especially for waste generators, carriers, treatment/disposal facilities and temporary storage facilities.	CONAMA Resolution No. 313, dated 10/29/2002 - CONAMA - in force; Decree No. 10,936, dated 01/12/2022 - Office of the President - in force; MMA Ordinance No. 280, dated 06/29/2020 - Ministry of the Environment - in force.

CONAMA Resolution No. 01/1990 - Noise	Updated	No text requires updating.	Not applicable.	CONAMA Resolution No. 01/1990 remains a reference for noise pollution and shall be applied together with ABNT technical standards and municipal noise regulations, where applicable.	CONAMA Resolution No. 01, dated 03/08/1990 - CONAMA - in force.
CONAMA Resolution No. 08/1990 - Stationary-Source Emissions	Requires Update	Establishes maximum pollutant emission limits for external combustion processes in new stationary sources.	Establishes emission limits for stationary sources. CONAMA Resolution No. 382/2006 shall also be observed for new stationary sources, and CONAMA Resolution No. 436/2011 for existing stationary sources or those whose Installation License application predates 01/02/2007.	CONAMA Resolution No. 08/1990 is outdated and should be supplemented by CONAMA Resolutions No. 382/2006 and No. 436/2011, which are currently the main references for atmospheric emission limits from stationary sources.	CONAMA Resolution No. 382, dated 12/26/2006 - CONAMA - in force; CONAMA Resolution No. 436, dated 12/22/2011 - CONAMA - in force.
CONAMA Resolution No. 382/2006 - Atmospheric Emissions	Requires Update	Establishes maximum atmospheric pollutant emission limits for stationary sources.	Establishes maximum atmospheric pollutant emission limits for stationary sources, supplemented by CONAMA Resolution No. 436/2011 and amended by CONAMA	The reference to CONAMA Resolution No. 382/2006 is correct but incomplete. CONAMA's own consolidated information indicates a relationship with Resolution No. 436/2011 and an amendment by Resolution No. 501/2021.	CONAMA Resolution No. 382, dated 12/26/2006 - CONAMA - in force, supplemented and amended; CONAMA Resolution No. 436, dated 12/22/2011 - CONAMA - in

			Resolution No. 501/2021.		force; CONAMA Resolution No. 501, dated 10/21/2021 - CONAMA - in force.
CONAMA Resolution No. 267/2000 - Ozone-Depleting Substances	Updated	No text requires updating.	Not applicable.	CONAMA Resolution No. 267/2000 remains a reference for substances controlled under the Montreal Protocol, as amended by CONAMA Resolution No. 340/2003, already listed in the table.	CONAMA Resolution No. 267, dated 09/14/2000 - CONAMA - in force; CONAMA Resolution No. 340, dated 09/25/2003 - CONAMA - in force.
CONAMA Resolution No. 357/2005 - Water Bodies and Effluents	Requires Update	Companies that discharge liquid effluents into water bodies or have a septic tank.	Companies that discharge liquid effluents into water bodies, subject to CONAMA Resolution No. 430/2011 and the conditions of the applicable license/water-use permit. Individual systems, such as septic tanks, are subject to the applicable technical, sanitary, municipal and state standards.	CONAMA Resolution No. 430/2011 supplements and amends CONAMA Resolution No. 357/2005 with respect to effluent discharge conditions and standards. The mere existence of a septic tank should not be treated in the same manner as direct discharge into a water body, because specific sanitary, technical, municipal and state standards may apply.	CONAMA Resolution No. 357, dated 03/17/2005 - CONAMA - in force; CONAMA Resolution No. 430, dated 05/13/2011 - CONAMA - in force.
CONAMA Resolution No. 358/2005 - Health-Care Waste	Updated	No text requires updating.	Not applicable.	CONAMA Resolution No. 358/2005 remains valid for the treatment and final disposal of health-care waste and shall be applied together with ANVISA RDC No. 222/2018 for sanitary	CONAMA Resolution No. 358, dated 04/29/2005 - CONAMA - in force.

