	Corporate Policy	**Code:**	**VFA-DCO-POL007**
		Version:	**003**
	Vice President of Management & Finance	**Target audience:**	**Internal**
		Pages:	**Page 1 of 13**
	Supplier ESG Management Policy	**Created on:**	**Mar 1, 2021**
		Revised on:	**Dec 29, 2023**

TABLE OF CONTENTS

1. OBJECTIVE

Set guidelines, responsibilities and procedures that enable RD to map, monitor and develop its commercial partners, since the homologation of new companies, and continuing throughout their commercial relationship with RD, establishing criteria for activities related to Supplier ESG Governance.

2. REACH

The content of this policy is applicable and shall be followed by all those involved in the activities correlated to the company's commercial partners, respecting the guidelines of the RD Supplier Code of Ethics & Conduct and policies related to the Company's commercial relationships, governance and sustainability, including the companies that indirectly render services to RD (subcontractors).

3. REFERENCES

- RD Supplier Code of Ethics & Conduct
- Our Code - RD's Ethics & Conduct
- Integrity Program
- Anti-corruption, Anti-fraud, and Relations with Public Entities/Agencies Policy
- Conflict of Interests Policy + Conflict of Interest and PEP (Politically Exposed Person) Statement
- Supplier Criticality Matrix
- RD's Commitments for 2030
- Ethical Chat Channel Policy
- Supply Procurement Policy
- Sales Order
- Third-party Privacy Risk Management Policy
- Third-party Information Security Risk Management Policy
- Statement of Commitment - General Conditions
- Supplier Monitoring Prioritization Matrix

4. DEFINITIONS/GLOSSARY

- **SG:** Supplier Governance
- **Commercial partners:** any company that sells products and/or services to or through RD, including sellers and subcontractors
- **Supplier:** bidder who has a business relationship with RD (issues invoice of product/service to RD)
- **Subcontractor:** company to whom production and/or service is outsourced by the supplier
- **Outsourced workers:** people linked to suppliers performing activities in one or more of RD's premises (head office, offices, pharmacies and/or DCs)
- **ESG:** Environmental, Social and Governance
- **ESG Topics:** main environmental, social, governance and compliance topics mapped within RD's relationships with its suppliers, including, but not limited to, energy and water management, impacts on biodiversity, renewable resources, greenhouse gas emissions (GHG), waste, forced labour, child labour, sexual exploitation of children and adolescents, occupational health and safety, labour practices, compensation practices, business conduct, ecodesign, social inclusion, animal welfare, diversity and inclusion
- **Origami Management:** specialized consultancy in the social and environmental area that carried out RD supplier risk mapping

- **Rating:** term used to refer to suppliers' classification regarding social, environmental and compliance issues carried out by the Supplier Governance (SG) area
- **Onboarding:** process of registering new suppliers
- **Private Label Suppliers:** Suppliers that manufacture RD's brand products
- **Sellers:** companies that use RD's marketplace to sell their products
- **Intercompany:** RD group's companies and brands
- **VP:** Vice President
- **Critical category:** suppliers that show higher ESG-related risk
- **Non-critical category:** suppliers that show lower ESG-related risk
- **Special categories:** suppliers and/or service providers that are neither monitored by the Supplier Governance (SG) area nor go through the homologation process, such as: public agencies/entities, public utility companies, unions and syndicates, lessees, financial institutions and related parties
- **One-off category:** suppliers that sell products/services on a single occasion and do not fall under any of the categories above, consequently going through a simpler homologation process. Examples of one-off suppliers: software licenses, coffee break catering services, lecturers, rental of venues for events, rental of equipment for events, among others
- **Register**: supplier registration in the RD payment system (SAP) carried out by the Supplier Governance team following the homologation of the company by the same area
- **Homologation:** evaluation of new suppliers previously screened by the business areas regarding ESG topics
- **Monitoring:** observation of RD's suppliers regarding ESG topics
- **Audit:** RD supplier and subcontractors evaluation process (online, on-site or hybrid) regarding ESG topics. Audit can be performed by the RD team (SG area) or by a third-party company hired by the area
- **Follow-up**: audit of the action plan observation (initial, annual or follow-up audit), which can be online, on-site or hybrid
- **Development:** supplier adjustment and capacity-building process monitored by the SG area so that suppliers can reach the highest ESG levels expected by RD
- **Compliance**: It means to act according to an order, a set of rules or a request, that is, being aligned with the company's rules, with a set of internal measures and procedures, with the purpose of avoiding, identifying and remediating ethical wrongdoings and/or violations
- **Background check:** risk assessment through documentation, considering image, reputation and financial risks, carried out by outside partner through automatic consultation (of CNPJ or CPF) of certificates, restrictions, among other public information databases
- **Spend:** payment or amounts paid by RD to a business partner
- **B2B:** transactions made between companies (CNPJs)
- **B2C:** transactions made between people (CPF) and companies (CNPJs)
- **Supplier Monitoring Prioritization Matrix:** criteria (spend amount and spend frequency) taken into account to prioritize business partners in terms of the existence and format of monitoring by the Supplier Governance area
- **Big brands:** nationally and/or globally known companies with great exposure in their segment, therefore reducing RD's reputational risk in cases of media exposure due to brand value and/or financial independence from RD
- **Small brands:** companies that are little known in Brazil and/or outside their field of activity, having RD among its largest customers and revenues (greater dependence), thus raising RD's reputational and liability risk.

