



# INTERNATIONAL SANCTIONS POLICY

## 1 OBJECTIVE

This Policy aims to establish guidelines and procedures to ensure that Grupo Inpasa Brasil (including all subsidiaries and controlled affiliates, also referred to herein as the “Company”), on its own initiative, complies with applicable international sanctions, reinforcing Grupo Inpasa Brasil's commitment to maintaining the highest standards of integrity, ethics, and governance in conducting its business.

## 2 APPLICATION AND SCOPE

The provisions of this Policy apply to all members of Grupo Inpasa Brasil, subjecting all its directors, employees — regardless of position and/or role — and third parties acting on behalf of or for the benefit of the Company.

## 3 CONCEPTS AND ABBREVIATIONS

**Sanctions Target:** any individual or entity (i) listed in any Sanctions List, (ii) located, organized, or residing in, or part of the government of, a Sanctioned Jurisdiction, or (iii) directly or indirectly owned 50% or more, controlled or acting on behalf of one or more of the above-mentioned entities.

**Sanctioned Jurisdiction:** a country or territory that is the target of comprehensive territorial Economic Sanctions (i.e., an embargo). [See ANNEX I – SANCTIONS RISK TABLE of this Policy.]

**Sanctions Lists:** Official lists published by a government or international organization that include individuals, entities, companies, vessels, or countries that are targets of Economic Sanctions. For the purposes of this Policy, the sanctions lists of the European Union, United Kingdom, United Nations Security Council, and United States will be considered Sanctions Lists.

**Economic Sanctions:** Restrictions imposed by the European Union, the United Kingdom, the United Nations Security Council or the United States that limit or prohibit activities (general or specific) with certain countries, territories, entities, or individuals, consisting of asset freezes and/or economic, trade, or financial restrictions. These may be comprehensive or selective, aiming to achieve foreign policy or national security objectives.

## 4 ASSOCIATED AND REFERENCE DOCUMENTS

Not Applicable

## 5 OCCUPATIONAL HEALTH AND SAFETY INSTRUCTION (HAZARDS AND RISKS)

Not Applicable

## 6 ENVIRONMENTAL ASPECTS (ASPECTS AND IMPACTS)

Not Applicable

REVISION | 0

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CLASSIFICATION OF INFORMATION | EXTERNAL USE

01



## **7 RESPONSIBILITIES**

### **7.1 EMPLOYEES**

Comply with this Policy, participate in mandatory training related to Economic Sanctions as directed by the Compliance Department, and promptly report to the Compliance Department any indication of Economic Sanctions violations or involvement with Sanctions Targets or Sanctioned Jurisdictions.

### **7.2 COMPLIANCE DEPARTMENT**

Lead the implementation of this Policy, conduct training on Economic Sanctions, carry out due diligence analyses according to Company guidelines, including sanctions screening, maintain this Policy and verification systems up to date, review and dispose of any resulting hits, monitor risks related to Economic Sanctions, and investigate incidents of potential violations of this Policy or of Economic Sanctions.

### **7.3 PROCUREMENT**

Ensure that suppliers are not Sanctions Targets, validate risks with the Compliance Department, and immediately halt any transactions or dealings that present Economic Sanctions risk, reporting them to the Compliance Department.

### **7.4 COMMERCIAL AREAS**

Avoid transactions with Sanctions Targets and Sanctioned Jurisdictions, ensure third parties correctly and promptly complete the “Know Your Third Party” form, validate risks with the Compliance Department, and report any red flags related to Economic Sanctions to the Compliance Department.

### **7.5 LEGAL DEPARTMENT**

Ensure the inclusion of contractual clauses regarding Economic Sanctions and support the analysis and response to potential violations. Consult with and advise the Compliance Department with respect to Economic Sanctions, as appropriate.

### **7.6 INTERNAL AUDIT**

Assess the effectiveness of controls and annually review processes related to compliance with Economic Sanctions, report deviations to senior management, and recommend improvements to ensure the Company’s compliance with applicable Economic Sanctions and this policy.



## 8 GENERAL PROVISIONS

### 8.1 ECONOMIC SANCTIONS AND INTERNATIONAL OPERATIONS

Grupo Inpasa Brasil is committed to complying with applicable laws, regulations, and international conventions in the jurisdictions where it operates. Accordingly, all international operations or transactions of the Company must undergo prior analysis to prevent business dealings with Sanctions Targets or Sanctioned Jurisdictions.

Violations of applicable international sanctions can result in severe legal penalties for both the Company and its employees, including, but not limited to, fines and imprisonment.

#### 8.1.1 APPLICATION OF ECONOMIC SANCTIONS

It is important to note that Economic Sanctions apply to transactions linked to the financial system of the sanctioning jurisdiction, even when the parties involved are outside the corresponding territory. This occurs, for example, when U.S. dollars or U.S. banks, euros or EU financial institutions, or British pounds or UK banks are used in the transaction.

Economic Sanctions also apply where an individual or entity subject to the jurisdiction of the sanctioning jurisdiction is involved in the transaction. For example, any transaction with a U.S. company must be in accordance with Economic Sanctions administered by the United States.

#### 8.1.2 COUNTRY-BASED ECONOMIC SANCTIONS

The list of Sanctioned Jurisdictions can be consulted in **ANNEX I – SANCTIONS RISK TABLE** of this Policy.

The United States also prohibits transactions with the Government of Venezuela or any company owned or controlled by the Government of Venezuela.

