

raízen

# HUMAN RIGHTS DATABOOK



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## 1. Introduction

This databook presents Raízen's key practices and processes to uphold human rights in line with international frameworks such as the UN Guiding Principles on Business and Human Rights. We actively manage our impacts in order to protect rights and prevent and mitigate risks. In doing so, we create opportunities, generate sustainable value, and strengthen our societal and environmental reputation.

## 2. Sustainability Agenda

Raízen's Sustainability Agenda is embedded in our strategic plan and tracked by technical staff that report on progress to the Corporate Social Responsibility Committee, which in turn reports to the Board of Directors.

Raízen approaches human rights in line with internationally recognized best practices, ensuring we respect and protect fundamental rights in our operations, value chain, and communities. The results of our most recent materiality review, as well as the risks and opportunities identified for each topic, can be found [here](#).

## 3. Global Compact and Certifications

We follow best practices and participate in leading global forums. We are members of Instituto Ethos and signatories of the UN Global Compact, and actively engage in initiatives such as Global Compact Brazil's Anti-corruption Collective Action in Agribusiness initiative. We are also signatories of the Corporate Pact for Integrity and Against Corruption, an initiative led by Instituto Ethos in partnership with UNDP, UNODC, the World Economic Forum, and the Brazilian Global Compact Committee, among other initiatives. Our approach is guided by the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.

Our human rights approach has received external recognition through certifications that verify the quality of our processes and good practices in human rights, such as Bonsucro, ISCC EU, ISCC Corsia Plus, and various ISO standards. For more information about our certifications, click [here](#).

## 4. Human Rights

Human rights provide all individuals with the right to dignified life and opportunities, regardless of gender, race, class, language, religion, age, sexual orientation, or any other condition. Food, education, work, health, leisure, and freedom, among others, are examples of human rights established by the **Universal Declaration of Human Rights (UDHR)**, signed on December 10, 1948, when several countries came together to found the United Nations (UN). Comprising 30 articles, the UDHR enforces rights through international treaties and national legislation.

### 4.1 Human Rights at Raízen

At Raízen, promoting and respecting human rights is essential to how we operate. We embed this commitment into all our practices, decisions, and relationships, ensuring that it permeates across our value chain, partnerships, and every stage of our operations. Raízen's **Human Rights Policy** establishes guidelines on respecting and promoting human rights, guiding our actions both in doing business and in our relationships with stakeholders. To access our Human Rights Policy, click [here](#).

### 4.2 Training and Education

In partnership with Instituto Ethos, we have developed a “**Human Rights Learning Track**” for employees that reinforces the importance of human rights and provides information about related initiatives, encouraging employees to work to prevent violations and ensure transparency in upholding these rights. We also offer other learning tracks on our training platform, including: Sustainability, Sustainable Procurement, and Diversity and Inclusion.

At Raízen, integrity underpins all business relationships. Our employees are expected to understand and comply with our **Compliance Policies, Code of Conduct**, and other internal policies. We provide training on our **Code of Conduct, Anti-Corruption, and Antitrust Compliance**, and employees from applicable departments must complete this training within 60 days of joining the company.

## 5. Human Rights Due Diligence

Human rights due diligence is essential for any organization seeking to operate with integrity. We have robust processes in place to identify, prevent, mitigate, and remedy negative impacts from our business activities, and avoid violations.

In the sugar, ethanol and energy industry, human rights due diligence entails assessing risks related to the value chain, workforce, freedom of association, well-being, social and psychological health, occupational safety, discrimination, workplace and sexual harassment, and disciplinary practices. In agricultural operations, where rural labor is predominant, adopting a proactive approach is key to ensuring the rights of all involved are upheld.

We regularly report disclosures outlined in the **European Sustainability Reporting Standards (ESRS)**, including:

- **ESRS S1-3:** Processes to remediate negative impacts and channels for own workforce to raise concerns.
- **ESRS S2-2:** Processes for engaging with own workforce about impacts.

