



ENVIRONMENTAL AND SUSTAINABILITY POLICY

Tectril integrates environmental responsibility, operational efficiency and governance into its decisions, seeking to prevent impacts, comply with the law and promote continuous improvement across its operations and value chain.

LANGUAGE	English
CODE	02-EN
REVISION	0
STATUS	Institutional draft for internal approval

NOTE This Policy becomes effective upon formal approval. Applicable legal and contractual obligations shall prevail whenever they are more stringent.

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1. Purpose

To establish the principles, commitments, responsibilities and guidelines of Tectril Soluções em Logística e Comércio Ltda. for environmental protection and sustainability across its activities, decisions, facilities, services and business relationships.

This Policy guides the prevention and control of environmental impacts, efficient resource use, responsible waste management, emission reduction and continuous improvement of environmental performance, in a manner consistent with the organization's size, context and risks.

2. Scope

This Policy applies to directors, leaders, employees, apprentices, interns and all other persons acting on behalf of Tectril, across all units, facilities, projects and operations under its control.

Suppliers, service providers, carriers, customs brokers, partners and other third parties shall comply with the applicable provisions of this Policy, in addition to the legal, contractual and technical requirements relevant to their activities. When work is performed at customer or partner premises, more protective local rules shall also be observed.

3. Principles

- compliance with legislation and other applicable requirements;
- pollution prevention and application of the precautionary principle in the face of relevant risks;
- efficient use of water, energy, fuels, materials and other resources;
- priority to prevention, reduction, reuse, recycling, treatment and environmentally sound disposal of waste;
- consideration of life-cycle and value-chain impacts, where applicable;
- shared responsibility, traceability and accountability;
- continuous improvement based on risks, data, targets and evidence;
- responsible transparency, without misleading or unsubstantiated environmental claims;
- respect for people, communities, biodiversity and future generations.

4. Legal compliance and other requirements

Tectril shall identify and comply with applicable federal, state and municipal environmental legislation, as well as licenses, permits, conditions, technical standards and contractual requirements related to its activities.

Before starting or materially changing an activity, facility, service or project, the responsible area shall assess the need for licensing, authorization, registration, operational control or engagement of a qualified professional or company.

Environmental records, receipts, manifests, certificates, licenses and evidence shall be retained for the applicable legal or contractual period and in accordance with internal records-management rules.

5. Management of environmental aspects, impacts and risks

Tectril shall periodically assess the environmental aspects of its activities and the associated actual or potential impacts, considering normal, abnormal and emergency conditions.

- consumption of energy, water, fuels, paper, packaging and other materials;
- greenhouse-gas and other pollutant emissions, where applicable;
- generation, storage, transport and disposal of waste;
- noise, effluents, spills, leaks and contamination;
- land use, facility location, biodiversity and sensitive areas;
- impacts from carriers, suppliers and other relevant links in the value chain.

Significant risks shall have proportionate controls, defined owners, evidence of performance and response actions. Operational changes shall be assessed before implementation when they may alter the environmental risk profile.

6. Resource efficiency

- take reasonable measures to reduce waste and improve energy and water efficiency;
- prioritize lower-consumption equipment, lighting and solutions where technically and economically feasible;
- encourage digital processes and printing only when necessary, preferably double-sided;
- plan purchases and inventories to prevent losses, obsolescence and premature disposal;
- promote preventive maintenance to reduce consumption, leaks, failures and emissions;
- consider durability, repairability, reuse and recycled content in purchasing decisions, where applicable.

7. Climate change and emissions

Tectril shall seek to understand and progressively reduce greenhouse-gas emissions associated with relevant sources under its control and, where feasible, across its value chain.

- monitor relevant electricity, fuel, travel and transportation consumption;
- optimize routes, load consolidation, vehicle utilization and logistics planning;
- assess lower-emission alternatives without compromising safety, legality or cargo integrity;
- establish inventories, targets or climate plans only when a methodology, scope, baseline and verifiable data are available;
- do not use claims such as “carbon neutral,” “zero emissions” or equivalents without technical basis, documentation and proper approval.

8. Waste, circularity and reverse logistics

Waste management shall follow the hierarchy of prevention, reduction, reuse, recycling, treatment and environmentally sound disposal of rejects.

- identify and segregate waste according to its characteristics and risks;
- temporarily store waste under safe, identified and compatible conditions;
- use duly authorized carriers and destination facilities where required;
- retain evidence of collection, transport, treatment, recycling or disposal;

- provide specific handling for electronics, batteries, lamps, oils, chemicals, contaminated packaging and other controlled or reverse-logistics waste;
- prohibit irregular disposal, open burning, or release into soil, stormwater systems or water bodies;
- favor repair, return, reuse, remanufacturing, parts recovery and asset life extension where technically and legally permitted.

In Repair & Return, warranty exchange, import, export, warehousing and transport operations, the customs or commercial classification of an item does not replace its correct environmental characterization. Materials deemed waste must also comply with applicable environmental and transboundary-movement controls.

9. Pollution prevention and environmental protection

- prevent spills, leaks, improper emissions and contamination of soil, water and air;
- keep chemicals, fuels and potentially hazardous materials identified and safely stored;
- adopt containment, inspection, maintenance and response measures compatible with the risks;
- avoid interventions or operations that may affect protected areas, water resources or biodiversity without the applicable assessment and authorization;
- immediately report and control any condition capable of causing environmental damage.

10. Responsible procurement and supply chain

Environmental criteria may be included in third-party selection, contracting, qualification and evaluation in proportion to risk, criticality and Tectril's influence.

