



Code of Conduct

RAR AÇÚCAR

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Presentation

WE ARE a sugar refining and marketing company with exclusively national capital.

We were born in Oporto, in 1962, from the concentration of nine small sugar refining units in the northern region.

The concentration of activity in a single production unit and successive investments in technology have allowed us a significant increase in production capacity and remarkable efficiency gains.

With an installed production capacity of 250,000 tons/year, we market various types of sugar produced from sugarcane, with different uses and purposes for various market segments, namely industry and distribution. Focused on satisfying those who consume our sugar, we value the difference in consumer needs, sensitivities, and expectations, holding a portfolio of differentiated products, with Kosher, Halal, Organic, and Vegan certification.

Consistently, we have an Integrated Management System for Environment, Quality, Food Safety, and Workplace Safety and were the first Iberian company in the sugar sector to obtain the International Food Standard (IFS Food) Certification. We are also certified by ISO 9001 and ISO 14001.

Today we are part of the RAR Group, which integrates a diverse set of businesses in various geographies, distributed across the Food, Packaging, and Real Estate areas, whose management is coordinated by RAR - Sociedade de Controlo (Holding), S.A. We assume as an ethical business imperative our commitment to excellence in the quality and safety of our products, in social and environmental responsibility, and in the safety and well-being of our workers, always complying with the highest ethical and legal standards.



Scope

The RAR Açúcar Code of Conduct establishes a set of principles and rules regarding ethics and professional behavior, to be observed by employees, suppliers, shareholders, and partners in the exercise of their functions, and in their relationships with each other and with third parties.



Objective

COMPLYING with the RAR Açúcar Code of Conduct is essential to ensure that all actions and decisions of employees, suppliers, service providers, and shareholders are aligned with the fundamental principles of the organization. Within each pillar of the RAR Açúcar Policy, the principles of this Code of Conduct are elucidated. Taking this premise into account, RAR Açúcar requires that all stakeholders proceed in accordance with the principles of this Code of Conduct and with all applicable laws, regulations, and codes. These principles must be communicated to all personnel and implemented as part of a day-to-day management process. Records of compliance with the requirements must be maintained and be available for verification upon request.

Compliance with the code of conduct is essential to maintain the trust that our employees, clients, and partners place in us!



Organizational and Commercial Strategy

COMPLIANCE WITH APPLICABLE LEGISLATION – RAR Açúcar expects all its employees, including suppliers, to comply with applicable legislation and regulations. Legislation applicable in the country where operations take place must be fully respected. When the provisions of this Code of Conduct are more stringent than the Law, this Code must be fully complied with.

CORPORATE ETHICS AND CORRUPTION PREVENTION – The fight against any form of active or passive corruption must be carried out by all who collaborate with this company. Employees, partners, shareholders, and suppliers must not engage in acts of bribery, corruption, extortion, or misappropriation of funds or that may violate applicable anti-corruption laws. It is also necessary to pay special attention to any form of payments, favors, and complicity that may create situations of illicit advantages, which constitute subtle forms of corruption, such as offers or receipts from clients or suppliers.

TRANSPARENCY – RAR Açúcar values transparency in all its operations and expects the same from its suppliers and other stakeholders. This includes clear and regular communication about their social responsibility practices and the impact of their activities on society.

COMMUNICATION BETWEEN EMPLOYEES AND THIRD PARTIES – All employees and third parties collaborating with RAR Açúcar, regardless of their hierarchical position, must adopt a responsible, respectful, cooperative, and courteous personal approach, guided by the ethical principles and values shared by this company. In their professional relationships, employees and third parties collaborating with RAR Açúcar, particularly all our suppliers, must promote active information exchange, cooperation, and foster team spirit, and must implement and communicate policies, procedures, and processes clearly with their employees.

CONFLICT OF INTEREST – RAR Açúcar avoids interactions that may interfere with or cause conflicts of interest in the way the worker or workers in question act. Suppliers must disclose any personal relationships established between their workers and RAR Açúcar workers.

FAIR COMPETITION – RAR Açúcar assumes full compliance with legislation related to competition applicable to its activity, in order to promote free and fair competition, ensuring that companies exercise it by offering competitive prices, innovative products, and better services without interfering with market supply and demand forces, and its suppliers and other stakeholders should assume the same commitment.



Quality and Customer Focus

PROMOTION OF PRODUCT QUALITY AND SAFETY – The pursuit of excellence is constant and integrates all stages of production, from raw material acquisition to final customer delivery. By "quality standards" are understood the Specifications that concern product characterization and controls, procedures, and established rules that, in some way, have an influence on the quality and/or legality of products and services available to our clients. Moreover, RAR Açúcar seeks continuous improvement and customer orientation through constant review of our products and services in order to innovate and offer results that exceed market expectations. RAR Açúcar's suppliers must respect the rules relating to composition, labeling, packaging, manufacturing and production technology and procedures in force in the country where their products are marketed, as well as the existing codes of good practices in each sector.



Food Safety

PROMOTION OF PUBLIC HEALTH AND FOOD SAFETY CULTURE – RAR Açúcar establishes and determines compliance with food safety and authenticity "standards" by its employees and suppliers and recognizes the importance of adopting rigorous, controlled, and responsible practices throughout the production chain to obtain safe and authentic products for human consumption and in accordance with legislation, internal specifications, contracts, agreements, or reference documentation. Furthermore, it promotes the sharing of values, beliefs, and behaviors that extend to all levels in the RAR Açúcar organization, obtaining a robust Food Safety Culture. Suppliers must ensure that all their products have been designed, manufactured, and tested in accordance with the highest quality and safety standards, with the aim of ensuring that they do not have defects likely to harm the life, health, and physical integrity of consumers. It is intended that suppliers and all stakeholders assume the same commitment to developing a Food Safety Culture, reinforcing public health protection, mitigating the risk of foodborne diseases, and maximizing the confidence of our consumers



Environmental Protection and Sustainability

SUSTAINABLE DEVELOPMENT – Through sustainable development objectives, RAR Açúcar continuously focuses on: decent work and economic growth; sustainable production and consumption; renewable and accessible energy. These objectives ensure that economic growth meets the needs of current generations without compromising resources for future generations, and the same is expected of its suppliers. We encourage the adoption of practices that minimize environmental, social, and economic impacts, and that take into account ethical standards, social responsibility, and corporate governance with the aim of RAR Açúcar's sustainability. We request our suppliers to actively seek to improve their management system based on sustainable development goals.