5. ROLES AND RESPONSIBILITIES

The section roles and responsibilities details the responsibilities of actors involved in the supplier homologation, monitoring and evaluation process, whether new suppliers (newcomers) or not.

Homologation, monitoring, audit and development of RD's suppliers - including Direct Procurement, Supplies, RD Private Labels and Marketplace in the critical, non-critical, special, sellers and one-off categories - are exclusively performed by the SG area regarding ESG topics, whereas the topics related to the Brazilian General Data Protection Law ('LGPD' - Federal Law no. 13.709/2018) shall be addressed by the Privacy and Information Security Governance area, thus avoiding overlapping of actions. The Privacy and Information Security Governance area shall check whether RD's suppliers adopt technical, security and organizational measures able to ensure an appropriate level of protection to personal data and sensitive personal data they process, as well as whether or not they have a privacy governance program compatible with the risk of their respective activities.

6. GUIDELINES

The hiring of any business partner (supplier, service provider, outsourced worker or seller), regardless of the amount agreed (including amounts below R$ 100,000.00), **shall take place by following the homologation process carried out by the Supplier Governance area**, which shall strictly comply with the premises and rules set forth in this policy (ANNEX 1).

All internal areas of the Company, mainly Procurement (Direct, RD Private Labels, Supplies), Events, Expansion, Assets, Logistics, Marketplace, besides the support areas, shall adjust their internal procedures so that before any business partner is selected and/or hired in the bidding processes, such bidders are introduced to and go through classification and evaluation by the Supplier Governance area.

RD's active suppliers shall go through evaluation according to the criticality criterion defined in item 7.3 - (Monitoring) hereof.

SG area's main purposes and exclusive duties are to (A) **formalize**, (B) **homologate according to policies**, (C) **qualify** and (D) **protect** RD's business partners **legally and financially** regarding ESG (Environmental, Social and Governance) topics, delivering as values: **reputational safety**, strengthened **relationship with the supply chain** and **increase in the number of new businesses.**

6.1. Process deviation

Cases of hiring, registration or payment of business partners without previous homologation by the SG area shall be formalized according to the following stages:

- **Officer of the requesting area:** formalization by email to the Administrative and Financial Vice President and Supplier Governance managers of a request for permission not to follow the business partner homologation process, with an appropriate justification, when applicable, informing the CNPJ and corporate name of the companies that will not be previously subject to such processes.
- **Administrative and Financial Vice President:** formalization, in an answer to the email sent in the previous stage, of permission or denial of permission.
- **Permission granted:** business partner shall be mapped and registered in the supplier governance system (Sym Supply), and classified according to the risk identified. The permission request shall be attached to the referred system. In case the partnership continues, supplier shall carry out all the

homologation stages, lest the company be blocked.
- **Permission denied**: business partner shall neither be registered nor receive payments from RD.