				management.	
CONAMA Resolution No. 362/2005 - Used or Contaminated Lubricating Oil	Requires Update	Provides for the use, combustion, incineration, formulation and composition, treatment, final disposal, recycling, refining, industrial processing, transportation and sale of lubricating oils.	Provides for the take-back, collection and final disposal of used or contaminated lubricating oil (OLUC), establishing that environmentally sound disposal shall generally occur through re-refining, subject to applicable standards.	The current text does not adequately reflect the summary and main purpose of CONAMA Resolution No. 362/2005, which addresses the take-back, collection and final disposal of used or contaminated lubricating oil.	CONAMA Resolution No. 362, dated 06/23/2005 - CONAMA - in force.
ANVISA RDC Resolution No. 306/2004 - Health-Care Waste	Requires Update	ANVISA Resolution 306 2004	ANVISA RDC Resolution No. 222 2018	ANVISA RDC No. 306/2004 was revoked by ANVISA RDC No. 222/2018, which is the current sanitary reference for health-care waste management.	ANVISA RDC No. 222, dated 03/28/2018 - Brazilian Health Regulatory Agency - in force.
		Provides for the Technical Regulation on health-care waste management.	Regulates Good Practices for Health-Care Waste Management.		
IBAMA Normative Instruction No. 06/2014 - Federal Technical Registry	Requires Update	IBAMA Normative Instruction 06 2014	IBAMA Normative Instruction No. 13 2021	The current reference for registration in the CTF/APP is IBAMA Normative Instruction No. 13/2021, as subsequently amended. IBAMA's own website identifies NI No. 13/2021 and the subsequent update introduced by NI No. 23/2025.	IBAMA Normative Instruction No. 13, dated 08/23/2021 - IBAMA - in force; IBAMA Normative Instruction No. 23, dated 12/23/2025 - IBAMA - in force as a subsequent amendment.
		Defines the individuals and legal entities required to register in the Federal Technical Registry of Potentially Polluting	Regulates the obligation to register in the Federal Technical Registry of Potentially Polluting Activities and Users of		

		Activities or Users of Natural Resources.	Environmental Resources (CTF/APP), applicable to individuals and legal entities that perform activities covered by the standard, subject to subsequent amendments, including IBAMA Normative Instruction No. 23/2025.		
		All individuals and legal entities described in Annexes I and II of the standard.			

2.2. ENVIRONMENTAL SUPPLIER ASSESSMENT AND QUALIFICATION

Suppliers classified as critical are assessed according to the following table:

Management	SUPPLIER	TYPE OF ASSESSMENT/DOCUMENTS
Environment	Outsourced machined parts supplier	• ISO 14001 Certificate (optional); • Operating License; • Fire Department Inspection Certificate.
Environment	Sheet metal supplier	• ISO 14001 Certificate or Environmental Audit • Operating License • Fire Department Inspection Certificate • Certificate for Movement of Waste of Environmental Interest (CADRI)
Environment	Laboratory testing service provider	• Business Operating Permit; • Fire Department Inspection Certificate; • ISO 14001 Certificate (optional); • ISO/IEC 17025:2005 Certificate (covering the parameters to be analyzed); • Chemical Technical Responsibility Certificate.
Environment	Pest control service provider	• ISO 14001 Certificate (optional); • Fire Department Inspection Certificate; • Sanitary Surveillance Operating License; • Technical Responsibility Statement.
Environment	Painting service provider	• Environmental Audit (optional); • ISO 14001 Certificate (optional); • Operating License; • Fire Department Inspection Certificate.
Environment	Cleaning service provider for racks/industrial towels	• Operating License; • Fire Department Inspection Certificate; • ISO 14001 Certificate (optional).

