

Raízen Policy – PLT.14

Integrity Policy



Objective

This Integrity Policy ("Policy") reflects the commitment of Raízen S.A. and its subsidiaries ("Raízen" or "Company") to promote a culture of integrity, guided by ethics, transparency, and respect for applicable laws, Code of Conduct, internal policies, and rules.

The main objective of this Integrity Policy is to establish guidelines and practical principles to ensure an ethical environment free of corruption and illicit practices that put Raízen's reputation at risk.

If you have any questions about this policy, the Compliance team should be contacted by email: compliance.raizen@raizen.com

Scope

This Policy covers all areas, units, businesses, and functions of the Raízen Group and applies to all Executive or Statutory Managers at any hierarchical level, employees and third parties, in Brazil or abroad.

It is also applicable to all companies whose direct or indirect shareholding control is held by any of the companies of the Raízen Group, as well as to joint ventures and/or consortia, in which it acts as leader or operator

Support from Senior Management

This policy is part of the Raízen Compliance Program, which has as its main pillar the support of senior management, which has made a public commitment to promote a culture of integrity in its relationships, always acting ethically and transparently.

Revision

Version	Date	Changes
0	12/05/2015	Creation of the Policy
1	14/07/2017	Items 1. Introduction; 2. Definitions; 5.3.2. Guidelines; 6. Responsibilities;
2	30/08/2019	Full Review
3	01/07/2020	Complete revision, change of name to "Integrity Policy" and incorporation of PLT.19 - Dialogue with the Public Administration
4	31/03/2023	Full Review
5	31/01/2025	Full Review This policy is valid for 24 months from its publication.

1. Guidelines

1.1 Anti-Corruption

1.1.1. Interaction with Public Administration and Public Agents

Raízen does not tolerate acts of corruption, regardless of whether they occur in the public or private sphere, which can be extremely harmful to the Company and generate not only financial but also reputational consequences.

When interacting with people who hold positions, paid or unpaid, in the Public Administration, directly or indirectly ("Public Officials"), in any form, in the name and benefit, the Raízen Group, employees, or third parties must not:

- (i) offer, accept, request or pay, directly or indirectly, undue advantages;
- (ii) use social performance initiatives, such as charitable donations, sponsorship, social investments or the practice of giving/accepting gifts, entertainment and/or hospitality, as a way to obtain or allow an undue advantage to be obtained from third parties, whether public or private; or
- (iii) use third parties, whether agents, agents, attorneys, service providers in general and/or class or representation entities to, even indirectly, offer or accept undue advantages.

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In order to reinforce an environment of ethics and respect for the laws and regulations applicable to the Raízen Group's business, when acting under any form of representation, whether direct or indirect, employees and third parties, legal entities or individuals, must always:

- (i) respect the thresholds set for Gifts and Hospitality established in this policy;
- (ii) in case of doubt, as to the acceptance or offer of Gifts, Hospitality, entertainment, they must, before taking effect, make the appropriate report in the Compliance Reporting Tool, available in the Ethics Space or consult the Compliance Area, by e-mail (compliance.raizen@raizen.com); and
- (iii) verify, upon request, the suitability of the beneficiary of social performance initiatives to be carried out by Raízen's Compliance Area, which will also be responsible for formalizing, including the inclusion of a standard Compliance clause, the request and its respective purpose, according to internal policies and procedures and rules provided for in the Policy (PLT. 10 Social Performance) and Procedure (PR. DHO. A08 - Donation Procedure).