All cases of registration without previous homologation by the Supplier Governance (SG) area shall be statistically measured and monthly reported to the Controllership Officer and to the Vice President of Management & Finance.

6.2. Risk Classification of business partners

The risk classification process of RD's business partners, carried out by the Supplier Governance area, was inspired by ISO 20400 - Sustainable Procurement, and draws on RD Supply Chain's Social and Environmental Risk Matrix.

For this end, an initial evaluation to segment the company's entire supplier database was carried out, as well as an analysis of procurement categories under a social and environmental perspective. Supplier risk classification was made taking into account two axes: level of severity and likelihood of social and environmental impact to materialize (defined by its macro category), and RD's co-responsibility level (considering the degree of impact deriving from the existence of a business relationship).

Based on this classification, sustainable procurement management processes are applied to each risk level. Based on this analysis, the Supplier Governance area has drawn a plan, according to the prioritization matrix (item 6.3), whose initial scope is to monitor business partners that fall into the 'Critical' category. However, according to the situations identified or not by the SG area, the scope may be expanded to mitigate the reputational risk for RD's private labels, the risk for people and/or for the environment.

After validation by the Sustainability team and by the Origami Management consultancy, the following activities were considered as critical categories:

- Customized products (products that carry an RD logo);
- Companies that manufacture and sell directly to RD;
- Companies that manage and/or transport waste

In this way, activities classified as critical categories, i.e. with the greatest risk of generating a negative impact on social, environmental and compliance issues include business partners that:

- Produce RD private labels
- Manufacture customized products that carry an RD logo
- Make use of outsourced workers in one or more of RD's premises
- Have a production process in place (manufacture **AND** sell directly to RD)
- Perform maintenance/repair services
- Perform engineering and/or renovation works
- Provide waste management services (treatment and/or transport)
- Provide transport (products or people)
- Provide B2B and/or B2C distribution services
- Negotiate with government officials
- Share or access RD's personal data (in this case, the Privacy and Information Security Governance Office is called in to deal with the matter)

In addition to the above categories, the SG area also maps and monitors sellers, but following a more basic protocol.

6.3. Monitoring Prioritization Matrix

The process of monitoring business partners in critical categories, classified in item 6.2 of this policy, will consider each company's **score**, made up of two variables, each with its own weight: **spend amount** and **spend frequency**, prioritizing the monitoring of companies with a score of 3 to 5 on the matrix scale.

Levels of spend amount/year (60% weight)	Spend classification	Weight in the matrix
No spend	Inexistent	1
Up to 100k	Very low	
100 – 500k	Low	2
500k – 1m		
1 – 10m	Average	3
10 – 50m		
50 – 250m	High	4
250 – 500m		
Above 500m	Very High	5

Spend frequency/year (40% weight)	Frequency classification	Weight in the matrix
0	Inexistent	1
1	Low	2
2		
3		
4	Average	3
5		
6		
7	High	4
8		
9		
10	Very High	5
11		
12		

Business partners who do not meet the above criteria will be monitored by background check without the need for implementation and observation of an action plan. The most critical cases can be flagged by the SG area.

Each and every business partner will have its monitoring process terminated when its status in SAP and Sym Supply is **blocked.** Consequently, this company will not be taken into account by any observation measurement indicators, including corporate targets, projects and/or internal and/or external indicators.

7. PROCESSES

7.1. Homologation: Register

We stress that the register of new business partners without the Supplier Governance's homologation shall follow item 6.1 of this policy.

The approval of register of new business partners (suppliers and/or sellers) shall be carried out by the SG team, according to the risk classification and the following criteria:

A, B or C Rating: automatic approval (SG), because in these cases there are no violations classified as extremely serious and/or serious, thus decreasing the reputational risk for RD and/or RD's private labels, the risk for people and/or for the environment.

D Rating: approval shall depend on the coordinator or manager (SG) because, in this case, too many violations and/or serious violations were identified, thus increasing the reputational risk for RD and/or RD's private labels, the risk for people and/or for the environment.