Our approach is based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

## 6. Value Chain

We work with more than 6,000 partners across 24 states who supply materials and services, and around 2,000 contract sugarcane growers in 4 states who supply sugarcane. Each partner is an essential part of our ecosystem, and to provide greater clarity, our policies and procedures outline expectations regarding ethics and transparency in business conduct, all of which are available on our website.

We manage our value chain through our *Raízen Desenvolve* and *Elos Raízen* programs. The *Elos Raízen* program drives continuous improvement in the sugarcane supply chain, with a focus on rural workers' quality of life, environmental preservation, and business prosperity both within and beyond the sugarcane fields. Each program stage is tailored to the specific characteristics of participants.

Our **Procurement** team manages negotiations and commercial relationships with material and service suppliers with support from our **Supplier Journey** program, which guides our partners on best practices at each stage of the supply chain. All negotiations and commercial relationships are governed by our General Terms and Conditions (GTC) or a specific contract, in addition to our Supplier Code of Conduct, Sustainable Procurement Policy, Housing Policy, and Housing Guidelines, which set out, among other requirements, the obligation to commit to respecting Human Rights. *Raízen Desenvolve*

is designed to strengthen and integrate suppliers of all sizes, segments, and locations, supporting their development, best practice adoption, and risk management, in partnership with the Brazilian National Small Business Support Service (SEBRAE).

### 6.1 Impact Assessment

Raízen screens all contract growers as well as material and service suppliers against sustainability criteria. The *Elos* program supports these assessments by providing tailored guidance that considers each supplier's needs and challenges. The program is structured around four thematic pillars: **Human Rights, Environmental Stewardship, Crop Management Practices, and Business Development**. Following an individual assessment, **sugarcane suppliers** participating in the *Elos* program receive guidance from our team of specialists, who recommend strategies and specific activities to be implemented to improve social and environmental best practices.

For the Supply Chain, the first step is **Commercial and Reputational Due Diligence**, which includes: document reviews, reputational, human rights, labor, legal, and financial background checks; completion of questionnaires; and having the supplier sign our General Terms and Conditions (GTC), which govern suppliers' relationship with Raízen.

### 6.2 Monitoring

Within the *Elos* program, technical monitoring is carried out by field specialists throughout the crop year. The number of visits to each property varies depending on the complexity of the activities planned in action plans. The program also undergoes an annual external assurance process conducted by an independent third party—Instituto de Manejo e Certificação Florestal e Agrícola (Imaflora)—to ensure assessment results are transparent and credible

For the **Supply Chain**, suppliers that meet eligibility criteria undergo on-site or online **Process** audits based on ISO 9001:2015, and **Health, Safety and Environment (HSE)** audits based on applicable legislation, Brazilian Regulatory Standards, ISO 45001, and Integrated Operations Management System (SIGO) Element 6 requirements, as described in our Contractor HSE Manual. In addition to the processes described above, suppliers must formally inform Raízen about whether they provide worker housing and ensure that conditions comply with applicable legislation. To ensure compliance with these requirements, Raízen conducts periodic inspections of worker housing. In addition, as part of our Supplier Journey, contractors employing outsourced workers that fall

under high-risk eligibility criteria are included in our Third-Party Risk Management (GRT) process. This involves continuous oversight to ensure that suppliers remain in compliant with labor and filing obligations.

### 6.3 Communication

Human rights are among the pillars of our Elos program, and we recognize the importance of ensuring **decent working conditions** for everyone involved in the sugarcane production chain. Supporting this pillar, we provide our suppliers and their employees with training on compliance with Occupational Health and Safety Regulatory Standards (NR), with the support of local partners such as the National Rural Learning Service (SENAR). In addition, producers receive guidance from our employees on topics such as recording working hours, worker infrastructure, legal requirements for hiring, and requirements related to pay, housing, and transportation. We consider **occupational safety** to be a fundamental imperative for decent work. For this reason, we also work with contract growers to address issues such as fire prevention and response, safe use of agrochemicals and agricultural machinery, proper use of Personal Protective Equipment (PPE), first aid, among other topics.