Environment	Fire extinguisher maintenance service provider	• Fire Department Inspection Certificate; • INMETRO Certification; • ISO 14001 Certificate (optional); • Statement of procedures for the collection, storage and disposal of extinguisher chemical powders.
Environment	Deburring/painting service provider	• Environmental Audit (optional); • ISO 14001 Certificate (optional); • Operating License; • Fire Department Inspection Certificate.
Environment	Hose and hydrant maintenance service provider	• Fire Department Inspection Certificate • INMETRO Certification • ISO 14001 Certificate (optional);
Environment	Refrigeration service provider	• Statement of procedures for the collection, storage and disposal of gases controlled under the Montreal Protocol.
Environment	Waste/effluent disposal service provider (hazardous/non-hazardous)	• Environmental Audit (optional); • ISO 14001 Certificate (optional); • Operating License; • Federal Technical Registry (CTF/IBAMA); • Fire Department Inspection Certificate. Note: If transport is the contractor's responsibility, also request the documents required for external transport suppliers of hazardous products/waste
Environment	Heat/surface treatment service provider	• Environmental Audit or ISO 14001 Certificate; • Operating License; • Fire Department Inspection Certificate.
Environment	Internal transport provider	• ISO 14001 Certificate (optional); • MOPP license - Handling and Operation of Dangerous Goods, for truck drivers; • Forklift Operator Certificate, for forklift operators; • PAE - Emergency Response Plan; • Environmental Insurance (optional).
Environment	External transport supplier of hazardous products/waste	• ISO 14001 Certificate (optional); • Fire Department Inspection Certificate; • Emergency Response Plan; • Environmental Insurance (optional).
Environment	Chemical products manufacturer	• Operating License; • Fire Department Inspection Certificate; • ISO 14001 Certificate (optional). Note: If transport is the contractor's responsibility, also request the documents required for external transport suppliers of hazardous products/waste.
Environment	Resin manufacturer (foundry)	• Operating License; • ISO 14001 Certificate (optional); • Fire Department Inspection Certificate. Note: If transport is the contractor's responsibility, also request the documents required for external transport suppliers of hazardous products/waste.

Environment	Wooden packaging supplier	• Operating License; • Federal Technical Registry (CTF/IBAMA); • Fire Department Inspection Certificate; • ISO 14001 Certificate (optional); • Wood Origin Certificate; • Accreditation Certificate from the Ministry of Agriculture, Livestock and Food Supply - MAPA (where applicable); • Technical Responsibility Statement (where applicable).
Environment	Environmental consulting	• Federal Technical Registry (CTF/IBAMA); • Fire Department Inspection Certificate (optional) • Registration with the Brazilian Bar Association (OAB), where applicable
Environment	Gas manufacturer	• Operating License; • Federal Technical Registry (CTF/IBAMA); • Fire Department Inspection Certificate; • ISO 14001 Certificate (optional). Note: If transport is the contractor's responsibility, also request the documents required for external transport suppliers of hazardous products/waste.
Occupational Health and Safety	Engineering consulting service provider (inspection of lifting devices, non-catalog devices, etc.)	• Credentials of the qualified professional (e.g., CREA/CRQ registration, diploma, etc.)
Occupational Health and Safety	Health laboratories	• Accreditation
Occupational Health and Safety	Occupational safety training provider	• Credentials of the qualified professional (e.g., CREA/CRQ registration, diploma, etc.)

Notes:

1. Continuous non-critical on-site service providers are covered by Romi's environmental management system and shall follow internal standards and procedures (cafeteria, employee transportation, landscaping, etc.) and the operational controls already established in the Supplier Management System. The contracting party is responsible for controlling the required documents;
2. Every carrier shall be inspected when waste is sent for disposal, in accordance with II 42.07-8-0569 - Scrap and Waste Depot Operation;
3. Off-site audits shall only be conducted with a sound justification;

Notes:

- Continuous, non-critical internal service providers are included in Romi's environmental management system and follow internal standards and procedures;
- Every carrier will be inspected when waste is sent for disposal;
- Environmental audits of machining, heat-treatment, painting and deburring suppliers will be performed only in cases of exclusivity, meaning that 85% or more of their production is dedicated to Romi. Waste-disposal suppliers will be audited when hazardous waste is involved.