1.2 Visits, Inspections and Audits by the Public Administration

Raízen requires and expects that all interactions with the Public Administration and Public Agents take place ethically, transparently, in accordance with applicable legislation and observe the following guidelines:

- (i) the relationship with Public Agents must be ethical, professional, cordial and transparent, with clear and direct communication, avoiding dubious interpretations;
- (ii) In the case of communication by email or cell phone, only corporate email or cell phone should be used. Activities carried out by cell phone must later be formalized by e-mail;
- (iii) the holding of meetings with Public Agents must be preceded by an express and clear definition of their agenda;
- (iv) meetings with Public Officials must be held by persons trained for this purpose, who are up to date with the relevant training(s) assigned to them and will necessarily have the participation of at least two (2) employees and/or representatives duly mandated by Raízen;

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- (v) Employees and third parties who have interactions with Public Officials must keep clear and precise records (minutes of meetings or written formalization of other types of interaction that give rise to decision-making). In the case of meetings, the minutes must contain, at least, the name of all participants, date, time and place of the meeting, as well as a brief summary of the issues covered and any other relevant information. Such records may be produced by the Public Agents with whom the meeting or interaction took place or, failing that, by the employee or third party, and shared with the Public Agents who attended the meeting or with whom the interactions occurred, or with the leader of the group. Such records must necessarily be made available in the appropriate reporting tool in the Ethics Space within a period of up to 15 (fifteen) business days;
- (vi) in the case of accompaniment by Public Agents in inspections and on-site visits, employees and third parties must only provide exclusively technical and operational information by presenting the documents required by the authority, according to applicable internal procedures;
- (vii) procedures for obtaining and renewing government licenses, permits and authorizations must follow a clear and transparent procedure of the competent public body and must be carried out by people who are up to date with the relevant training(s) on the subject, and the payment of any fee, for any reason, not provided for in applicable laws and regulations, is expressly prohibited. and all questions must be answered officially, in line with our ethics and compliance commitments;
- (viii) if the employee understands that a meeting with a Public Agent does not follow the defined agenda or that the discussion of issues that may generate uncertain interpretation has begun, he must ask to be recorded in the minutes of his departure from the meeting and leave, in addition to reporting the event to his manager and the Compliance Area;
- (ix) the hiring of any third parties to provide services that have as their object or part of their scope the interaction with the Public Administration and/or Public Agents must be preceded by a verification of suitability, to be carried out upon request by Raízen's Compliance Area, as well as the formalization of a contract with a Compliance clause; and
- (x) meetings with Public Agents should be held, preferably, at the official offices of the relevant Public Administration, during the officially announced service hours. If the meetings take place at Raízen's offices or those of third parties, the Public Agent must be received with the highest standards of ethics and transparency. If virtual, the recording can serve as minutes, with the consent of the participants, which must be collected at the beginning of the meeting and later recorded in the Compliance Reporting Tool;
- (xi) any type of concession of ticket quotas, invitations to Public Agents in any type of sporting events, promotional or not promoted by Raízen and group companies, is prohibited.

With respect to the above guidelines, in view of the Company's recognition of the need for more recurrent contacts with the Public Administration in some areas, due to the very nature of its activities, such as: RelGov Area; legal, etc., they should only formalize a report of interaction with Public Agents, in the indicated channels, if they understand that it represents a risk of questioning as to their compliance, even in the future.

1.3 Hiring of Former Public Agents

1.3.1 For the Company's Staff, as employees

The hiring of Former Public Officials, for the Company's staff, as employees, must be preceded by analysis and authorization by the Compliance Area, which will verify the exemption, convenience and respect for the quarantine rules of six (6) months, counted from the official dismissal of the Public Agent from the Public Administration staff, as established in Law 12,813/13 ("Conflict of Interest Law") and politically exposed persons ("PPE"), in relation to the position to be occupied.

For employees, already hired, who are identified through PPE monitoring and/or eventually apply for positions as Public Agents; politicians; elective mandates, paid or unpaid, must report in the Compliance Reporting Tool, to assess potential conflicts of interest and adopt any measures to be adopted by the Company to mitigate risks, even if potential.

Situations not reported may subject the employee who did not report it to disciplinary measures, as provided for in internal policies in particular, but not limited to the Consequences and Disciplinary Measures Policy (PLT 25).

