

# VC COMPLIANCE PROGRAM


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Following the laws  
and regulations is not  
only great for you,  
but for everyone else.



# VC COMPLIANCE PROGRAM



Dear Colleague,

It is with great satisfaction that I am sharing this VC Compliance Program document with you. Based on our Code of Conduct, Values and Beliefs, the main objectives of our Compliance Program are to:

- Reinforce Votorantim's control environment and promote continuous compliance management;
- Ensure compliance with laws and regulations through the implementation of the Compliance Program;
- Ensure conformity of our commitments in contracts and agreements;
- Guide the processes for obtaining the permits and certificates necessary to our operations;
- Ensure a high quality for all external reporting;
- Demonstrate our commitment with anti-trust, anti-corruption and fraud prevention;

This Program is part of the new value creation cycle for Votorantim Cimentos, which seeks to promote a global strategic alignment by integrating policies and implementing best practices throughout the organization. This journey began with the creation of the movement "One Team, One Company" in 2013, with the objective to implement global governance processes and seek greater integration and synergy among all businesses units and countries where VC operates.

All these changes have been steered by our vision, the strategic driver that guided our actions since 2014. We want to be the construction materials company committed to customer success through excellence, based on four pillars: customer focus, people with autonomy, operational excellence and sustainable practices.

**It is up to each of us at all times to comply and act according to VC's ethical standards of conduct.**

The Compliance team will support us in: managing conformity to regulations, enhancing processes and policies, developing training programs, strengthening communication channels, and evolving the surveillance of all these issues.

I count on your commitment to implement and ensure adherence to the compliance guidelines contained in the following material.



Regards,

**Walter Dissinger**

Chief Executive Officer



**Votorantim**  
Cimentos



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## OUR COMMITMENT

Votorantim Cimentos complies with all laws relating to its businesses and maintains an ethical commitment in carrying out each of its activities. Our goal is to maintain a responsible business and ethical conduct in any circumstance.

The same commitment is required of us all, employees and partners. Thus it is very important that everyone understands that Votorantim Cimentos does not tolerate misconduct or non-compliance with legal obligations and internal norms.

Remember that our Code of Conduct, which is inspired by the Votorantim management values and beliefs, must always be respected in your day-to-day actions and decisions, and should serve as a reference for our partners.

Based on these principles, you must reject or withdraw from a business whenever any unethical or illegal situation is encountered.

**Votorantim Cimentos is committed to conducting its businesses with integrity and based on the highest ethical standards.**



## What does Compliance means?

The word compliance comes from the English verb 'to comply', meaning 'to fulfil an obligation'. It is widely understood and used by companies and governments around the world in this context.

Compliance is the action or fact of being in accordance with established rules and norms which all involved individuals must obey. Thus, one can say that compliance means upholding all the laws, internal regulations and norms within VC's corporate culture, Values and Beliefs, and the Code of Conduct.



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## OUR COMPLIANCE PROGRAM

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Votorantim Cimentos has created a Global Compliance department whose primary responsibility is to ensure that the Program is applied throughout the firm, and gives the necessary support to the business areas so that they act in accordance with the laws and regulations, thus carrying out their activities ethically and with integrity.



