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**RISK MANAGEMENT POLICY**

**UNICASA INDÚSTRIA DE MÓVEIS S.A.**

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Approved at the Board of  
Directors Meeting held on  
December 13, 2021.

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# UNICASA INDÚSTRIA DE MÓVEIS S.A.

## RISK MANAGEMENT POLICY

### 1. PURPOSE

**1.1** This Risk Management Policy establishes the principles, guidelines and responsibilities in managing the risks of Unicasa Indústria de Móveis S.A. and its subsidiaries (“Company”) so as to identify and monitor the risks related to the Company or its industry.

### 2. SCOPE

**2.1** This Policy applies to the Company and its subsidiaries, as well as all employees, managers, statutory and non-statutory officers, members of the Board of Directors, committees and Audit Board (if applicable), representatives and third parties directly or indirectly related to the Company and its subsidiaries.

### 3. CONCEPTS

**3.1** For the purposes of this Policy, the following concepts will be used:

- **Risk:** Possibility of an event that adversely affects the achievement of the Company’s goals or processes.
- **Risk appetite:** It is associated with the level of risk the Company is willing to accept while pursuing and implementing its strategy.
- **Priority risks:** Risks with potentially high probability and impact for the business, whose management must be prioritized and whose indicators must be monitored regularly.
- **Risk matrix/model:** Establishes an individual comparison of Risks based on the degrees of impact and probability of risk occurrence for the purpose of prioritization and management. The risk matrix is a constantly evolving mechanism that is updated at least annually when the Company’s strategic plan is reviewed and promptly when Risk events arise.

## 4. GUIDELINES

**4.1** The Company is committed to the dynamics of Risk management in order to preserve and develop its values, assets, reputation, competitiveness and business perpetuity.

**4.2** The purpose of Risk management is to understand risks, as well as assess and define response actions so that losses can be prevented and reduced in order to maintain Risks at acceptable levels. Risk analysis should help the decision-making process across all management levels of the Company.

**4.3** Risk management contributes to the monitoring and achievement of the Company's goals. The Company's approach is to integrate Risk management with the ordinary course of its business through a structured process.

**4.4** The main risks are structured in accordance with the following classification:

- a) **Strategic:** These are risks associated with the strategic decisions of the Company to achieve its business goals and/or resulting from lack of capacity or ability;
- b) **Operational:** Risks related to the Company's operations (processes, people and technology) that affect operational efficiency, as well as the effective and efficient use of resources, thereby hampering the Company's activities. These risks can occur in diverse ways, such as fraudulent acts, business interruption, employee misconduct, incapacity to produce and/or distribute its products under the conditions and timeframes established, resulting in financial and commercial losses, inspection fines and/or legal and reputational impacts;
- c) **Financial:** Risks associated with the exposure of financial/accounting operations of the Company and reliability of its balance sheet. These can materialize as a result of ineffective management of cash flows to maximize and generate operational cash, return on financial transactions, funding / investments, possibility of issuing incomplete financial, managerial and tax reports, which can be inaccurate or untimely, exposing the Company to fines and penalties.
- d) **Regulatory or Compliance:** Risks related to compliance with rules and laws applicable to the Company's industry, general laws of Brazil or international laws (environmental, labor, civil and tax/fiscal laws), agreements, regulations, Code of Conduct and/or other policies;
- e) **Social and environmental:** Risks of losses arising from the negative impacts on the environment and society resulting from environmental impacts , impacts on native

peoples and communities and the protection of human health, cultural properties and biodiversity; and

- f) **Image:** Possibility of occurrence of an event, usually caused by other risks, which may damage the reputation, credibility or brand of the Company, including due to negative publicity, whether true or false.
- g) **Information:** Risk associated with the loss or misuse of confidential personal data or information that could harm the business and damage the reputation of the Company.
- h) **Information Technology:** Risk of the Company incurring failures in its information technology systems that impact its business and activities.

**4.5** It is essential that the bodies and executives involved understand and disseminate how to correctly differentiate impacts caused by events and situations that do not directly involve Risk management, such as unsuccessful strategic decisions. This understanding is aimed at improving and strengthening the Company's corporate governance model.

**4.6** All Risks and limits approved must be formalized in detailed, explanatory reports, with action plans if applicable, identifying the persons responsible and deadlines for concluding the action plans.

## **5. MANAGEMENT PROCESS**

**5.1** Risk assessment is carried out mostly in accordance with the items below:

- a) Identification of factors (causes) of Risks and implications on projected goals (targets and results);
- b) Analysis of the main Risks that could affect the Company's goals by determining the level of impact and probability of the Risks occurring;
- c) Prioritization and definition of the Limit (or appetite) of each Risk the Company and its shareholders are willing to run in the pursuit of return and creation of value, classifying the Risks according to the risk prioritization matrix and definitions below:
  - 1. **Unacceptable Risk:** Risks are unacceptable and demand priority management action to eliminate the risk component or reduce its severity and/or frequency.
  - 2. **Unexpected Risk:** Unexpected risks, with high impact and low frequency. Risks must be quantified and monitored regularly to continuously guide mitigation strategies and/or contingency plans. The goal is to be prepared if the event does take place.

3. Probable Risk: Risks of lower criticality due to lower impact on business value. Focus should be on defining acceptable levels of loss due to events and limits of authority that prevent the impact level from increasing over time. Treatment subject to the feasibility of taking out insurance in response to such risks.
4. Acceptable Risk: Risks of low impact and frequency, with no need for continuous monitoring.

**5.2** After assessment, the Risks must be addressed through initiatives defined and implemented by the Board of Executive Officers to adjust the Company's exposure to the Limits of the Risk approved.

**5.3** The Compliance and Risk Management Area of the Company will help management in the response given to the risks detected, i.e., their (i) acceptance; elimination, (ii) mitigation; or (iii) transfer to third parties, and the tools used in the Risk treatment process must ensure that such response be within acceptable limits.

**5.4** Communication and consultation among employees of the Company about Risks and their management must be ongoing, with the aim of sharing information and improving management processes.

**5.5** The Risk management process must be observed in all decision-making processes of the Company, including strategic planning, investment decisions and project management, from the moment a project is created to throughout its entire implementation.

**5.6** After Risks are identified, these must be monitored continuously according to the division of responsibilities.

## **6. RESPONSIBILITIES**

**6.1** Following is the responsibility of the Board of Directors of the Company: Approve the risk management policy and ensure the effectiveness of risk management systems.

**6.2** Following is the responsibility of the Board of Executive Officers: Review and approve the general definitions of risk management strategies, defining the risk appetite and supporting the creation of a risk management culture.

**6.3** Following is the responsibility of the Internal Audit area: Continuously assess the effectiveness of the risk management model, establishing the risk management methodology and disseminating the risk management culture.

**6.4** Following is the responsibility of the Audit Committee: Review and approve the risk appetite and risk assessment.

## **7. VALIDITY**

**7.1** This Policy was approved by the Board of Directors of the Company on December 13, 2021 and will come into effect after the Shareholders Meeting that approves the Financial Statements of fiscal year 2021, indefinitely until a deliberation to the contrary.