2.2 SUPPLIER ENVIRONMENTAL EVALUATION AND QUALIFICATION

Suppliers classified as critical are evaluated according to the following table:

SUPPLIER	TYPE OF EVALUATION/DOCUMENTS
Supplier of outsourced machined items	• Environmental Audit (optional); • ISO 14001 Certification (optional); • Operating license; • Fire Department Inspection Record.
Laboratory Analysis Service Supplier	• Business license; • Fire Department Inspection Report; • ISO 14001 Certification (optional); • ISO/IEC 17025: 2005 Certification (referring to the parameters to be analyzed); • Chemical responsibility certificate.
Pest Control Service Supplier	• ISO 14001 Certification (optional); • Fire Department Inspection Report; • Health surveillance operating license; • Term of technical responsibility.
Painting Service Supplier	• Environmental Audit (optional); • ISO 14001 Certification (optional); • Operating license; • Fire Department Inspection Record.
Industrial Hooks/Towel Cleaning Service Supplier	• Operating license; • Fire Department Inspection Report; • ISO 14001 Certification (optional).
Fire Extinguisher Maintenance Service Supplier	• Fire Department Inspection Report; • Certified by INMETRO; • ISO 14001 Certification (optional); • Term with the procedures regarding the collection, storage and disposal of chemical powders extinguishers.
Deburring / Painting Service Supplier	• Environmental Audit (optional); • ISO 14001 Certification (optional); • Operating license; • Fire Department Inspection Record.
Cooling Service Supplier	• Term with the procedures related to the collection, storage and disposal of gases controlled by the Montreal Protocol.
Waste/Effluent Disposal Service Supplier	• Environmental Audit (optional); • ISO 14001 Certification (optional); • Operating license; • CTF IBAMA; • Fire Department Inspection Record. Note: In case of transport under the responsibility of the contracted company, also request documents from the category of the hazardous product/waste external transportation supplier.
Heat/Surface Treatment Service Supplier	• Environmental Audit or ISO 14001 Certification; • Operating license; • Fire Department Inspection Record.
Inland transportation supplier	• ISO 14001 Certification (optional); • MOPP Portfolio - Handling and Operation of Dangerous Products,

	- by truck drivers; - Forklift Operator Certificate, for forklift trucks; - PAE - Emergency Response Plan; - Environmental Insurance (optional).
Hazardous product/waste external transportation supplier	- ISO 14001 Certification (optional); - Fire Department Inspection Report; - Emergency service plan; - Environmental Insurance (optional).
Chemicals Manufacturer	- Operating license; - Fire Department Inspection Report; - ISO 14001 Certification (optional). Note: In case of transportation under the responsibility of the contracted company, also request documents from the category of the hazardous product/waste external transportation supplier.
Resin Manufacturer (Casting)	- Operating license; - ISO 14001 Certification (optional); - Fire Department Inspection Record. Note: In case of transportation under the responsibility of the contracted company, also request documents from the category of the hazardous product/waste external transportation supplier.
Wood Packaging Suppliers	- Operating license; - CTF IBAMA; - Fire Department Inspection Report; - ISO 14001 Certification (optional); - Wood Origin Certificate; - Accreditation Certificate at the Ministry of Agriculture, Livestock and Supply - MAPA (if applicable); - Technical Responsibility Term (when applicable).
Environmental Consulting	- CTF IBAMA; - Fire Department Inspection Report (optional) - Registration with the Bar Association (if applicable)
Gas Manufacturer	- Operating license; - CTF IBAMA; - Fire Department Inspection Report; - ISO 14001 Certification (optional). Note: In case of transport under the responsibility of the contracted company, also request documents from the category of the hazardous product/waste external transportation supplier.

2.2.1 ENVIRONMENTAL QUALIFICATION OF CRITICAL SUPPLIERS EVALUATED THROUGH DOCUMENT SUBMISSION AND ENVIRONMENTAL AUDIT

Critical suppliers evaluated according to the table in item 2.2 are environmentally qualified based on the documentation submitted or the audit performed and are classified under one of the following established criteria:

Classification	Description	Disposition	Action
Green	All documents listed in the table under requirement 2.2 are verified (Score: 180)	Purchase	The company is qualified to be a Romi supplier, and items and/or services may be purchased.
Yellow	Partial verification of the documents listed in the table under requirement 2.2 (Score: 150) Note: If a Preliminary License, Installation License or Operating License has a renewal request filed within the legal period (120 days before expiration), the supplier will remain in this category until the document is issued.	Purchase	The action plan will be monitored by Romi, and items and/or services may be purchased in the meantime.
Red	Failure to verify the documents listed in the table under requirement 2.2, or lack of Environmental Licensing (Score: 0)	Do not purchase	Items and/or services may not be purchased, except in exceptional cases with approval from the supervisor or manager of the responsible area.