E Rating: approval shall depend on the coordinator, manager or officer of the SG area because, in this case, too many violations and/or extremely serious violations were identified, thus increasing the reputational risk for RD and/or RD's private labels, the risk for people and/or for the environment.

In cases of a D or E rating, the Supplier Governance team will upload the evidence of approval to the Sym

Supply system, guaranteeing the traceability of the case.

Business partners shall accept Our Code - RD's Ethics & Conduct, the Compliance Policies (Anti-corruption, Anti-fraud, and Relations with Public Entities/Agencies, among others), and the Data Security and Privacy Agreement as well as make a statement on potential Conflict of Interest and PEP (Politically Exposed Person), in accordance with the RD Integrity Program. New partners shall also attend the Welcome to RD training.

The opinion regarding the final analysis of the evaluation of the business partner by the SG area (SLA) will be issued **within 7 calendar days** from the moment of the request made by the business areas, through Service Now, provided that the SG area has the minimum information necessary to issue the opinion **and, above all, that the business partner successfully completes the stages that are its responsibility.**

At the time of registration, all business partners shall inform (through the Integrity Questionnaire) whether or not they will use subcontractors and/or branches to manufacture products for RD or RD Private Labels, or to provide services; if so, they shall enter the list of subcontractors used, as they will be included in the SG monitoring process.

The SG team will carry out the ESG risk classification of business partners by means of a questionnaire (according to item 6.2 of this policy). The homologation process shall also include the evaluation of LGPD and Data Security and Privacy topics, carried out by the responsible team.

The business partner shall send the full documentation for analysis and homologation by the SG area **within 30 calendar days**, otherwise the process shall be cancelled by the SG team and communicated to the requesting area, and its resumption will return to the initial stage.

7.2. Tools

The SG area uses the following tools to carry out its processes:

- Sym Supply: performance of the complete supplier governance process;
- Automatic risk assessment system (background check - CNPJ or CPF queries);
- Service Now: ticket (request) for registration of new suppliers by the business areas
- SAP: database of all suppliers who have or have not been paid a spend
- Ariba: Supply system

7.3. Monitoring

The process of monitoring and managing action plans in relation to RD's business partners will consider the base year prior to the current year, and efforts will be focused on the suppliers with the highest scores in the prioritization matrix (according to item 6.3).

Table with the requirements for the commitments that the RD's business partners will have to make:

All categories	Sym Supply	Risk Classification	Risk Assessment (Rating)	SG Audit	Action Plan	Onboarding Training	Purchase Agreement	Signed Agreement	Code of Ethics & Conduct	Anti-corruption Policy	Conflict of Interest and Public Entities / Agencies Policy	PEPs Statement	Integrity Questionnaire	Related Parties	Security and Privacy Agreement	ESG Questionnaire	Climate Change
Critical	✓	✓	✓	✓	✓	✓	!	!	✓	✓	✓	✓	✓	✓	!	✓	!
Sub*	✓	✓	!	!	✓	!	!	X	!	!	!	!	!	!	!	!	!
Sellers**	✓	✓	✓	!	!	!	X	✓	!	X	X	X	X	✓	X	X	X
Non-critical	✓	✓	✓	!	!	!	!	!	✓	✓	✓	✓	✓	✓	!	!	X
Observation***	✓	✓	✓	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Special	✓	✓	✓	X	X	X	X	X	X	X	X	X	X	X	X	X	X

ü *Fully applicable* ! *Partially applicable* X *Not applicable*

* Subs (Subcontractors or Branches): companies declared by suppliers as responsible for part of the production process
** Sellers: are not in the critical category, but are monitored following a more basic protocol
*** Observation (proposal to be validated by Legal, Supply, among other areas): Startups, Influencers, Software licences, Imported products, etc.

Business partners who do not meet the above criteria will be monitored through background check without the need for implementation and observation of an action plan; however, the most critical cases can be flagged by the SG area.

Each and every business partner will have its monitoring process terminated when its status in SAP and Sym Supply is **blocked.** Consequently, this company will not be taken into account by any observation measurement indicators, including corporate targets, projects and/or internal and/or external indicators.

