

## PROCUREMENT POLICY

At R&G, we are committed to upholding the utmost integrity by making well-considered, impartial business decisions that align with the company's needs, while refraining from engaging in any personal or professional activities that could raise doubts, or the appearance of doubts, about an employee's capacity to act objectively.

All individuals, including exempt and non-exempt employees, temporary workers, consultants, and contractors, who engage with R&G's suppliers are expected to steer clear of any actions that may hint at unethical or compromising behavior in their dealings with suppliers. Supplier relationships should remain impartial and professional and must adhere to both the letter and spirit of all relevant laws, regulations, and policies.

Occasionally, it might be challenging to determine if a specific activity or relationship with a supplier could potentially create a conflict of interest or give the appearance of one. To navigate such situations, a straightforward rule is to refrain from engaging in any activity that could be perceived as inappropriate by others or could cause embarrassment to the employee or R&G. As a general policy, the following guidelines should be adhered to:

1. Employees must refrain from accepting or soliciting gifts, gratuities, kickbacks, stock grants or options, favors, loans, credits, preferential discounts, entertainment, travel, hospitality, or similar items from a supplier or its representative in connection with any business activity.



There is an exception for meals that clearly contribute to ongoing business discussions or foster the development of an already established business relationship, such as with business partners. Additionally, gifts of insignificant value may be accepted if:

- ✓ Receiving gifts is customary in the regular course of business.
  - ✓ The value of the gift is less than \$50.00.
  - ✓ The gift is not cash or a cash equivalent.
  - ✓ Acceptance of the gift complies with all laws, regulations, and policies, whether foreign or domestic,
  - ✓ The gift cannot be considered inappropriate and/or obligate or influence the recipient
2. Employees must ensure that the acceptance of any gift does not appear inappropriate or create any obligations or influence the recipient in any way.

Employees should handle confidential and/or proprietary information with the utmost care, taking into consideration the legal and ethical consequences of any failure to do so. Confidential information, including but not limited to supplier pricing, agreement terms and conditions, supplier technology roadmaps, product developments, etc., shall not be disclosed to any third party, including other R&G employees without a legitimate need to know. Employees should refrain from disclosing competitive information that could give a supplier an unfair advantage and would not otherwise be known.

3. Confidential information or business opportunities that become known to an employee due to their position within R&G may not be exploited by the employee or their family members for personal gain, such as engaging in stock transactions or investments.

4. Confidential information or business opportunities that become known to an employee due to their position within R&G may not be used by the employee or their family members for personal gain, including participating in stock transactions or investments.

5. Employees should ensure that purchasing related activities are conducted in accordance with national and international laws, regulations, policies and practices and are always managed with the company's best interest in mind

6. Employees have an obligation to educate the suppliers on R&G's Purchasing Code of Ethics, disclose any supplier activity that violates the Code and refrain from doing business with the supplier should a violation continue.

In cases where there is good cause and the employee provides full disclosure, exceptions to this Policy may be considered and authorized by the employee's supervisor if it is determined that there is no significant conflict of interest. Any such exemption must be promptly reported to the Ethic Committee