We also monitor and work to improve people's well-being. An example of this is **Alojar**, a program to maintain best-practice hygiene conditions in worker housing, implemented by residents themselves. To encourage participants to follow these practices, **Alojar** organizes a healthy competition among housing units, and at the end of the program, the participants with the highest scores are recognized and receive prizes. Another key initiative is **Resafra**, which provides training to contractors to reduce risks, improve qualifications in agriculture, and support sector restructuring. The program is led by NGOs Imaflora and Solidaridad, with Raízen as one of the sponsors.

For the **Supply Chain**, ensuring decent working conditions and fair and safe labor relations is embedded in our Supplier Journey. This is supported by communications with suppliers based on performance indicators described in section 6.2. In addition, within **Raízen Desenvolve**, we foster supplier engagement through development programs, training, and educational materials.

## 6.4 Remediation

A supplier's failure to comply with human rights guidelines and expected conduct may result in the application of corrective action plans, replacements, supplier suspension, or, in more severe cases, contract termination.

## 7. Social Performance

### 7.1 Community Engagement

We aim to build transparent, inclusive, and respectful relationships with communities, fostering ongoing engagement and collaboration on initiatives that enhance social welfare and social and economic development in the regions where we operate.

Reporting (fire hotline and "contact us" channels), consultation (reputation surveys), and engagement (meetings with stakeholders) activities are carried out across all operations and duly documented. Specific programs for the development of sugarcane growers and local suppliers, as well as initiatives focused on formal education and professional inclusion, underscore our commitment to human and economic development in the regions where we operate.

### 7.2 Traditional Communities

Respecting human rights, including those of indigenous peoples, is essential for the sustainability of our business and relationships. Our Indigenous Peoples Engagement Policy provides guidance on acting with social and environmental responsibility regarding indigenous peoples and lands, contributing to the quality of life of these populations. Our **Traditional Peoples Committee**, composed of multidisciplinary leaders, acts as an executive body setting operational principles and standards on traditional peoples.

### 7.3 *Na Mão Certa* Program

We are signatories of the Business Pact against Roadside Sexual Exploitation of Children and Adolescents, a fundamental commitment as part of the *Na Mão Certa* program, led by Childhood Brazil. Learn more [here](#). Throughout the year, our fuel distribution bases receive communications to address this issue with visiting drivers.



## 7.4 Major Projects Program

The development of a large project in a given community can alter the local dynamics due to the considerable influx of people into the region. Through Childhood Brazil's **Major Projects Program**, we conduct assessments on child and adolescent sexual exploitation, train local organizations and stakeholders to strengthen the social protection network, and provide training to our employees, partners, and suppliers. The program is currently divided into two main modules: Impact and Protection. The Impact module consists of on-site risk mapping exercises. The Protection module trains construction site ambassadors in the municipalities where our E2G projects are located.

## 8. Employees

Our [Human Rights Policy](#) provides related guidelines with a particular focus on our employees. Among the main topics covered are: "Workforce": including our no-tolerance approach to any form of discrimination, exclusion, or preference based on age, ethnicity, background, skin color, sex, sexual orientation, gender identity, disability, nationality, political opinion, or religion; "Freedom of Association and Collective Bargaining": safeguarding workers' right to associate, join, or choose not to join unions or other organizations of their choice; and "Compensation": with an emphasis on pay equity, ensuring compensation is commensurate with each role, regardless of who performs it.

### 8.1 Well-being, Physical and Psychological Health, and Safety

We are committed to cultivating a culture of well-being, both individual and collective, and fostering a healthy work environment aligned with our values. Raízen believes that well-being is an individual's perception of wellness. Our strategy follows a continuous cycle, organized into three dimensions: **physical, emotional, and financial well-being**

In the **physical well-being** dimension, we provide benefits such as a gym discount program, Raiz Running, telemedicine, awareness and prevention campaigns, medical and dental assistance benefits, the Raízen Ergonomics Program (PROERGO), health check-ups, and Primary Health Care (APS). For **emotional well-being**, we offer programs such as *Raízen Acolhe*, which connects employees and their dependents with a professional team of psychologists, financial consultants, lawyers, and social workers, as well as telepsychology, the *Empresa Cidadã* program, and our Alcohol and Drug Policy

(PA&D). For **financial well-being**, in addition to *Raízen Acolhe*, we offer programs such as a private pension plan, financial education, and a discount club.