- legal standing, applicable licenses and permits;
- management of waste, emissions, resources and hazardous substances;
- traceability and evidence of disposal;
- history of relevant incidents, sanctions or nonconformities;
- commitment to integrity, human rights, health and safety;
- ability to meet customer- or operation-specific environmental requirements.

Tectril may request evidence, conduct assessments, establish corrective plans or terminate relationships in cases of serious environmental risk, legal violation or unjustified refusal to correct nonconformities.

11. Sustainable logistics and transport

- plan routes and loads to reduce travel, idle capacity, consumption and emissions;
- select legally authorized carriers suited to the nature of the cargo;
- require additional controls for dangerous goods, waste or environmentally sensitive cargo;
- encourage proper maintenance, safe driving and operational efficiency;
- assess indicators for consumption, emissions, damage, returns and environmental occurrences when material.

12. Facilities and administrative operations

- maintain good water- and energy-use practices;
- segregate waste and provide proper identification at disposal points;
- control leaks, maintenance, cleaning, effluents and material storage;
- consider environmental criteria in renovations, leases, infrastructure, facilities and equipment purchases;
- instruct occupants, visitors and contractors on applicable environmental rules.

13. Environmental emergencies and incidents

Units and operations with relevant risks shall maintain preparedness and response measures compatible with identified scenarios. In an incident, the priorities are to protect people, stop the source when safe, contain the impact, notify responsible parties and meet mandatory reporting obligations.

- spill or leak of fuel, oil, chemicals or waste;
- fire with contamination potential;
- irregular disposal or transport;
- uncontrolled emissions, odors, effluents or noise;
- contamination of soil, water, drainage or neighboring areas;
- any event that may cause environmental harm, sanctions or reporting obligations.

Every incident or near miss shall be recorded, investigated and addressed with proportionate corrective actions. Notifications to authorities, customers, insurers or other parties shall be made by authorized persons within applicable deadlines.

14. Training, awareness and participation

Tectril shall provide guidance and training suited to the environmental duties and risks involved. Persons covered by this Policy must understand the controls applicable to their work, report deviations and contribute improvement opportunities.

Internal and external environmental communications shall be clear, consistent and based on verifiable information. No person may disclose targets, labels, certifications or environmental results on Tectril's behalf without prior validation.

15. Objectives, targets, indicators and transparency

Tectril may establish annual or multi-year environmental objectives and targets according to its significant aspects, strategic priorities and operational capacity.

- define the indicator, scope, unit of measure, owner, baseline and deadline;
- use identifiable data sources and retain evidence;
- monitor results and address deviations;
- review targets when operations, methodology or data availability change materially;
- communicate results in a balanced manner, including limitations and context where necessary.

This Policy does not, by itself, constitute a statement of ISO 14001 certification, adherence to a specific initiative, climate neutrality or achievement of any environmental target. Such statements may be made only when formally substantiated and approved.

16. Responsibilities

Role	Responsibility
Management/Board	approve this Policy, ensure proportionate direction and resources, and oversee relevant environmental matters.
Compliance	support interpretation of requirements, receive communications, monitor integrity risks and coordinate investigations where applicable.
Leadership	implement controls in their areas, guide teams, maintain records and address deviations.
Operations, Logistics and Facilities	apply technical and operational controls, manage providers and evidence, and respond to occurrences.
Procurement and contracting areas	include proportionate environmental requirements in third-party contracting and monitoring.
All personnel	comply with this Policy, prevent waste, report risks and refrain from activities for which they are not authorized or trained.
Third parties	comply with the law and contractual requirements, maintain licenses and evidence, and report incidents related to their services.

17. Questions and reporting concerns

Questions about this Policy may be sent to compliance@tectril.com.br. Suspected improper disposal, environmental document fraud, concealment of incidents, license falsification, greenwashing or other violations may be reported through Tectril's Integrity Channel.

Tectril prohibits retaliation against anyone who, in good faith, raises a concern, cooperates with an investigation or refuses to perform an act they reasonably believe to be illegal or environmentally harmful. Knowingly false or bad-faith reports may also be investigated.

18. Nonconformities and corrective measures

Violations of this Policy shall be reviewed impartially and may lead to guidance, training, process correction, action plans, disciplinary measures, suspension or termination of contracts, and reporting to authorities, depending on severity and applicable law.

Whenever possible, actions shall eliminate the cause, repair or mitigate impacts, prevent recurrence and strengthen controls.

19. Governance, approval and review

This Policy shall be reviewed periodically, preferably every two years, or earlier following relevant legal changes, significant operational changes, material incidents, audit results or improvement needs.

The current version shall state its approval date, approving authority and revision history. Translations shall remain aligned with the approved Portuguese version; in the event of an interpretation conflict, the Portuguese version shall prevail, unless applicable law requires otherwise.

KEY NORMATIVE REFERENCES

- Brazilian Federal Constitution of 1988, Article 225.
- Brazilian Law No. 6,938/1981 — National Environmental Policy.
- Brazilian Law No. 9,605/1998 — Environmental Crimes Law.
- Brazilian Law No. 12,187/2009 — National Climate Change Policy.
- Brazilian Law No. 12,305/2010 — National Solid Waste Policy.
- Brazilian Decree No. 10,936/2022 — regulates the National Solid Waste Policy.
- Applicable state and municipal environmental rules, CONAMA resolutions, licenses, permits, conditions and other requirements relevant to Tectril's activities.
- ABNT NBR ISO 14001 — Environmental management systems (voluntary reference; does not imply certification).

LEGAL REVIEW References should be confirmed during legal review and updated whenever necessary.

DOCUMENT CONTROL

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0	July 20, 2026	Initial issue for internal approval.

APROVAÇÃO / APPROVAL / APROBACIÓN

Name, title, date and signature