

TECTRIL

HUMAN RIGHTS, DIVERSITY AND INCLUSION POLICY

Commitment to dignity, respect, equity and belonging

Code	POL-HRDI-02-EN	Revision	0
Effective date	July 19, 2026	Owner	Compliance
Approval	Tectril Executive Management	Classification	Public

SCOPE

This Policy applies to Tectril Soluções em Logística e Comércio Ltda., its officers, leaders, employees, apprentices, interns, candidates, temporary workers, service providers, suppliers, business partners and any other third parties acting on Tectril's behalf or connected with its operations.

1. Purpose

To establish Tectril's principles, commitments and responsibilities for respecting and promoting human rights, diversity, equity and inclusion across employment relationships, business decisions, operations and the value chain.

This Policy guides the prevention, identification, reporting and handling of conduct or impacts that are incompatible with human dignity, ensuring a safe, respectful and accessible professional environment free from discrimination, harassment, violence and retaliation.

2. Guiding principles

- **Human dignity:** every person must be treated with respect, regardless of personal, social, cultural or professional characteristics.
- **Equal opportunity and equity:** decisions must be based on legitimate, objective and job-related criteria, with reasonable measures to remove barriers and broaden participation.
- **Diversity and inclusion:** differences in experience, identity, background, perspective and ability are recognized as sources of learning, innovation and better decisions.
- **Prevention and due diligence:** human rights risks and impacts must be considered in decisions, business relationships and operational activities.
- **Listening, dialogue and remedy:** concerns must be received in good faith, investigated impartially and addressed through proportionate measures, including correction and prevention of recurrence.
- **Non-retaliation:** no person will be punished or disadvantaged for raising a concern in good faith, cooperating with an investigation or exercising a protected right.

3. Human rights commitments

Tectril respects human rights recognized by applicable law and by international standards relevant to business. The company does not tolerate child labor, forced labor or slavery-like conditions, debt bondage, human trafficking, improper retention of documents, abusive restriction of movement or any form of exploitation.

Tectril respects freedom of association, collective bargaining and each person's right to join, or not join, legally established organizations without intimidation or discrimination.

The company seeks to ensure decent working conditions, compensation and working hours compliant with law, rest periods, occupational health and safety, and respectful treatment. Violations or serious risks must be reported and addressed as a priority.

4. Diversity, equity and inclusion

Tectril values diverse teams and promotes professional opportunities without discrimination. Unjustified distinctions based on race, color, ethnicity, nationality, origin, social class or status, sex, gender, gender identity or expression, sexual orientation, age, disability, health status, genetic characteristics, marital or family status, pregnancy, maternity, paternity, religion, belief, political opinion, union membership or any other status protected by law are prohibited.

Recruitment, hiring, compensation, development, performance evaluation, promotion, transfer, access to training, recognition and termination must follow professional, transparent and documentable criteria. Tectril may implement lawful affirmative action and equity measures to reduce inequality and increase representation.

Inclusion requires meaningful participation, psychological safety and respect. Leaders must encourage people to express ideas, prevent deliberate exclusion, distribute opportunities fairly and consider different needs without improperly disclosing personal information.

5. Persons with disabilities and accessibility

Tectril promotes the inclusion of persons with disabilities and seeks to remove physical, technological, communication, attitudinal and organizational barriers. Where applicable, reasonable accommodations will be assessed for recruitment, selection, onboarding, work performance, training, communication and professional development.

Accommodation requests will be handled respectfully, confidentially and on an individual basis, considering the person's needs, the effectiveness of the measure, safety and the essential requirements of the role. The requesting person must not be subjected to embarrassment, stigma or retaliation.

6. A workplace free from discrimination, harassment and violence

Any form of discrimination, racism, ableism, ageism, sexism, anti-LGBTQIA+ prejudice, xenophobia, religious intolerance or other conduct that demeans, excludes, humiliates, threatens or restricts the opportunities of a person or group is prohibited.

Bullying, moral or sexual harassment, unwanted sexual conduct, stalking, intimidation, threats, physical or psychological violence, humiliating exposure, offensive jokes, derogatory comments, discriminatory nicknames, unwanted physical contact, inappropriate messages or images, and abuse of authority are not tolerated.

This prohibition covers company premises, travel, events, training, digital communications, messaging applications, interactions with customers and suppliers, and any work-related setting. A stated intention to joke does not erase the impact or remove accountability.

7. Recruitment, people management and development

Job postings and selection processes must use requirements related to the duties and avoid discriminatory language or filters. Interviews must not probe personal matters that have no legitimate connection with the role or a legal requirement.

Performance reviews, promotions and compensation decisions must be based on consistent criteria and professional evidence. Conflicts of interest, favoritism and bias must be identified and mitigated.

