

## Standard on the Use of Psychoactive Substances and other Drugs

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## 1. OBJECTIVES

The objective of this standard ("Standard") is to regulate the use of Psychoactive Substances by people who work for or represent PRIO S.A. (" Company") and/or companies directly or indirectly controlled by i ("Subsidiaries", together with the Company, " PRIO").

Its purpose is to ensure people's health and the operational safety of PRIO's assets, always aiming to reduce the risk of occupational accidents, a drop in production capacity, and damage to the Company, the environment and the communities where PRIO operates.

## 2. APPLICATION AND SCOPE

This Standard must be known and followed by PRIO Employees. It also applies to Allocated Third Parties and Business Partners, who are directly or indirectly related to the Company and work on PRIO's premises or assets.

The guidelines established herein must be applied globally, even if the respective local legislation has more lenient rules and, thus, allows or tolerates some conducts different from those defined herein. In cases of conflict between this Standard and local legislation, the more protective standard must apply.

## 3. REFERENCES

- Code of Ethics and Integrity; and
- Standard on Disciplinary Measures.

## 4. DEFINITIONS AND ACRONYMS

The following concepts and acronyms are presented to facilitate understanding of this Standard:

- **Employee:** Any individual who has a direct or statutory employment relationship with PRIO. It includes, in addition to employees hired under the Consolidation of Labor Laws (CLT) regime in Brazil, those hired under foreign laws or other corresponding regulations, interns, apprentices, temporary employees and members of committees, whether statutory or not.
- **Drug:** Any substance, natural or synthetic, legal or illegal, capable of modifying a person's physiological or psychological functions, as well as producing the phenomena of psychological dependence or organic dependence in varying doses. Legal drugs are substances whose

production, sale and consumption do not constitute a crime (e.g. medicines, alcohol and tobacco). On the other hand, illicit drugs are substances whose production and/or sale constitute a crime (e.g. marijuana, inhalants/solvents, cocaine, crack, among others).

- **Risk Functions:** PRIO considers all offshore activities, such as driving transport vehicles, to be risky functions.
- **LGPD:** General Data Protection Law, Law 13.709/2018.
- **Disciplinary Measure:** Set of actions that may be imposed to the Employee or Allocated Third Party in the event of violation of current legislation, the provisions and values provided for in the PRIO Code of Ethics and Conduct, the policies or other regulations of the Company.
- **Business Partners:** Any individual or legal entity with whom the PRIO Group has a commercial (e.g., suppliers of materials and/or services, clients, consortium companies), technical, social or institutional relationship.
- **P&P:** Company's People and Performance Department, responsible for human resources.
- **Psychoactive Substances:** These are drugs that act specifically on the central nervous system. They can cause changes in a person's mood, or even in his/her perception, behavior and states of consciousness.
- **Allocated Third Party:** Any individual or legal entity who does not have an employment relationship, but who provides non-occasional (routine) and paid services to PRIO, being subordinate to the Company, acting under its guidance and/or on its behalf. It also includes the consultant, holder of his/her own CNPJ (EIN), directly hired by PRIO to perform a function for a fixed period, physically or remotely, under contractual rules specified in a specific service agreement.
- **Misuse:** Characterized by the use, possession or distribution of Drugs without a medical prescription, or by their use in a manner that violates the law, socially accepted standards, or the terms provided for in this Standard.

## **5. SUNDRY PROVISIONS**

PRIO is committed to providing a safe, healthy and productive work environment for all its Employees and Allocated Third Parties. Such commitment is put at risk whenever an Employee or an Allocated Third Party unduly uses a Drug, especially a Psychoactive Substance.

PRIO firmly provides for that Drug Misuse is strictly prohibited within the scope of the Company, and may result in the application of Disciplinary Measures or contractual sanctions, depending on the specific circumstances of the case.

Notwithstanding the aforementioned prohibition, PRIO recognizes the need for specialized treatment for people dependent on Psychoactive Substances and other Drugs. Therefore, depending on the nature of the case, the company may forward its employees to specialized treatment programs, ensuring secrecy and confidentiality.

Regardless of the assistance provided by PRIO, the Company expects that all Employees and Allocated Third Parties are aware of this Standard and understand that the Improper Use of Drugs can put their own lives and those of their coworkers at risk.