### What is the VC's Compliance Program?

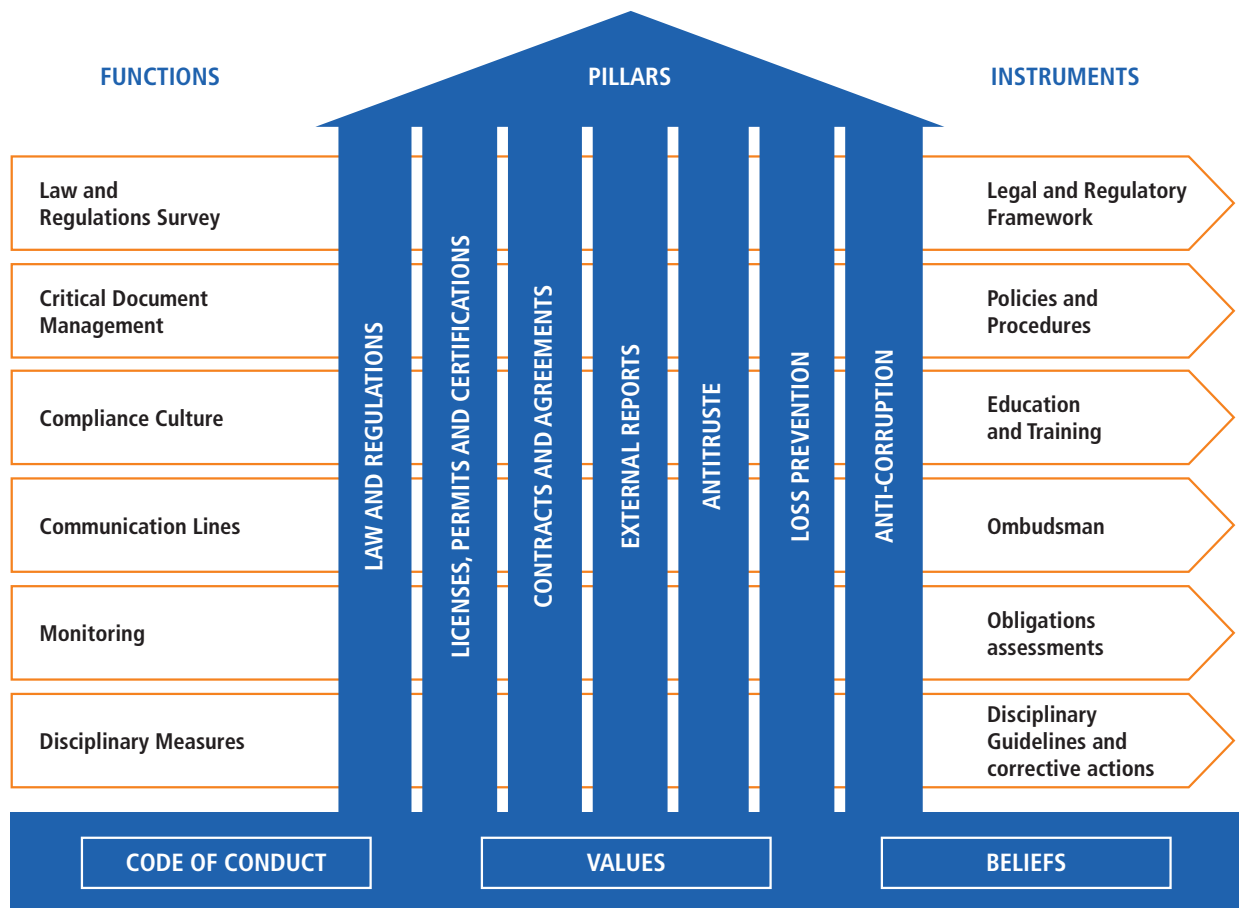
The program brings together the Compliance functions while defining the main departmental topics.

**The program's activities are carried out by different departments with the support and supervision of the Compliance division**, which operates together with the; Legal, Risk Management, Internal Controls, People & Management, Internal Audit and the Ombudsman departments.

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## OUR COMPLIANCE PROGRAM



The Pillars of the Compliance Program serve to guide all employees in the search for conformity. They represent important issues for Votorantim Cimentos and receive specific attention of our leaders, who must conduct their teams to guarantee:

- Compliance with Laws and Regulations and commitments in signed contracts and agreements;
- Obtaining licenses, permits, and certifications necessary for our operations;
- The high quality for all external reporting;
- The adherence to anti-trust regulations, anti-corruption law, and the prevention of fraud.

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## OUR ANTI-CORRUPTION PROGRAM

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Votorantim Cimentos has no tolerance for any corrupt practices and encourages all employees, executives, and agents to report any suspected violation.

We have a Global Anti-Corruption Policy which should be the foundation of our business, so that each activity is conducted with the highest integrity. The Legal department is the guardian of this policy and should always be consulted if in doubt.

Our Anti-Corruption Program was developed and divided into six major areas following Brazilian and US authorities' best practices and guidelines.

**Votorantim Cimentos conducts its business with the highest integrity and expects the same commitment of all employees and partners.**





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## OUR ANTI-CORRUPTION PROGRAM



### Training Courses

You will receive periodical training to understand, update, and clarify any doubts related to anti-corruption practices at Votorantim Cimentos. Whenever there is training available for your area,

we encourage you to participate actively so that you may fully understand to put this knowledge into practice. Remember: Compliant with anti-corruption practices is everyone's duty.

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## WHAT IS EXPECTED FROM YOU?

Each employee is responsible in **ensuring compliance with all the obligations associated with the activities** of his or her position, including the identification, management and reporting of any compliance violations.