If any Raízen employee has any interpersonal relationship or degree of direct or collateral kinship with Politically Exposed Persons ("PPE"), they must report it in the Compliance Reporting Tool, to assess potential conflicts of interest and adopt any measures.

1.3.2 As advisors, third parties and as counterparty

Contracts with companies that have former Public Agents in their corporate structure must be preceded by a suitability audit and verification of adequate compliance with the quarantine period of six (6) months, counted from the official dismissal of the Public Agent from the Public Administration staff, as established in the Conflict of Interest Law; whether the partners and/or shareholders are considered politically exposed persons ("PPE"); and if there is any impediment to hiring.

Raízen will establish measures for the analysis of PEPs and Related PEPs, in accordance with mechanisms for Knowing its Third Parties (item 6 - Guidelines and mechanisms for Knowing its Third Parties, partners, customers and employees) and other procedures of the Company, in addition to it

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Raízen may enforce contractual penalties against the third-party company, in addition to seeking compensation and other measures in case of non-compliance with the rules set forth herein.

1.3.3 Offering and Receiving Gifts, Gifts and Hospitality

3.1 Offer or receipt linked to Public Agents

It is forbidden to offer or receive gifts, gifts, and hospitality between Raízen and Public Agents.

3.2 Offered by Private Agents

- (i) always be guided by impartiality, transparency and prevention of conflicts of interest, even if potential;
- (ii) ensure that the Gift, Gift and/or Hospitality offered/received does not constitute an undue advantage;
- (iii) take into account local rules and good customs in setting the values of the offer/receipt of Gift, Gift and/or Hospitality and the limits set forth in item 2.2.4 Limit and Approval in this policy.

1.3.4 Limit and Approval

3.1 Gifts and Gifts

The limit for offering or receiving Gifts and Gifts is up to R\$ 600.00 (six hundred Reais), allowed as long as the employee reports this fact in the Compliance Reporting Tool for analysis by the Compliance area and approval by the immediate manager.

The receipt of Gifts and Gifts in an amount greater than R\$ 600.00 (six hundred Reais) must be returned to the person who granted it with a message of thanks, accompanied by an explanation of Raízen's Integrity Policy and Code of Conduct.

If the return is impractical or causes embarrassment, the employee must report the fact to the Compliance Report Tool detailing the item received, which must be reverted to the Raízen Group for the sole and exclusive purpose of making donations to entities of interest or conducting raffles among its employees. The draw must be carried out by the People Team after deliberation by Compliance.

3.2 Hospitality

Regarding the receipt or offer of hospitality, regardless of the amount, the employee must report the fact in the Compliance Reporting Tool and wait for the analysis and approval of the Compliance area and the immediate manager.

In case of doubt, regarding the acceptance or offer of Gifts, Gifts and Hospitality, they must, before their effectiveness, make the appropriate report in the proper tool, available in the Ethics Space or consult the Compliance Area, by e-mail, compliance.raizen@raizen.com.

2. Public Contracts and Bids

The business opportunities arising from bids, according to Law 14,133/21 ("Bids"), must always be conducted by employees and third parties in strict compliance with the ethical and compliance parameters established by the Code of Conduct; Raízen's policies and standards; and by this Policy, as follows:

- (i) any proposals submitted in Bids must follow parameters consistent with the prices practiced by Raízen, in situations similar to those of the Bidding in progress;
- (ii) the documents to be presented in Bids must be previously analyzed by the Legal Department;
- (iii) the formation of consortia/joint ventures for participation in Bids must be preceded by analysis by the Legal Department. The Compliance Area must conduct a verification of the suitability of the partners/shareholders of the members of the consortium/joint venture;
- (iv) in meetings with potential competitors, when requested by the bidding entity or for the discussion of consortia/joint ventures, it must be preceded by a defined agenda and subsequent formalization of minutes, with the matters discussed and decisions taken at the meeting, observing the obligation to register said minutes in an appropriate tool, in the case of administrative contracts, as provided for in this Policy;
- (v) in the case of an administrative contract signed with the Public Administration, after signing the document, Raízen will adopt measures to monitor and control the execution of the contract, in order to prevent possible fraud and unlawful acts; and
- (vi) The hiring of former Public Agents for technical support in Bids should be avoided or, when necessary, should be preceded by risk analysis (due diligence) by the Compliance Area, which will be responsible for the approval or disapproval, in a formalized manner, of the partnership.