7.3.1 Evaluation

Three different business partner ESG-focused evaluation formats shall be applied, as described below:

Background check: risk assessment carried out by SG through market tools by consulting the company's CNPJ (regulatory scanning of public data), or when necessary, consulting CPFs (corporate structure);

Self-evaluation: the business partner answers the specific questionnaires, such as the Integrity Questionnaire, the ESG Questionnaire and other segment-specific questionnaires.

Business partners audit: carried out by the SG team, or by a company appointed by RD, which can be on-site, online or hybrid (on-site + online). Audits may be announced, semi-announced or unannounced.

In order to bring greater dynamism and lower operating costs, without compromising the quality of the process, follow-ups on the audit action plan can be carried out by analysts and remotely, as long as the evidence is documentary and/or of low complexity (e.g. AVCB - Fire Department Inspection Certificate, other licences, photos of fire extinguishers, photos of electrical installations, etc.) and always validated by the auditor who carried out the previous visit.

We have defined the following criteria for prioritizing monitoring and carrying out on-site audits:

- Critical category
- Follow-up deadline
- Score from 3 to 5 points in the prioritization matrix
- Customized products
- RD Private Labels
- Higher Risk activities
- Subcontractors
- Small brands
- Direct: industry and distributors (captive and non-captive)

- Construction audits (new pharmacies, new Distribution Centres and new offices or RD construction works
- Renovations (pharmacies, Distribution Centres and offices or RD construction works)
- Big brands: will be assessed exclusively through background check, and on-site audits will be carried out on an one-off basis, depending on the decision of SG or as previously agreed with the Controllership Officer.

RD's SG team audits the construction and renovation of pharmacies, Distribution Centres and offices, exclusively on site. Audits may be announced, semi-announced or unannounced.

RD may, through its SG area, or another department it may define, request that its business partners present specific certifications addressing ESG topics or those related to their segment.

In the process of monitoring RD's business partners, tools are used for evaluation and scoring, whether through background check, self-evaluation and/or audit. Each question has a criticality (weight) level, namely: **Extremely Serious**, **Serious**, **Relatively Serious**, **Less Serious** and **Least Serious**.

The company's **rating** is generated based on two variables: 1. Number of violations and 2. Criticality level of each question that brought about the non-conformity, according to the table below:

Rating	# Extremely Serious	# Serious	# Relatively Serious	# Less Serious	# Least Serious
A	0	0	0	0	0 - 5
B	0	0	0	1 - 7	6 - 9
C	0	0	1 - 4	8 - 13	10 +
D	0	1 - 3	5 - 7	14 +	-
E	1 +	4 +	8 +	-	-

7.3.2 Monitoring cycles

The companies' rating shall determine the monitoring frequency/cycle to be carried out by the SG area, both regarding the online evaluation (background check) and the audits, as shown in the table below:

Rating/Cycles	Background check (assessment through documentation)	Audit* (assessment through documentation and on-site assessment)
A or B	Every 12 months	Within 24 months
C	Every 6 months	Within 12 months
D	Every 3 months	Within 6 months
E	Every 3 months	Within 3 months

* On-site audit cycles can vary by 2 months (+ or -), depending on logistical factors, travel funds, etc.

The SG area has the autonomy to make adjustments to the monitoring cycles, regarding deadlines and/or items to be checked, without the specific need to update, validate and republish this policy, with a view to mitigating risk and improving operational efficiency.

The on-site observation of action plans for expansion and renovation audits will depend on the stage the work is at and/or on the severity of the previously identified non-conformity, given that the focus in this case will be preventing recurrence of the problem in future works, since the period of a work may be shorter than the period of the evaluation and follow-up cycle. In any case, the observation of the action plan through the system shall be carried out according to the deadlines in the table above.

The homologation/qualification of business partners has no expiration date. Therefore, once qualified, the business partner will be able to supply products and/or services to RD, with the exception of the deadlines for background checks and audits (depending on the rating), recurring D or E ratings (item 7.2.2.1) or in specific cases reported by the business areas and/or the Legal department.