## 8.2 Grievance and Whistleblowing Mechanisms

We provide an Ethics Hotline for reporting violations of laws, our Code of Conduct, or any internal policies. The channel is accessible by phone in Brazil at 0800-772-4936, via the website <https://canalconfidencial.com.br/raizen/> or by email at [canaldeetica@raizen.com](mailto:canaldeetica@raizen.com). The Ethics Hotline is managed by an independent firm, ensuring full confidentiality and anonymity of communications. Only after investigation and confirmation are the reports reviewed by the Ethics Committee, which reports to the Audit Committee, in turn reporting to the Board of Directors.

Employees who violate the Code of Conduct or any laws or internal policies are subject to disciplinary measures, including termination of employment. Violations involving third parties may result in termination of the business relationship. Any violation involving a criminal act may result in legal proceedings against those involved.

In November 2021, we established an organization-wide team dedicated to preventing and combating workplace harassment, sexual harassment, and discrimination, with an ultimate goal of promoting a safe and respectful work environment for everyone. In addition to applying expertise and techniques in investigating complaints and recommending disciplinary measures, this team organizes campaigns and initiatives to prevent harassment, discrimination, and violence.

The existence of a dedicated team for preventing and combating workplace harassment, sexual harassment, and discrimination sends a clear message about our commitment to addressing these issues. Investigations are conducted by a trained corporate investigation team, using forensic interview techniques while providing active listening and support, ensuring psychological safety and avoiding re-victimization. Disciplinary measures follow objective criteria established in a matrix. These measures are always validated by at least three executives, ensuring they are applied fairly and impartially and that the whistleblowing channel is effective.

## 9. Diversity and Inclusion

We believe that promoting respect, inclusion, and diversity is a daily effort, and we strive to bring more plurality into our team, enhancing our ability to innovate and grow

as an organization. We value all people, with their diverse visible and invisible traits, multicultural influences, life paths, experiences, perspectives, and potential skills that inspire us daily to practice social coexistence, valuing and respecting the space needed for plurality to thrive. Our [Erro! A referência de hiperlink não é válida.](#) provides guidelines that help us ensure equity and respect for human rights. Applying to all people across all Raízen's businesses and locations, the policy outlines our affirmative-action initiatives aimed at turning challenges into real opportunities, creating equal opportunities for growth and development for everyone. We also support the UN Sustainable Development Goals and work to positively impact society and strengthen our social responsibility. Raízen is additionally a member of affirmative-action forums and initiatives that bring together companies committed to diversity and inclusion in the corporate environment.

## 10. Integrity and Governance

### 10.1 Ethics & Compliance Program

Raízen has an independent Ethics & Compliance Program designed to promote the highest standards of integrity and transparency in our operations. Overseen directly by the CEO, the program strengthens our commitment to ethics and compliance, covering all areas of activity.

The program is based on three core pillars: prevention, detection, and response to misconduct. It follows industry best practices and applicable national and international legislation, such as the Brazilian Anti-Corruption Act (Law 12.846/2013) and other local and global regulations.

### 10.2 Code of Conduct and Ethics & Compliance Program Policies

Raízen's Code of Conduct encapsulates our company's ethical values and principles, serving as a behavioral guide for employees, suppliers, partners, and other stakeholders we interact with—fostering an environment of integrity and responsibility across all areas where we operate. The Code addresses topics such as anti-corruption, the use of confidential information, political contributions, relationships with competitors, and environmental protection. It also reinforces the importance of supporting our communities and creating long-term value.

Our [Integrity Policy](#) is designed to supplement the [Code of Conduct](#) with other compliance principles and guidelines, especially regarding interactions with government

officials. The [Competition Compliance Policy](#) outlines the main provisions of Brazilian antitrust law and guides our employees in acting ethically in their dealings with customers, business partners, and competitors. We also have a Data Privacy Policy that sets guidelines to ensure the proper, secure, and transparent handling of the personal data of employees, former employees, executives, customers, suppliers, and partners to which we have access in connection with our business activities.

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