In contracts signed with Public Agencies, the following practices will not be tolerated by Raízen under any circumstances:

- (i) Frustrating or defrauding, by means of adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
- (ii) Prevent, disturb or defraud the performance of any act of public bidding procedure;
- (iii) Removing or seeking to remove a bidder, by means of fraud or offering an advantage of any kind;
- (iv) Fraud of a public bidding or contract resulting from it;
- (v) Create, fraudulently or irregularly, a legal entity to participate in public bidding or enter into an administrative contract;
- (vi) Fraudulently obtaining an undue advantage or benefit from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the public bidding call or in the respective contractual instruments; or
- (vii) Manipulating or defrauding the economic and financial balance of contracts entered into with the public administration.

3. Relationship with private entities

9.1 Corruption between private individuals

Raízen does not tolerate any form of corruption between private parties, requiring that all relationships between Raízen and private entities be based on ethics and transparency, free from acts that may be classified as illegal conduct, such as the promise or offer of undue advantage to third parties on behalf of Raízen and the funding or sponsorship of illegal practices.

4. Accounting, tax and financial practices

Raízen ensures an upright and transparent reputation in its accounting, tax, and financial practices, so it does not allow, under any circumstances, unethical practices or practices that in any way violate current legislation, such as:

- (i) Issuance of invoices with a price above market value;

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- (ii) Acts that harm the public coffers, suppressing or reducing taxes, social contributions or any accessory, through fraud;
- (iii) Suppressing or reducing taxes, or social contribution and any accessory;
- (iv) Misappropriation;
- (v) Evasion of social security contributions;
- (vi) Malicious deception with the purpose of hiding the truth or evading the fulfillment of an obligation;
- (vii) Acts of hindering or delaying the occurrence of the taxable event, or altering its essential attributes in order to reduce the amount of tax due.

5. Prevention of Money Laundering and Terrorist Financing

Although it is not an obligated person, under the terms of article 9 of Law 9,613/98, the Law for the Prevention of Money Laundering and Financing of Terrorism, Raízen acts actively so that it is not involved in activities that may constitute money laundering and terrorist financing, and it is up to everyone to ensure the legality and good practices in carrying out financial transactions involving the Company.

6. Guidelines and mechanisms aimed at Knowing your Third Parties, Partners and Service Providers (KYP), your Customers (KYC), your employees (KYE)

The Due Diligence process is carried out with the objective of capturing the reputational and legal risks of counterparties prior to the contracting process, prior to the signing of a contract or negotiation of any nature and in accordance with the guidelines of the risk classification methodology established in the Due Diligence Risk Matrix.

All third-party contracting must be preceded by the verification process, to be conducted in accordance with specific procedures, depending on the Business, and its exposure to risk. In addition, credit granting processes (as established in PLT 07 – Credit Policy) can only occur after Third Party Due Diligence and if there are any indications that may associate the client with illicit activities or suspicions of money laundering, employees are instructed to report according to item 12 of this policy (Reporting and Doubts).

The Compliance Area will use tools and processes for KYP, KYC and KYE in accordance with Third Party Due Diligence procedures, in accordance with the risk classification methodology established by the Due Diligence Risk Matrix to identify acts of corruption, money laundering, or other risks presented by customers, suppliers, partners or employees, before and during the commercial or employment relationship, according to specific Due Diligence guidelines and procedures.