7.3.3 Recurring D or E rating

RD, through the SG area, shall seek continuous improvement of its business partners regarding social, environmental and compliance practices; therefore, recurring D or E rating shall be monitored and reported for the following reasons: they may bring negative impacts on business relations, low performance may compromise the engagement of companies with better evaluation results, and the risk to the business and to brand reputation may increase.

Therefore, companies being rated D or E four times in the period of 24 months, whether on a continuous basis or not, regardless of the type of evaluation (background check, and/or audit), **may have new sales orders suspended for 12 months**.

7.3.4 Company status

The SG area has autonomy to monitor and request changes in the supplier status after evaluations.

The status are as follows:

Regular - when there is no business impact between RD and its business partners;

Suspended - when RD receives products and/or makes payments to business partners, but issuance of new orders is not possible. Suspension can occur in two ways:

1. Automatic - according to the rules of ESG issues monitoring defined by the SG team

2. Manual - carried out by the SG area or requested by the business areas, by suppliers or even by the Legal and Compliance department.

Blocked - when issuance of new orders and/or receiving products and services are not possible. Suppliers can be blocked in two ways:

1. Automatic - according to the rules of ESG issues monitoring defined by the SG team

2. Manual - carried out by the SG area or requested by the business areas, by suppliers or even by the Legal and Compliance department.

With the aim of making RD's supply chain leaner, more efficient, with less risk and with a reduction in monitoring costs, the SG area will evaluate the history of financial transactions between business partners

and RD itself every year at the start of each new accounting year (January), proposing to block companies with an entry date of 12 months or more **and** with no payments (spend) in the previous 12 months The reactivation of business partners blocked by this condition will require a new homologation process, following the risk classification of each company.

Restricted - when the business partner, by a joint decision of the GF area with the business and/or Legal and Compliance areas, is blocked from current and future negotiations. Permanent blockage.
Warning: only the Vice President of Management & Finance and the VP of the area that wants to hire the blocked supplier may approve the change in this status, after formalization (by email).

7.3.5 Outsourced Workers Management

With the aim of mitigating labour, social security and institutional image risks related to our business partners, the GF area, together with the business areas, also monitors outsourced workers allocated to RD units.

7.3.6 CNAE Evaluation

The company's CNAE (National Classification of Economic Activities) evaluation shall be based on products sold and/or services rendered to RD, considering primarily the CNAE of the CNPJ (Corporate Taxpayer Register Number), which will not necessarily be the one of supplier's head office. The responsibility for reporting changes in the scope of the service provided or product supplied lies with the contracting area, as changes in scope may affect the risk classification and, consequently, the monitoring format carried out by GF.

8. DEVELOPMENT

One of the pillars of the GF area's work is attention to the development of business partners, always in an advisory capacity, supporting them in continuous improvement, aiming for the best performance in social, environmental and compliance aspects, represented by the A or B rating.

The SG area shall lead the communication with business partners after the evaluations. More details on this and other SG processes can be found in the Supplier Governance Manual and in the RD Supplier Code of Ethics & Conduct.

As mentioned in item 7.3.3 herein, it is important to stress that companies with recurring D or E rating within 24 months, whether on a continuous basis or not, as of the date of evaluation (background check, self-evaluation or audit), may have new orders suspended for 12 months.

9. CANAL CONVERSA ÉTICA (ANONYMOUS ETHICS HOTLINE)

RD makes available the Anonymous Ethics Hotline as a whistleblowing tool to report misconduct and/or wrongdoing that violates RD's policies, the Legislation and the RD Supplier Code of Ethics & Conduct. It can be accessed 24/7.