Additionally, **a significant number of activities with or related to Russia are prohibited or restricted under Economic Sanctions maintained by the United States, the United Kingdom, and the European Union.**

#### 8.1.3 GENERAL PROHIBITIONS

Grupo Inpasa Brasil prohibits any interaction with or involving Sanctioned Jurisdictions as listed in **ANNEX I** or with any Sanctions Target. Transactions involving High-Risk Jurisdictions listed in **ANNEX I** must be submitted for mandatory review by the Compliance Department.

Such activities include but are not limited to:



- The export or import of goods, technology or services to, from, or through a Sanctioned Jurisdiction to or from any destination;
- Financial transactions or contracts or other dealings with a Sanctions Target.
- Sales to, purchases from, or dealings in goods, services or technology of, a Sanctions Target;
- Transactions or dealings in the property of a Sanctions Target; and
- Investments in or with a Sanctions Target.

It is important to note that the Sanctions Lists are dynamic and periodically (sometimes frequently) updated. Therefore, operations involving entities and individuals from various jurisdictions not listed in **ANNEX I** may be prohibited by the Compliance Department due to the risks involved.

#### 8.1.4 FOREIGN NATIONALS

In some cases, Economic Sanctions laws require compliance by citizens and permanent residents of the sanctioning country, regardless of where the individual is located.

Employees may not perform any role in a transaction with a country or individual that is a Sanctions Target designated by the country of their citizenship or permanent residence without consulting the Compliance Department.

Accordingly, employees who present any risk or have responsibilities related to Economic Sanctions must complete the **NATIONALITY INFORMATION QUESTIONNAIRE** for internal mapping purposes.

### 8.2 ECONOMIC SANCTIONS SCREENING/THIRD-PARTY DUE DILIGENCE

Third parties, their direct and indirect beneficial owners, and vessels involved in international transactions must be previously identified and submitted for analysis, in accordance with the Due Diligence Policy, to ensure they are not listed in any Sanctions Lists or located in Sanctioned Jurisdictions.

Grupo Inpasa Brasil shall conduct risk-based Economic Sanctions screening to the extent and in the manner determined by the Compliance Department, including periodic screening of customers and vendors. The Company shall maintain written records of the results of such screening in the manner determined by the Compliance Department.

#### 8.2.1 RED FLAGS

The following red flags may indicate potential Economic Sanctions violations or risks and must be reported to the Compliance Department as soon as identified:



- Counterparty has a name or address similar to a Sanctions Target;
- Use of unusual trade routes or financial conditions;
- Counterparty or its agent is reluctant to provide basic information about their identity, product use, and/or transaction destination;
- Clients located or operating in Sanctioned Jurisdictions;
- Payments made through parties or jurisdictions unrelated to the transaction;
- Use of personal emails and addresses by transaction parties;
- Vague shipping or delivery terms or indications of reshipment;
- Transactions structured to avoid detection by verification systems; and/or
- Documentation discrepancies or contradictory information.

### 8.3 CONTRACTUAL CLAUSES

Where deemed appropriate by the Legal Department, contracts entered into by Grupo Inpasa Brasil will include clauses that require compliance by the counterparty with the guidelines established in this Policy and with applicable Economic Sanctions. They will also include a right for Grupo Inpasa Brasil to terminate the contract in case of non-compliance by the counterparty.

### 8.4 TRAINING

Certain employees may be required to complete periodic training sessions on Economic Sanctions and the requirements of this Policy.

### 8.5 EVIDENCE RETENTION PERIOD

All evidence related to the any analysis conducted by Grupo Inpasa Brasil of third parties, considering Economic Sanctions risks, must be stored for a minimum period of ten (10) years.

### 8.6 POLICY APPROVAL AND REVIEW

This Policy enters into force for an indefinite period on the date of its publication and must be reviewed annually.

## 9 DISCIPLINARY MEASURES

If an incident is reported and, after investigation, it is verified that an employee violated this Policy and/or applicable legislation, immediate and exemplary corrective measures will be taken, always in accordance with the circumstances, severity, and applicable law.

In addition to corrective measures, legal actions may be taken to establish civil and/or criminal liability and to recover any damages to the Group's assets or shareholders.

Regarding violations committed by third parties, the respective contracts may be terminated by Grupo Inpasa Brasil, and contractual penalties may be applied due to non-compliance, along with appropriate legal measures in civil and/or criminal courts.



## 10 ETHICS HOTLINE

Grupo Inpasa encourages all employees and third parties to report situations that may constitute violations of the rules set forth in this Policy and/or in applicable legislation, with full confidentiality of the reporting individual guaranteed.

If you become aware of conduct that is contrary to the principles and rules established in this Policy, please report it through the compliance channel ([inpasa.com.br/etica/canal-de-denuncia](https://inpasa.com.br/etica/canal-de-denuncia)) or by calling **0800 800 9595**.



# ANNEX I – SANCTIONS RISK TABLE

## Updated 08/2025

<b>PROHIBITED JURISDICTIONS</b>		
Cuba	Iran	North Korea
Crimea	Donetsk	Luhansk
Venezuela	Russia	
Kherson	Zaporizhzhia	
<b>HIGH-RISK JURISDICTIONS</b>		
Afghanistan	Lebanon	Tunisia
Belarus	Liberia	Turkey
Bosnia-Herzegovina	Libya	Ukraine
Burundi	Mali	Syria
Ethiopia	Myanmar/Burma	Somalia
Guinea	Moldova	South Sudan
Guinea-Bissau	Nicaragua	Sudan
Hong Kong	Central African Republic	Yemen
Iraq	Democratic Republic of the Congo	Zimbabwe