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Some areas, however, have specific policies and procedures, which mention the mandatory demand for counterparty checks, they are:

- (i) contracts carried out by the Procurement area that must follow the flow established according to the Procurement Policy (PLT 02) and the Procurement, Equipment, Materials and Services Procedure (PR. FIN. C05);
- (ii) all third-party contracts, which specifically involve interaction with the Public Administration, must be preceded by the counterparty verification procedure, to be conducted by the SNT area according to the guidelines of the Procurement Policy (PLT 02) and the Procedure for Acquisitions, Equipment, Materials and Services (PR. FIN. C05);
- (iii) all demands for donations, sponsorships, and social investments must be preceded by counterparty checks, to be conducted by the Compliance Area, on demand, as provided for in the Social Performance Policy (PLT 10);
- (iv) for mergers, acquisitions and other partnerships of the same nature, the other guidelines inherent to the subject contained in the Mergers and Acquisitions Procedure – Compliance & M&A (PR. JUR. A14);
- (v) all Trading operations must be preceded by counterparty checks, to be conducted by the Compliance Area, on demand, as provided for in PR. JUR. A11 – Reputational and Legal Analysis of Counterparty – Trading;
- (vi) all Power operations must be preceded by counterparty checks, to be conducted by the Compliance Area, on demand, as provided for in PR. JUR. A15 - Reputational and Legal Analysis of Counterparty – Power;
- (vii) all Biogas operations must be preceded by a counterparty check, to be conducted by the Compliance Area, on demand PR. JUR. A20 - Reputational and Legal Analysis of Counterparty – Biogas;
- (viii) all powers of attorney granted by Raízen to third parties must be preceded by a counterparty check, to be conducted by the Compliance Area, upon request of PR. JUR. A01 – Issuance, Renewal and Revocation of Powers of Attorney;
- (ix) all hiring of law firms and/or lawyers for the Provision of Legal Services must be preceded by a counterparty check, to be conducted by the Contracting Area. Compliance, on-demand PR. JURB01 – Hiring of Offices and/or Lawyers to Provide Legal Services;

7. Social Performance

All demands for donations, sponsorships and social investments must follow the approvals contained in the Manual of Authorities, after checking counterparties as provided for in item 6, as well as be formalized in a specific instrument with Compliance Clauses.

No employee or third party shall make charitable donations and/or conduct any other social performance initiatives, with resources and/or on behalf of Raízen, with the objective of obtaining undue or personal advantage.

In addition, it is the duty of employees to ensure that donations and any other social performance initiatives benefit third parties who share and observe Raízen's principles of ethics and compliance.

8. Mandatory Training

All employees, upon their admission, must take the mandatory online Compliance training, available on the Raízen Learning platform, namely: Code of Conduct; Anti-Corruption and Competition Compliance ("Mandatory Training").

Depending on the activities performed by the employee, he will be classified as a "risk public" and will be assigned specific training, which aims to deepen the content of the Mandatory Training, according to the guidelines of the Training Policy (PLT 20).

Employees who do not carry out the Mandatory Training, within the due deadlines and in accordance with the established parameters, will be included in a list to be shared with Raízen's Leadership, and will be subject to the Consequences and Disciplinary Measures Policy PLT. 25, as well as are subject to the interruption of access to Raízen's systems, according to the Access Blocking Procedure – Compliance Training (PR. JUR. A13).

9. Governance

10.1 Compliance Area

The Compliance Area is responsible for the implementation and effectiveness of Raízen's Compliance Program, under the terms defined by the Committees, as defined below:

The duties of the Compliance Area are:

- (i) promote and ensure the adoption of the best ethics and compliance practices;
- (ii) ensure that the guidelines of the Ethics and Compliance Program are accessible to all employees and third parties;

- (iii) map the Company's compliance risks, keeping the Committees updated;
- (iv) propose policies, procedures and make recommendations to the Committees;
- (v) ensure full compliance with the guidelines of the Ethics and Compliance Program;
- (vi) ensure the implementation of internal controls that mitigate the Company's Compliance risks;
- (vii) develop and manage the Company's Compliance training;
- (viii) develop communications and internal actions related to Compliance topics;
- (ix) support the management of the Ethics Channel by Raízen's internal audit, ensuring the regular investigation of complaints, adoption of disciplinary measures, and other measures proposed by the Ethics Committee for substantiated complaints; and
- (x) report its activities periodically to the Audit and Integrity Committee.