Reports of violations of this Standard may be made directly to the Compliance Manager or via the PRIO Integrity Channel, using the following contacts:

- ✓ Website (external): <https://sistema.kadimaoutsourcing.com/integridade/Prio>
- ✓ Local calls: 0800-326-0826
- ✓ International calls: +55 (21) 2018-2075 (accepts collect calls)

This is an exclusive and secure channel for reporting conducts considered unethical or that violates the principles of PRIO's Code of Ethics and Conduct, agreements signed by the Company, internal policies and standards or current legislation.

The information recorded there will be received by an independent and specialized company, aiming to preserve the confidentiality of the information reported and your anonymity, if you so wish.

## **6. GUIDELINES**

### **6.1 Prohibitions on the Misuse of Psychoactive Substances and other Drugs**

Drug Misuse poses a serious threat to the health and safety of people, as well as to the operational security and reputation of PRIO. This risk becomes even more significant when it involves the consumption of Psychoactive Substances. Thus, PRIO established the following guidelines:

- It is not allowed to embark on offshore activities or perform Risky Functions under the influence of Psychoactive Substances and other Drugs without a medical prescription and without prior evaluation by the Sustainability team;

- It is not allowed to remain on PRIO's assets and facilities when signs of Improper Use of Psychoactive Substances and other Drugs are observed, or when the performance of activities under the influence of Psychoactive Substances and other Drugs is identified;
- The sale and distribution of drugs is not permitted on PRIO's assets and premises. The use of drugs is only permitted when accompanied by a medical prescription and prior occupational health assessment linked to PRIO's Sustainability management;
- The consumption of alcohol on the company's premises will only be permitted at events and festivities organized and scheduled by PRIO;
- The consumption of any alcoholic beverage must be stopped the day before boarding for offshore activities or arriving at the airport (at least 12 hours before the scheduled time); and
- The use of cigarettes, cigarillos, cigars, pipes, electronic cigarettes or any other smoking product (as defined by ANVISA), whether or not derived from tobacco, is prohibited in collective, private or public spaces, except in an area exclusively intended for this purpose, duly isolated and with suitable ventilation.

PRIO may take appropriate security measures when observing the Misuse of Psychoactive Substances and other Drugs and/or identifying the performance of activities under the influence of such Psychoactive Substances and other Drugs. These measures may involve, for example: (i) forwarding for evaluation by the Sustainability team; (ii) submission to testing in the manner provided for in Chapter 6.3 of this Standard; (iii) cancellation of scheduled boarding; or (iv) disembarkation of the person.

## **6.2 Communication on the Use of Psychoactive Substances and other Drugs**

People must inform the Sustainability team about the use or consumption of Drugs, especially Psychoactive Substances, which may interfere with their work functions. In the case of controlled medications, said communication must be accompanied by a medical prescription.

In cases of boarding, the medical prescription must be presented in advance to the Sustainability team and taken on board by the person carrying the substance. PRIO reserves

the right to assess whether the use of the substance may interfere with the performance of work activities and whether the packaging of the substance in question is suitable for shipment.

The attending physician will certify that the person can safely perform his/her job duties by issuing a written certificate. This certificate must be presented before boarding and resubmitted whenever there is an adjustment to the medication or prescribed dosage.

It is worth highlighting that some medications can affect people's behavior or cognitive ability, even if they are not specifically intended for that purpose. This includes, for example, herbal medicines, homeopathic medicines, weight loss formulas and medications, antihistamines, as well as those intended to treat acute conditions such as headaches, nausea or muscle pain. For this reason, said medications can also be considered as Psychoactive Substances in the context of this Standard, and their use must be communicated to the Sustainability team and/or the attending physicians, under penalty of non-compliance with this Standard.

In addition to the provisions of this Standard, persons performing offshore activities must follow the specific guidelines for each boarding.

### **6.3 Toxicological Analysis**

PRIO may carry out toxicological tests on its Employees, Allocated Third Parties and Business Partners to ensure people's health and the operational safety of its assets. The testing methods adopted by PRIO include: (i) toxicological analysis system using a breathalyzer; and (ii) analysis of biological material. The tests will be performed by the Sustainability team, in compliance with PRIO's internal rules.

Once announced, the exam cannot be postponed or rescheduled. Failure to perform toxicological analysis or providing false information will be considered violations of this Standard, subject to Disciplinary Measures or applicable contractual sanctions depending on the circumstances of the specific case.

Insufficient supply of biological material will also be considered a violation of this Standard, when it is not possible to carry out another collection within 3 hours from the first testing attempt, without a valid written medical explanation.



