

DEPARTMENT OF GOVERNANCE, RISK AND INTEGRITY.

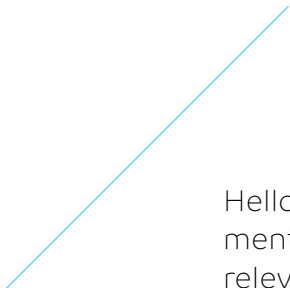
# COMPLIANCE

PROGRAM

DEGRI. 2197

GIFTS,  
PRESENTS AND  
HOSPITALITY





Hello! We are glad you found this document. On the following pages you will find relevant information about the policy on gifts, presents and hospitality adopted by C.Vale.

Please read it carefully and if you have any questions, we are available to guide you.



## OBJECTIVE

Establish criteria and guidelines that must be observed when offering and accepting gifts, presents, entertainment and hospitality.

Published in February 2025

# GIFTS, PRESENTS AND HOSPITALITY

**Gifts:** objects with low unit value, generally promotional and personalized with the sponsoring company's brand, such as pens, diaries, t-shirts, caps and keychains.

**Presents:** products and services with higher values than gifts and generally not personalized, such as baskets of products, flowers, bottles of drinks and boxes of chocolates.

**Hospitality:** includes social entertainment, travel (domestic or international), transportation, meals, tickets to cultural, scientific and sporting events, among others.

We understand that gifts, presents and hospitality can contribute positively to commercial and political relations, respecting the cultures of the countries in which they are offered or received.

# GIFTS, PRESENTS AND HOSPITALITY

The receipt of gifts, presents, social entertainment, prizes and gestures of hospitality should never be used as a means of exchanging favors, to obtain undue advantages, influence decisions or for the purpose of facilitating the contracting or maintenance of business and benefiting third parties.

We understand that gifts, presents, social entertainment, prizes and gestures of hospitality can only be offered or accepted if:

# GIFTS, PRESENTS AND HOSPITALITY

## They are granted or received:

- ✓ To help promote the brand, such as demonstrating or explaining products and services;
- ✓ To celebrate special dates and festivities, such as city, state and religious anniversaries;
- ✓ At corporate ceremonies or events.
- ✓ They are granted or received in a transparent manner and do not cause any embarrassment in the event of public exposure for C.Vale or its Employees;
- ✓ They have reasonable costs and are in accordance with the values described in this document and in national and foreign legislation.

**NOTE 1:** It is not recommended to accept or offer alcoholic beverages. Specific cases due to cultural/regional peculiarities must be assessed by the Board of Directors, its President and/or Executive Director – CEO.

## GIFTS, PRESENTS AND HOSPITALITY

Gifts and presents may be accepted as long as they constitute an accepted local commercial and political practice, do not exceed common courtesy customs and do not exceed the value of R\$300.00 (three hundred reais). For the international market, the reference value is USD 100.00 (one hundred dollars).

Gifts, presents and hospitality are restricted to private entities, and their offering or receipt by public servants who have passed a public exam or are appointed by municipal, state or federal government agencies is prohibited.

Hospitality, including invitations to meals, participation in events, trips, training sessions, conferences and seminars must be directed to C.Vale and have a clear purpose related to the Cooperative's business and be in accordance with the premises of the items on page 04.

## GIFTS, PRESENTS AND HOSPITALITY

Employees who intend to receive or offer hospitality must request approval from their manager and/or the Board of Directors, its President and/or Executive Director – CEO.

Participation in conferences, training sessions or seminars, when essential, from the point of view of technical updating and competitiveness, may be offered by a business partner and the area may accept, as long as the costs are paid preferably by C.Vale (registration, travel expenses, accommodation, etc.).

If the business partner insists on fully paying for participation in conferences, training or seminars, under the terms above, this may occur as long as it is approved by the Board of Directors, its President and/or Executive Director – CEO.

It is prohibited to accept invitations that are exclusively for entertainment purposes.

# GIFTS, PRESENTS AND HOSPITALITY

**Specific rules for purchasing departments:** It is forbidden to accept commissions, benefits, advantages or any privileges from suppliers when making purchases/hiring.

**Roles and responsibilities:** All managers are responsible for applying, disseminating and complying with the information contained in this document.

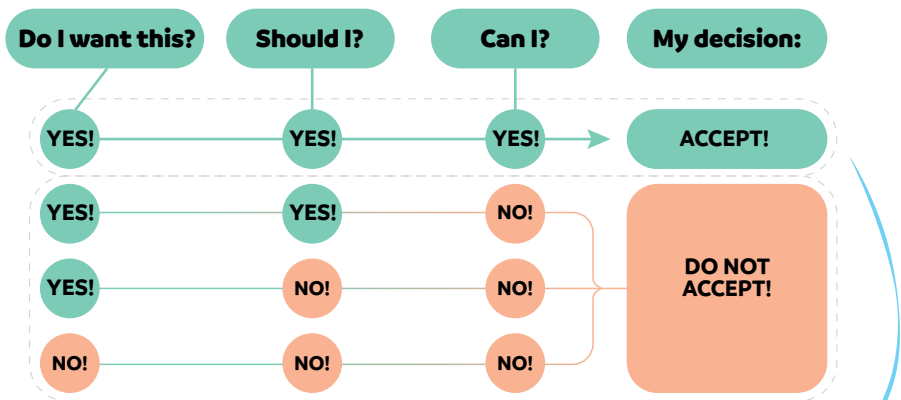
It is the responsibility of C.Vale employees to disseminate the guidelines set out herein, comply with them and report any cases of deviations.

The Human Resources Department is responsible for receiving reports via the whistleblower channel, investigating the facts with the committee and carrying out negotiations in accordance with the appropriate measures.



# GIFTS, PRESENTS AND HOSPITALITY

If someone offers you a gift, present or hospitality, use the three key questions to answer, in a practical way, whether or not you should accept it. See how simple it is:



**In short:** if the answer is yes to all three questions, then you can accept it. If not, don't accept it.

Remember: when in doubt, get informed!

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