The Compliance Area is directly linked to the Presidency. This area will not, under any circumstances, be linked or subordinated to the Company's business areas.

10. Committees

The Company also has Committees dedicated to supervising and monitoring compliance with the Ethics and Compliance Program, as well as advising Raízen's Board of Directors:

10.1 Audit Committee

The Audit and Integrity Committee is the advisory body directly linked to the Board of Directors, of a permanent nature.

Its duties are defined by the Board of Directors, as well as by its Internal Regulations (both available at <https://ri.raizen.com.br/esg/estatuto-codigos-e-politicas/>).

The Committee is composed of at least three members, including two independent members of the Board of Directors and a third appointed by the Board, in accordance with regulatory requirements.

Meetings: The Committee shall meet ordinarily every three months and extraordinarily whenever necessary, as requested by the Committee Coordinator or any of its members. The accounting information must be assessed by the Committee before its disclosure.

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Additional Meetings: The Committee will also meet with the Board of Directors, independent auditors and executives responsible for internal audit whenever necessary.

10.2 Ethics Committee

The Ethics Committee is an independent, permanent advisory body, governed by its Internal Regulations.

10.3 Compliance Committee

The Compliance Committee is a multidisciplinary body of a permanent nature, convened and chaired by the Compliance Officer, on a quarterly basis, with a focus on promoting ethics and compliance issues in Raízen's business areas, in accordance with its Internal Regulations.

11. Prevention Guidelines and Mechanisms

Raízen will carry out monitoring and testing activities in its activities, when relevant, in order to identify the risks related to the use of its products and/or services in the practice of Corruption, Money Laundering and Terrorist Financing and, when applicable, in order to ensure the effectiveness of this Policy, it will carry out internal controls to identify, prevent, detect, and manage financial crime risks and/or regulatory requirements.

12. Reporting and Questions

It is the responsibility of employees and Third Parties to ensure compliance with this Policy. Indications of non-compliance or doubts about compliance with this Policy, related procedures and/or the Code of Conduct and applicable laws should be reported to the Compliance area, the direct manager, the People team or through Raízen's Ethics Channel, through the following channels:

Telephone Answering	
Brazil:	0800 772 4936
United States:	1 (800) 509-4201

Switzerland:	0800 898 773
Argentina	0800-345-1701
Paraguay	009-800-120-004

Online Service	
Web site:	https://www.raizen.com.br/sobre-a-raízen/canal-de-ética
Email:	canaldeetica@raizen.com

Reports can be made anonymously, if the reporting party does not want to reveal their identity, and must include as much detail as possible to allow for a full investigation. All reports and investigations are treated confidentially.

Raizen does not tolerate any type of retaliation against any person, internal or external, who in good faith reports an actual or suspected violation of Raizen's policy or applicable law or who cooperates in good faith with any investigation of alleged misconduct.

13. Disciplinary Measures

Employees who do not comply with the terms and provisions of this Policy may be held liable, not only for disciplinary measures, to be applied by the Company, under the terms of its Policy of Consequences and Disciplinary Measures (PLT 25), as well as for the sanctions that may be adopted by the Public Administration, in accordance with current legislation.

ANNEX 01 – DEFINITIONS AND REFERENCES

A. Definitions

Public Administration: covers the bodies and companies that are part of the direct administration, which is composed of the entities and bodies of the Executive, Legislative and Judiciary branches, including the Public Prosecutor's Office, in all spheres, whether federal, state or municipal, as well as the bodies and companies that are part of the indirect administration, encompassing entities that were created with their own legal personality to carry out government activities that need to have autonomy and act in a decentralized form, which are autarchies, foundations, regulatory agencies, public companies (entity endowed with legal personality under private law, with creation authorized by law and with its own assets, whose capital stock is fully held by the Union, the States, the Federal District or the Municipalities) and mixed-capital companies (entity endowed with legal personality under private law, with creation authorized by law, in the form of a corporation, whose shares with voting rights belong mostly to the Union, the States, the Federal District, the Municipalities or the entity of indirect administration).