PROMOTION OF ENVIRONMENTAL PROTECTION – We are committed to reducing the environmental impact of operations and preventing pollution, namely through effective management of energy and water, effective waste and atmospheric emissions management, as well as reduction of greenhouse gases. Our suppliers must also be responsible for managing, evaluating, and minimizing the environmental impact associated with their activities and in compliance with legislation in force in the country in question, with pillars of responsible consumption of energy and water resources, waste management, and atmospheric emissions.



Ethical and Safe Labor Practices

RESPECT FOR HUMAN RIGHTS – RAR Açúcar, its employees, suppliers, and all who cooperate with this company must respect all legal and regulatory standards applicable to the company's activity, and must be aligned with international standards, such as compliance with ILO (International Labor Organization) Conventions, the Universal Declaration of Human Rights, and United Nations (UN) Conventions regarding children's rights, and therefore no acts that violate any legal principle can be practiced.

PROHIBITION OF FORCED AND CHILD LABOR – We strictly follow international conventions that prohibit forced labor, trafficking and exploitation of human beings, slavery, and child labor. It is our duty and that of our suppliers and partners that employment be a free choice, with the ability to freely leave the employment relationship (after prior notice) without fear of retaliation, entirely voluntary and with appropriate conditions, and that workers are legally authorized to work at the location and in the facilities. Suppliers and service providers are equally responsible for assessing their eligibility and ensuring that they do not resort to child labor in the production and/or distribution of goods or services and never withhold any identification document, passport, or work permit from their workers.

WORKING HOURS – RAR Açúcar guarantees workers a work schedule with a maximum number of hours and working days, rest time, and vacation in accordance with applicable legislation and regulations. Supplementary work should be performed voluntarily whenever possible and will not be required as a standard. RAR Açúcar expects its suppliers and partners to assume the same commitment.

FAIR, DIGNIFIED, AND TRANSPARENT WORK COMPENSATION – RAR Açúcar complies with the payment of wages and other remuneration obligations for work performed and provides written and comprehensible information about remuneration and working time, and expects its suppliers to assume this commitment. Salary and/or benefit deductions as a disciplinary measure are not permitted outside the exceptional cases provided for in Labor Law.

FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING – We respect the right of our employees to form unions or other forms of labor representation and to participate freely in collective negotiations, ensuring open dialogue and worker participation in decisions that affect their working conditions, without fear of harassment, intimidation, or retaliation. Our partners and suppliers must recognize this right for their workers.

PROMOTION OF INCLUSION, DIVERSITY, AND EQUITY – We are committed to ensuring that all workers and collaborators in their supply chains are treated with dignity, respect, and fairness. RAR Açúcar adopts policies against any form of discrimination, whether based on gender, race, social class, religion, sexual orientation, pregnancy, age, disability, or any other factor, and therefore guarantees hiring and employment practices based on the individual's ability to do the work. Equal opportunities are an essential value for RAR Açúcar, which adopts an active stance in combating gender inequality and promotes cultural diversity at all levels of the organization. The organization fosters equal opportunities for professional development, regardless of individual differences. All partners and suppliers must ensure compliance with these principles.

PROHIBITION OF HARASSMENT AND VIOLENCE – We do not tolerate any form of harassment, whether moral, sexual, or psychological. RAR Açúcar promotes a safe environment where employees feel respected and valued, with confidential channels for reporting any inappropriate behavior, and expects the same from its suppliers and partners.

PROMOTION OF WORKPLACE SAFETY AND HEALTH – There is a commitment to providing a healthy and safe work environment that promotes both the physical and mental well-being of employees. This includes living conditions fully compliant with current legislation and industry-accepted standards. To this end, the company ensures a health support structure for employees and the provision of individual and collective protection equipment (PPE) so that they can perform their duties safely. RAR Açúcar trains its employees in safety procedures and how to act in case of emergency, promoting a culture of safety, prevention, and shared responsibility. All suppliers and partners must guarantee their workers safety and health conditions within the same principles, training on how to act in emergencies, and promote the well-being of their employees through support structures.

INTELLECTUAL PROPERTY AND INFORMATION CONFIDENTIALITY – We assume privacy and confidentiality as fundamental rights. RAR Açúcar adopts rigorous technical and organizational measures to ensure the security of personal data being processed, and its partners and suppliers must ensure the confidentiality of all intellectual and reserved property owned by RAR Açúcar, such as any commercial, operational, or other information associated with RAR Açúcar or third-party products.



Final Considerations

“We have a history spanning more than 60 years, which we embrace as a testament to rigor, quality, and integrity, recognized by employees, suppliers, clients, and the surrounding community, but also as a constant demand and challenge for coherence and self-improvement.”

Miguel Geraldés, CEO



Acceptance

I hereby acknowledge and agree to the present Code of Conduct and commit to communicating and disseminating this Code of Conduct within my organization, ensuring that the same principles are applied and respected throughout its supply chains.

I return this document duly signed and stamped.

Company:

Address:

Name:

Position:

Signature and stamp:

Place:

Date:

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