All employees must be familiar with, and **obey the laws and internal regulations** in their work at Votorantim Cimentos. Ignorance of an obligation is no defense against the possible repercussions of misconduct.

Votorantim Cimentos employees **must set a good example** and take steps to ensure that others perform their activities in an ethical way in accordance with the legal and regulatory requirements;

It is the duty of every Votorantim Cimentos employee to be **familiar with the company's Code of Conduct**. Employees must participate in all compliance education and training activities that are provided.



### RESPONSIBILITY OF THE INDIVIDUAL EMPLOYEE

**If you need any assistance or help, you can talk with your superior or the Global Compliance Area.**

Compliance is the responsibility of all VC's employees, regardless of their position within the company. We are all agents of the compliance process and must obey the laws and regulations that are applicable to the extent of our responsibilities, adhering to Votorantim Cimentos corporate culture, Values and Beliefs, and Code of Conduct.



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## WHAT IS THE RESPONSIBILITY OF THE LEADERSHIP

Management is responsible for ensuring the fulfillment of all the regulatory requirements applicable to the business activities related to their position within the company. This includes identifying, reporting on and administering all compliance violations.

To clarify the topic, here are some important actions to be taken by the leadership of Votorantim Cimentos:



- Implementing and ensuring adherence to the Compliance Program;
- Organizing your department activities to ensure compliance with the company rules and the applicable legislation while promoting a favorable environment for compliance and control management in the areas under your responsibility;
- Encouraging discussion of the Code of Conduct and explaining to your team why adherence is important, responding promptly and appropriately to any concerns raised by the employees;
- Protecting your team members from any retaliation in the event that they report, in good faith, actions that they believe to be in violation of the law or internal regulations;
- Raising employee awareness and commitment to the Compliance Program, with the assistance of the Compliance and People & Management departments.
- Ensuring that Compliance issues are identified and correctly shared with the Compliance department;
- Ensuring that meeting compliance obligations is covered in job descriptions and is considered in team performance management processes;
- Ensuring that your team is properly trained in regards to the compliance obligations relating to your area.

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## COMMUNICATION CHANNELS

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Whenever you witness behaviour that is considered inappropriate or violates our Code of Conduct, laws, regulations, policies or procedures, you should report this as soon as possible. This is the most effective way to detect current and avoid future problems.

You should voice your concerns and questions directly to your superior or another member of the management team. The Compliance and Legal departments can also assist you in this process.



**Votorantim Ombudsman**

The dialogue is part of our conduct.

[www.votorantimcimentos.com](http://www.votorantimcimentos.com)

If you don't feel comfortable to report a problem openly, use the Ombudsman Channel. They have the duty to preserve the anonymity and credibility of any issued complaint.

You can contact VC's Ombudsman Channel to obtain answers concerning the interpretation of the Code of Conduct and/or to file complaints with respect to this code.

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## OUR CULTURE

Our culture has always been based on ethical conduct, and our values and beliefs reflect the commitment of everyone at Votorantim to act in accordance with laws and regulations.

**This is the VC that we believe in, and is what we are building together.**



### SOLIDNESS

Pursuing sustainable growth and value creation.

### ETHICS

Always acting responsibly and transparently.

### RESPECT

Respecting people and always being ready to learn.

### ENTREPRENEURSHIP

Growing with the courage to do, innovate and invest.

### UNITY

The whole is stronger than the sum of parts.



### CULTIVATING TALENTS

We believe in and trust people, so we invest time and resources cultivating their talents.

### MERITOCRACY

We believe that people are unique and, thus, deserve to be valued fairly and in accordance with their accomplishments and deliverables.

### EXCELLENCE

We believe we can do more and better, overcoming challenges with discipline, humility, and simplicity.

### PRAGMATISM

We believe that it is essential to concentrate efforts on what is relevant, in an objective manner without losing sight of the big picture and the future.

### OPEN DIALOGUE

We believe that an environment of trust favors open dialogue and a forum to speak and be heard in, where the diversity of opinions can create better solutions.

### ALLIANCE

We believe our success is the outcome of the joint construction, strengthened by genuine relationships and win-win alliances.

### SENSE OF OWNERSHIP

We believe in those who take-on responsibilities, who work with passion and walk the talk, celebrate achievements and turn mistakes into learning experiences.



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## OPEN DIALOGUE

If you have any doubts or comments about this document or the Global Compliance Program, please contact the Compliance Department:  
**[global.compliance@vcimentos.com](mailto:global.compliance@vcimentos.com)**