Public Officials: any natural person who exercises, even temporarily, with or without remuneration, by election, appointment, designation, hiring or any other form of investiture or bond, mandate, position, employment or function in bodies and companies that are part of the direct or indirect Public Administration.

Gifts: item of low economic value, offered to individuals or Public Agents, whose value must be lower than the amount provided for in the Code of Conduct and distributed in a generalized way, as a courtesy, advertising or habitual dissemination.

Ethics Channel: means the outsourced and confidential channel, whose contacts are: 0800-772-4936 (Brazil) and abroad: 1 (800) 509-4201 (United States) / 0800 898 773 (Switzerland) / 0800-345-1701 (Argentina) / 009800-120-004 (Paraguay) / canaldeetica@raizen.com.

Compliance Clauses: means a contractual provision that establishes integrity guidelines.

Code of Conduct: means the Raízen Code of Conduct available on the Intranet, Workplace (Knowledge Library – Ethics Space – Code of Conduct) or Raízen website (<https://www.raizen.com.br/sobre-a-raizen/code-of-conduct>).

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Know Your Client (KYC): Procedure in which Raízen will establish a set of well-defined mechanisms seeking to identify and know the origin and constitution of the assets and financial resources of a Third Party, notably the client.

Know Your Employee (KYE): Procedure in which Raízen will establish a set of well-defined mechanisms aimed at providing adequate knowledge of its employees. This procedure begins with the hiring of the employee, and must continue with training and programs to prevent and combat money laundering and corruption, reinforced with the regular application of questionnaires related to the Compliance Program and People Team, when applicable.

Know Your Partner (KYP): Procedure in which Raízen will establish a set of well-defined mechanisms aimed at providing adequate knowledge of its Third Parties, including its business partners.

Due Diligence: is the process of legal and reputational analysis of counterparties, based on information provided and through the use of public data research tools.

Ethics Space: means section available in the knowledge library located on Workplace ((20+) Ethics Space | Workplace) dedicated to the disclosure of all Compliance policies and procedures, Code of Conduct, Ethics Channel, reporting tools, frequently asked questions and answers, among other ethics and Compliance content.

Compliance Reporting Tool: is the system customized by Raízen, called CAP (Process Automation Center), for the purposes of reporting periodic self-declaration of compliance, public administration interactions, conflicts of interest and gifts, and hospitality.

Terrorist Financing: The act of offering or receiving, obtaining, keeping, keeping in deposit, requesting, investing or in any way contributing to the obtaining of an asset, good or financial resource, for the purpose of financing, in whole or in part, a person, group of persons, association, entity or criminal organization whose main or secondary activity is to be carried out, even if the crimes provided for in the Anti-Terrorism Law are committed.

Hospitality(s): offer of services or expenses with transportation, food, lodging, courses, seminars, congresses, events, fairs or entertainment activities, granted by a private agent to a public agent in the institutional interest of the body or entity in which it operates.

Money Laundering: Criminal act the act of concealing or dissimulating the nature, origin, location, disposition, movement or ownership of goods, rights or values deriving, directly or indirectly, from a criminal offense.

Bidding(s): means any administrative procedure through which the public administration selects the best proposal among those offered by the various interested parties, with two objectives: (i) the execution of a contract and (ii) the obtaining of the best technical, artistic or scientific work.

Gift(s): good, service or advantage of any kind received from those who have an interest in the decision of the Public Agent or collegiate in which he participates and which does not constitute a Gift or Hospitality.