Training and development opportunities must be accessible and distributed fairly. Where possible, the company will monitor indicators to identify barriers or relevant disparities, while respecting privacy and data protection law.

8. Health, safety and well-being

Tectril is committed to preventing accidents, occupational illness, violence and work-related psychosocial risks. Everyone must follow health and safety rules, report unsafe conditions and stop work in the face of serious and imminent risk, as applicable.

The organization encourages balanced and respectful working relationships, with attention to workload, communication, rest and appropriate support. Health information will be processed only for legitimate purposes, with restricted access and appropriate protection.

9. Suppliers, business partners and value chain

Tectril expects suppliers, service providers, agents, customs brokers, carriers and other partners to respect this Policy and applicable law. Human rights, integrity, working conditions, health and safety, and non-discrimination criteria may be included in selection, contracting, monitoring and renewal.

Indications of a violation may lead to requests for clarification, corrective action plans, monitoring, audits, suspension or termination of the relationship, depending on severity, recurrence, cooperation and legal feasibility. Priority will be given to preventing harm, protecting affected people and achieving effective correction.

10. Responsibilities

- **Executive Management:** approve the Policy, lead by example, provide proportionate resources and support independent investigation and remediation decisions.
- **Leaders:** act respectfully, prevent retaliation, take concerns seriously, involve Compliance and refrain from informal investigations that may expose people or compromise evidence.
- **Compliance:** provide guidance, receive and assess reports, coordinate impartial investigations, recommend controls and corrective measures, preserve records and report significant matters to Executive Management.
- **Employees and third parties:** know and comply with this Policy, respect all people, report risks or violations and cooperate truthfully and confidentially with investigations.
- **Human Resources or equivalent function:** support people processes, accessibility, prevention and disciplinary measures, subject to applicable confidentiality limits.

11. Raising concerns and Integrity Channel

Questions and requests for guidance may be sent to compliance@tectril.com.br. Suspected or actual violations may be reported through Tectril's Integrity Channel by an affected person, witness or third party.

Reports should, whenever possible, describe the facts, dates, locations, people involved and available evidence. A person does not need complete proof to make a good-faith report. Deliberately false or manipulated information violates this Policy.

Confidentiality will be preserved to the greatest extent possible, with information shared only with those who need it to handle the matter. Anonymity may be offered depending on the channel's structure and applicable legal and technical limits.

12. Investigation, measures and non-retaliation

Reports will be assessed independently, impartially and respectfully, with a presumption of good faith and an appropriate opportunity for those involved to respond. Protective measures may be adopted to prevent further harm, interference or retaliation without prejudging responsibility.

Confirmed violations may result in guidance, training, warning, suspension, dismissal, contract termination, reporting to authorities or other proportionate and lawful measures. Process improvements, preventive controls and remedial actions will also be considered where appropriate.

Retaliation is a separate violation and includes threats, isolation, embarrassment, unfair evaluation, loss of opportunity, punitive reassignment or any harm motivated by a good-faith report or cooperation. Suspected retaliation must be reported immediately.

13. Privacy and records

Personal and sensitive information relating to accommodations, health, identity, diversity, reports and investigations will be processed for legitimate purposes, according to necessity, restricted access, security and retention requirements consistent with law and Tectril policies.

Training, assessment, investigation and corrective-action records must be accurate, traceable and protected against unauthorized access, alteration or disclosure.

14. Training, monitoring and continuous improvement

Tectril will provide communications and training proportionate to risks and responsibilities. Leaders and functions exposed to specific risks may receive enhanced training.

The effectiveness of this Policy may be monitored through indicators, workplace perceptions, reports, investigation outcomes, corrective actions, training participation and third-party assessments. Results should support improvement without improperly exposing individuals.

15. Governance, exceptions and review

This Policy must be read together with the Code of Conduct, Compliance Policy, Anti-Corruption Policy, Privacy Policy and other applicable internal rules. In the event of conflict, applicable law and, where legally possible, the rule that affords more appropriate protection will prevail.

There are no exceptions for discrimination, harassment, violence, child labor, forced labor or retaliation. Questions about application must be submitted to Compliance before a decision is made.

The Policy will be reviewed periodically and whenever there is a material change in law, structure, risks or Tectril's operations. This version takes effect on the date stated in the document control.

16. References

Constitution of the Federative Republic of Brazil; Law No. 9,029/1995; Law No. 12,288/2010; Law No. 13,146/2015; Law No. 14,457/2022; applicable labor and data protection legislation.

Universal Declaration of Human Rights; International Covenants on Human Rights; United Nations Guiding Principles on Business and Human Rights; fundamental conventions of the International Labour Organization.

Respect for human dignity is an essential condition for working and doing business with Tectril.