3. SUPPLIER EVALUATION - COMPLIANCE

The Compliance Program ('Program') of Industrias Romi S.A. and its subsidiaries ('Company' or 'ROMI') establishes guidelines for preventing, detecting and correcting practices that are improper or inconsistent with external and internal Laws, Standards and Regulations. It encourages the reporting of irregularities and guides and requires ethical and responsible conduct by its members, serving as an important corporate-governance instrument.

3.1. ROMI CODE OF ETHICS AND BUSINESS CONDUCT - SUPPLIERS

The Company seeks the highest standards of integrity, transparency and reliability in all its business activities and relationships, guided by a set of ethical and moral values.

The Romi Code of Ethics and Business Conduct can be accessed at <https://www.romi.com/investidores/governanca-corporativa/compliance/codigo-de-conduta/>.

We seek relationships with our suppliers based on technical and transparent criteria and conducted ethically and respectfully. The Code of Ethics and Business Conduct covers all the items below:

1. Applicability
2. Principles and values
3. Conduct guidelines:

- 3.1. Discriminatory actions
- 3.2. Use of alcohol, drugs and weapons
- 3.3. Relationships with business partners
- 3.4. Receipt/offering of gifts
- 3.5. Fraud, bribery and corruption
- 3.6. Relationships with authorities and government agencies
- 3.7. Relationships with Shareholders and Investors
- 3.8. Relationships with the press
- 3.9. Social responsibility
- 3.10. Environment
- 3.11. Health and safety
- 3.12. Freedom of association
- 3.13. Use of company assets
- 3.14. Use of information/confidentiality
- 3.15. Outside activities
- 3.16. Activities unrelated to the Company's interests and business
- 3.17. Relatives/romantic relationships
- 3.18. Potential conflict situations
- 4. Reporting channel
- 5. Management of the Code of Ethics and Business Conduct
- 6. Advisory bodies
- 7. Miscellaneous
- 8. Message from the President
- 9. Conflict-of-interest declaration / Acceptance declaration

3.1.1. RELATIONSHIPS WITH BUSINESS PARTNERS

3.1.1.1. All relationships with Romi business partners, such as Customers, Suppliers and Service Providers, shall be based on technical and transparent criteria and conducted ethically and respectfully, fostering long-lasting, trusted relationships aligned with corporate objectives.

3.1.1.2. Employees who have a family relationship or personal interest involving any Romi business partner may not participate in any Company decision or use the privileges of their position or influence in matters related to that partner.

3.1.1.3. The use of Romi's name to purchase goods, hire services or obtain loans for personal purposes or for third parties, while benefiting from credit or special discounts granted to the Company, will be considered a conflict with Romi's interests.

3.1.1.4. Receiving benefits such as payments, gifts, loans, entertainment, travel, employment for relatives or favors of any nature from individuals or legal entities that are current or potential Company business partners will be considered a conflict with Romi's interests.

3.1.1.5. Employees acting on behalf of Romi ('Internal Employees') who have any type of relationship, including a family relationship, with persons commercially connected to Romi, whether Suppliers, Investors or Partners, shall notify the Company through Internal Audit and disclose that relationship whenever such Internal Employees have influence as a result of their activities within the Company.

3.1.2. RECEIPT/OFFERING OF GIFTS

3.2.2.1. The exchange of promotional items, services and gifts shall be conducted with caution and transparency so that it does not influence, or appear to influence, business decisions.

3.2.2.2. The receipt or offering, by an Internal Employee or persons associated with that Employee, of non-cash promotional items with a market value of up to 20% (twenty percent) of the current federal minimum wage in each calendar year will not be considered a conflict of interest.

3.2.2.3. Promotional items, services or gifts exceeding this value shall be returned or, if return is not possible, forwarded to the Human Resources Manager, who will determine their final disposition.