In the event of any situation that may qualify as the violations described, the employee, supplier, partner, service provider, customer and others may file a report through the following communication channels:
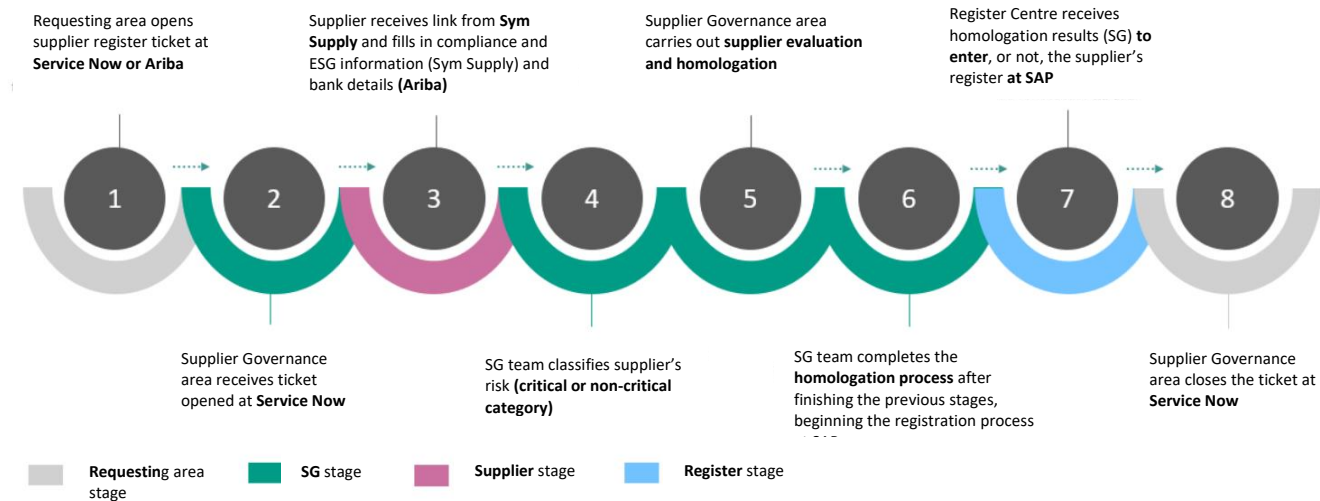Website: www.conversaetica.com.br
Email: contato@conversaetica.com.br
Telephone: 0800 778 9009

It is a confidential and independent channel, supported by a third-party company that receives the wrongdoing reports, guarantees anonymity and information confidentiality. An employee reporting a wrongdoing shall not be subject to any threat, intimidation or retaliation.

10. SUPPLIER HOMOLOGATION REQUEST FLOW

Requesting area opens supplier register ticket at **Service Now or Ariba**

Supplier receives link from **Sym Supply** and fills in compliance and ESG information (Sym Supply) and bank details **(Ariba)**

Supplier Governance area carries out **supplier evaluation and homologation**

Register Centre receives homologation results (SG) **to enter**, or not, the supplier's register **at SAP**

Supplier Governance area receives ticket opened at **Service Now**

SG team classifies supplier's risk **(critical or non-critical category)**

SG team completes the **homologation process** after finishing the previous stages, beginning the registration process

Supplier Governance area closes the ticket at **Service Now**

Requesting area stage   **SG** stage   **Supplier** stage   **Register** stage

11. ANNEX

Special categories

Due to their supply nature and/or exclusivity in their service/product provision (when there is no other competitor), the suppliers and/or service providers below are classified as 'special categories' and, therefore, shall be evaluated differently from other business partners:
- Donations to institutions;
- Public Entities/Agencies;
- Public utility companies;
- RD's employees;
- Natural persons for refund purposes;
- Natural persons or companies for judicial settlement payment purposes;
- Unions and syndicates;
- Lessees;
- Insurance;
- Educational institutions;
- Financial institutions; and
- Companies for intercompany purposes and related-parties.
- Politically Exposed Person (PEP):

Warning: the above list of activities classified as 'Special' is not exhaustive and may change as new companies and new segments register having this characteristic.

12.   AUTHORITY

Action / Reason	Person in charge	Approval
Development of policy on the concepts and rules of the supplier monitoring and homologation process	Supplier Governance Manager (SG)	Controllership Officer and/or Vice President of Management & Finance

13.   RECORD

Version	Created/modified on	Date of approval	Access	Maintenance and update	Storage
001	Mar 1, 2022	Apr 21, 2021	Corporate	Controllership Officer	Work Place
002	Feb 16, 2022	Feb 23, 2022	Corporate	Controllership Officer	Work Place
003	Dec 29, 2023	Jan 4, 2024	Corporate	Controllership Officer	Work Place