

Raízen's Policy – PLT.31



Indigenous People Engagement Policy

Objective

To establish general principles, operational guidelines, and standardized key concepts related to engagement with Indigenous Peoples.

Scope

This Policy applies to and shall be observed by all Raízen areas, units, businesses, and functions, and is applicable to all employees, contractors, third parties, and business partners.

Revision

Version	Dates	Changes
V.1	03/09/2022	Initial publication of the Policy
V.2	07/03/2024	General updates

1. Guidelines

Raízen's engagement with Indigenous Peoples and Indigenous Lands shall be guided by the following General Guidelines:

GUIDELINE 1 – Recognize, Respects, and Value the Rights if Indigenous Peoples

1.1 Recognize, respect, and value the rights of Indigenous Peoples, including the right to sociocultural diversity, traditional practices and knowledge, and their relationship with their territories and natural resources.

GUIDELINE 2 – Promote Capacity Building and Continuous Improvement in the Management of Business Activities Involving Indigenous Peoples and Indigenous Lands

2.1 Promote the continuous improvement of engagement with Indigenous Peoples by ensuring appropriate training for employees directly involved with Indigenous-related matters.

2.2 Establish permanent dialogue channels, using appropriate and accessible language, and maintain communication mechanisms that are suitable for engagement with Indigenous Peoples.

GUIDELINE 3 – Act with Socio-Environmental Responsibility Toward Indigenous Peoples and Indigenous Lands

3.1 Consider Indigenous-related matters in decision-making processes regarding new business ventures and the expansion of operating areas.

3.2 Adopt an integrated territorial approach through the mapping of Indigenous Peoples and Indigenous Lands within the areas of influence of Raízen's operations.

GUIDELINE 4 – Foster Free, Prior, and Informed Consultation and Consent Processes with Indigenous Peoples, Where Applicable

4.1 When applicable, observe mechanisms for prior consultation and Free, Prior and Informed Consent (FPIC), ensuring that such processes are conducted by the competent authorities with Indigenous communities, while respecting the specific characteristics of the Company's businesses.

4.2 Whenever applicable, consider the principles of FPIC in engagements with Indigenous Peoples.

GUIDELINE 5 – Contribute to the Quality of Life and Socio-Environmental Well-Being of Indigenous Peoples

5.1 Consider, within Territorial Engagement Plans, the dimensions of quality of life and the socio-environmental aspects of the Indigenous Peoples with whom the Company engages.

5.2 Contribute to the generation of employment and income, partnerships, and projects within Indigenous territories, taking into account Indigenous entrepreneurship and the social, cultural, and economic specificities of the Indigenous Peoples with whom Raízen engages.

GUIDELINE 6 - GENERAL PROVISIONS

6.1 Extend the applicability of the guidelines and engagement approach established in this Policy, where appropriate, to Quilombola and other traditional communities.

6.2 Operationalize the guidelines set forth in this Policy through procedures and practical mechanisms governing the Company's engagement with Indigenous Peoples and Indigenous Lands.

2. Roles and Responsibilities

Social Performance: Ensure governance regarding Indigenous-related matters and provide support to the Business in order to align Company operations with this Policy.

Business, Operations, and Support Functions: Act in accordance with the guidelines established in this Policy and, with support from the Social Performance area, report relevant matters to Raízen leadership and/or the appropriate Company committees.

APPENDIX 01 – DEFINITIONS AND REFERENCES

A. Definitions

Free, Prior and Informed Consent (FPIC): FPIC is the authorization granted by the Indigenous People affected by a company initiative for the commencement and continuation of its activities. It is obtained through prior and informed consultation processes, which enable the exercise of self-determination and the rights of an Indigenous People or traditional community over their lands, natural resources, and knowledge.

Indigenous Lands: According to the 1988 Federal Constitution of Brazil, Indigenous Lands are those traditionally occupied by Indigenous Peoples, permanently inhabited by them, used for their productive activities, and essential for preserving the natural resources necessary for their well-being and physical and cultural reproduction, in accordance with their uses, customs, and traditions. Indigenous Lands are inalienable and non-transferable assets of the Federal Government, and their demarcation process is regulated by Decree No. 1,775 of 1996, which establishes the various stages required for its completion.

Indigenous Peoples: According to the United Nations Declaration on the Rights of Indigenous Peoples, Indigenous Peoples are those who descend from and have historical continuity with populations that inhabited a geographic region at the time of its conquest, colonization, or the establishment of its current borders and who, regardless of their legal status, retain some or all of their own social, economic, cultural, and political institutions and occupy or maintain a relationship with ancestral territories.

Interested Parties, Stakeholders, or Interested Public: Any individual or group that has an interest in the decisions or activities of an organization (ABNT NBR ISO 26000:2010).

Prior Consultation: Prior Consultation is a right of Indigenous and Tribal Peoples, as established by Convention No. 169 of the International Labour Organization (ILO), which determines that communities and peoples who may be affected by a project or decision must be consulted regarding such project or decision in a manner that is free from any pressure or coercion, prior to decision-making, and based on access to relevant information.

Quilombola Communities: According to Article 68 of the Transitional Constitutional Provisions Act (ADCT) of the 1988 Federal Constitution of Brazil, Quilombola Communities are composed of descendants of enslaved Black people who resisted the slavery regime that existed in Brazil until its abolition in 1888. These communities were formed through various historical processes, including escapes to free and generally

isolated lands, acquisition of freedom through inheritance, donations, allocation of land as compensation for services provided to the State, and continued occupation and cultivation of lands within large rural properties, among others. In Brazil, Quilombolas are recognized as "Tribal Peoples."

Traditional Peoples or Traditional Communities: According to Presidential Decree No. 6,040/2007, which established the National Policy for the Sustainable Development of Traditional Peoples and Communities (PNPCT), Traditional Communities are culturally distinct social groups that recognize themselves as such, possess their own forms of social organization, and occupy and use territories and natural resources as conditions for their cultural, social, religious, ancestral, and economic reproduction, using knowledge, innovations, and practices generated and transmitted through tradition.

B. References

This Policy shall be read and interpreted in conjunction with the following Company internal documents, as well as applicable legislation, regulations, and corporate best-practice guidelines:

- Raízen Documents
- Code of Conduct: Ethics at the Core of Everything
- Health, Safety and Environment (HSE) Policy
- Integrity Policy (PLT.14)
- Sustainability Policy (June 2020)
- Social Performance Policy (PLT.10)

External references:

- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP, UN, 2007)
- International Labour Organization Convention No. 169 concerning Indigenous and Tribal Peoples (ILO, 1989)
- Constitution of the Federative Republic of Brazil (1988), particularly Articles 231 and 232 relating to Indigenous Peoples and Indigenous Lands
- Indigenous Statute (Law No. 6,001/1973)
- National Policy for Territorial and Environmental Management of Indigenous Lands (PNGATI, Decree No. 7,747/2012)
- National Policy for the Sustainable Development of Traditional Peoples and Communities (PNPCT, Decree No. 6,040/2007)
- United Nations Guiding Principles on Business and Human Rights (UN, 2011)
- International Finance Corporation (IFC) Performance Standard 7 – Indigenous Peoples (IFC, 2012)
- Bonsucro Production Standard, Version 5.1 (Bonsucro, 2022)

- Global Reporting Initiative (GRI)