3.1.3. FRAUD, BRIBERY AND CORRUPTION

Romi has an Anti-Corruption and Anti-Bribery Policy available on its website.

3.2.3.1. Employees shall conduct their relationships with private organizations and their respective employees in strict compliance with applicable legislation, standards and procedures and with the Code of Ethics, refraining from acts of corruption listed in the Anti-Corruption Law, including, without limitation:

- (i) Promising, offering or giving, directly or indirectly, an undue advantage to an employee of a Private Organization or to a third party related to that employee;
- (ii) Contributing to unlawful acts against a Private Organization in order to obtain a benefit;
- (iii) Using an intermediary individual or legal entity to conceal or disguise the Employee's true interests or the identity of the beneficiaries of the acts performed;
- (iv) Obtaining an undue advantage or manipulating the economic and financial balance of contracts through fraud in contracts and/or related instruments entered into with Private Organizations;

3.2. ROMI REPORTING CHANNEL

Romi Employees and suppliers who become aware of any situations, acts, facts or practices that violate this Code or the policies, legislation or regulations applicable to the Company shall report them through the Company's Reporting Channel, available on Romi's website at romi.com under the 'Contact Us' link.

Romi's Reporting Channel enables transparent and anonymous communication and ensures impartial and confidential handling. Reports made through the channel will be reviewed by Internal Audit and the Executive Ethics Committee, which will handle each case appropriately, maintain confidentiality and protect the identity of the reporting party. Retaliation of any kind will not be tolerated.

3.3. SUPPLIER EVALUATION REQUIREMENTS REGARDING COMPLIANCE

1. Is the company familiar with the Romi Compliance Program and the Code of Ethics and Business Conduct? <https://www.romi.com/investidores/governanca-corporativa/compliance/>; <https://www.romi.com/investidores/governanca-corporativa/compliance/codigo-de-conduta/>;
2. Is the company familiar with Romi's communication channels for reporting an ethical concern? <https://www.romi.com/fale-conosco/>
3. Is the company currently involved, or has it ever been involved, in any corruption, money-laundering or fraud proceeding? If yes, provide the related information, which will be reviewed by Romi's Compliance area.
4. Does the company have a code of ethics and a defined frequency for training its employees?

Note: If the company has its own Compliance Program, it may choose not to adhere to Romi's Program, provided that it declares and documents that its Compliance Program fully meets the requirements of Romi's Program.

4. SUPPLY CHAIN SECURITY – CONTRACTUAL REQUIREMENTS FOR SERVICE PROVIDER

As part of our commitment to the Authorized Economic Operator (AEO) Program, we require all our partners - including carriers, logistics operators, port terminals, freight forwarders and customs brokers - to adopt security practices compatible with the international standards applicable to the supply chain.

When entering into contractual agreements with our company, providers must meet the following requirements:

4.1. EVALIATION AND CONTINUOUS IMPROVEMENT OF SECURITY

The partner must regularly evaluate its operational processes and implement security measures that prevent unauthorized access, cargo detour, smuggling, contamination of goods and other risks relevant to the transport and movement of goods.

4.2. INCLUSION OF SECURITY CLAUSES IN CONTRACTS WITH THIRD PARTIES

Where applicable, the partner must extend this commitment to its own contractors or subcontractors (such as aggregate drivers, warehousemen, port operators or legal representatives), through contractual clauses that establish obligations compatible with the principles of the AEO Program.

4.3. ADDITIONAL CONTROLS DEPENDING ON THE RISK

For operations with a higher degree of risk, specific measures may be required, such as:

- Inspection and integrity of seals on vehicles and containers;
- Electronic monitoring (tracking, geolocation);
- Registration and access control at port facilities and distribution centers;
- Background checks and licensing of employees with direct access to cargo or sensitive documentation;
- Protocols for communicating and reporting incidents during transport and dispatch.

4.4. COLLABORATION IN AUDITS AND CORRECTIVE ACTIONS

The partner must collaborate with internal or external audits, respond promptly to requests for information and implement any corrective actions linked to the security and compliance of logistics processes.

Failure to comply with these requirements may result in operational and commercial restrictions, as provided for in the contract.