The procedures will be strictly confidential, with ethical commitment in all actions and in compliance with the LGPD.

#### **6.4 Treatment**

PRIO may, at its discretion, guide or forward its Employees for specialized treatment, which will be carried out by specialized professionals and clinics, within the healthcare plan made available by PRIO, and will be monitored by the Sustainability team.

No Employee with Drug Addiction will be dismissed due to requesting help to overcome this condition or for being in the process of rehabilitation. However, during this period, this person will not be able to perform Risk Functions and may, depending on the nature of the case, be temporarily removed from his/her activities, in accordance with labor legislation. Disciplinary measures may be applied in the event of refusal to participate in specialized treatment or in the event of abandonment of ongoing treatment.

#### **6.5 Employee Participation**

PRIO Employees and Third Parties must sign a term of commitment in which they declare:

- To be aware and agree with the terms of this Standard, including possible submission to the testing procedures described herein;
- To provide authorization for the results of such analyses to be reported to the PRIO Sustainability team, confidentially and in compliance with the rules provided for in the LGPD; and
- To have received training regarding the content of this Standard.

Business Partners must be responsible for obtaining written agreement from their employees and ensuring that they comply with the guidelines set forth herein, as applicable, when providing services to PRIO.

Failure to sign the Term of Commitment contained in Annex I of this Standard will constitute non-compliance with the same, subjecting the person to disciplinary measures or corresponding contractual sanctions.

## 7. GENERAL RESPONSIBILITIES

Aiming to ensure a safe working environment, PRIO establishes the following responsibilities:

### 1. Sustainability Management

- Manage, coordinate and monitor the implementation of this Standard and internal procedures for testing and treating addiction;
- Decide on the testing of Employees, Allocated Third Parties and Business Partners;
- Decide on the appropriate safety measure when a person shows signs of Misuse of Psychoactive Substances and other Drugs and/or of working under the influence of Psychoactive Substances and other Drugs.
- Support the analysis of the specific case by the P&P team and Ethics and Compliance Committee, when requested;
- Analyze cases forwarded to specialized treatment in cooperation with P&P management;
- Support the Ethics and Compliance Committee in granting specialized treatment;
- Support the Ethics and Compliance Committee and P&P management on the application of Disciplinary Measures, when requested;
- Disseminate this Standard, train people and promote prevention campaigns; and
- Ensure confidentiality in the application of this Standard.

### 2. P&P Management

- Support the Sustainability team in the management, coordination and monitoring of this Standard, when requested;
- Analyze cases forwarded to specialized treatment in cooperation with the Sustainability management;
- Depending on the nature and complexity of the case, evaluate and apply appropriate Disciplinary Measures; and
- Ensure confidentiality in the application of this Standard.

### 3. Ethics and Compliance Committee

- Evaluate and apply Disciplinary Measures in relation to this Standard;
- Decide on the specialized addiction treatment to be provided by PRIO; and
- Ensure confidentiality in the application of this Standard.

### 4. Legal:

- Support the Sustainability and P&P teams, as well as the Ethics and Compliance Committee, when requested; and
- Ensure confidentiality in the application of this Standard.

### 5. Compliance

- Support the Sustainability team in the management, coordination and monitoring of this Standard, when requested;

- Support the Sustainability and P&P teams, as well as the Ethics and Compliance Committee when requested; and
- Ensure confidentiality in the application of this Standard.

## **8. FINAL CONSIDERATIONS**

This Standard may be modified at any time, upon request by the responsible area and approval by the Legal and Compliance departments, as well as PRIO's Board of Directors. If you have any questions, please contact your manager or a member of PRIO's P&P, Sustainability or Compliance departments.

## **9. ANNEXES**

### **Annex I - Term of Commitment**

**Annex I**

**TERM OF COMMITMENT TO THE STANDARD ON THE USE OF PSYCHOACTIVE  
SUBSTANCES AND OTHER DRUGS**

I, \_\_\_\_\_, hereby declare that I HAVE READ, UNDERSTOOD and ACCEPT the terms of the PRIO Standard on the Use of Psychoactive Substances and other Drugs, and authorize the results of toxicological analyses to be reported to the PRIO Sustainability team, confidentially and in compliance with the rules provided for by the LGPD.

I further declare that I have received training regarding the content of this Standard and have been informed of the existence of channels for reporting concerns and clarifying doubts.

[PLACE] AND [DATE],

\_\_\_\_\_ , \_\_\_\_\_ , \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
CPF [SSN]