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PEP (Politically Exposed Persons): For the purposes of this Policy, the persons listed in Circular 3,978/20 of the Central Bank will be considered PEP: (i) holders of elective mandates of the Executive and Legislative Branches of the Union; (ii) the holders of positions, in the Executive Branch of the Union, of: (1) Minister of State or equivalent; (2) Special Nature or equivalent; (3) president, vice-president and director, or equivalent, of indirect public administration entities; and (4) Advisory Group and Senior Management and Advisory Group (DAS) of level 6 or equivalent; (iii) the members of the National Council of Justice, the Federal Supreme Court, the Superior Courts, the Federal Regional Courts, the Regional Labor Courts, the Regional Electoral Courts, the Superior Council of Labor Justice and the Federal Justice Council; (iv) the members of the National Council of the Public Prosecutor's Office, the Attorney General of the Republic, the Deputy Attorney General of the Republic, the Attorney General of Labor, the Attorney General of Military Justice, the Deputy Attorneys General of the Republic and the Attorney General's Offices of the General Justice of the States and the Federal District; (v) the members of the Court of Auditors of the Federation, the Attorney General of the Republic and the Deputy Attorneys General of the Public Prosecutor's Office before the Court of Auditors of the Federation; (vi) the presidents and national treasurers, or equivalent, of the political parties; (vii) the Governors and Secretaries of State and of the Federal District, the State and District Deputies, the presidents or equivalent of the state and district bodies of indirect public administration and the presidents of the Courts of Justice, Military Courts, Courts of Accounts or equivalent of the States and the Federal District; (viii) Mayors, Councilors, Municipal Secretaries, Presidents or equivalents of entities of the indirect municipal public administration and Presidents of Courts of Accounts or equivalents of the Municipalities. (ix) persons who, abroad, are also considered PEP: (1) heads of state or government; (2) high-level politicians; (3) holders of government positions at higher levels; (4) general directors and members of the higher levels of the judiciary; (5) senior executives of publicly-held companies; or (6) leaders of political parties. For the purposes of this policy, those persons listed here who have performed, in the last 05 years, the public jobs/functions designated herein, as well as the directors of public law entities, will also be classified as PEP.

Related PEP: PEP by proximity and/or affinity are those that have a significant degree of proximity or affinity with PEP.

SNT: stands for Raízen's Business and Technology Services.

Third parties or "Counterparties": All persons – individuals or legal entities – who have a relationship with the Company, such as a client, supplier, partner, service provider, consultant, power of attorney, in Brazil or abroad.

B. References

- Law No. 9.613/1998, amended by Law 12,683/2012; ("Anti-Corruption Law")
- Law No. 13.260/2016;
- Law No. 7.492, of June 16, 1986 ("Law of Crimes against the Financial System")
- Law No. 9.613, of March 3, 1998. ("Anti-Money Laundering Law")

- Law No. 14.133/21 ("General Bidding Law")
- Law No. 13.303, of June 30, 2016 ("State-Owned Companies Law")
- Decree-Law No. 2.848/40 ("Penal Code")
- Law No. 12.813/2013 ("Conflict of Interest Law")
- Code of Conduct;
- PLT 07 - Credit Policy
- PLT 20 – Compliance Training Management
- PR. JUR. A11 – Counterparty Reputational and Legal Analysis - Trading
- PR. JUR. A15 - Reputational and Legal Counterparty Analysis – Power
- PR. JUR. A20 - Reputational and Legal Analysis of Counterparty – Biogas
- PR. JUR. A14 – Mergers and Acquisitions Procedure – Compliance and M&A
- PR. JUR. B01 – Hiring of Offices and/or Lawyers to Provide Legal Services
- PR. FIN. C05 – Acquisition of Equipment, Materials and Services
- PR. FIN. C06 – Prospecting, Approval and Monitoring of Equipment Suppliers. Materials and Services
- PR. TRAD. A09 – Acquisition of Petroleum Products of Russian Origin