

THIRD-PARTY
CODE OF
CONDUCT
RAÍZEN



raízen

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At Raízen, we believe that success is only truly achieved when it is shared with those who grow alongside us. The Third-Party Code of Conduct sets out the principles and expectations that guide honest, ethical, and transparent relationships with our business partners. These guidelines are aligned with Raízen’s culture and values, which are grounded in four core pillars:



We are committed to maintaining a safe environment in our daily practices. Safety is a non-negotiable pillar and receives our full, ongoing attention.



We act ethically, transparently, and respectfully. Integrity is a priority for us and guides all our daily actions and practices.



We act with simplicity and effectiveness to create value.



We believe in collaboration as the foundation for achieving results.

SCOPE

This document consolidates the principles and standards of conduct expected from Raízen’s Third Parties and defines the role they play in fostering responsible, lawful, and sustainable business relationships.

By engaging with Raízen, Third Parties commit to acting in compliance with this Code, applicable legislation, and contractual provisions.

GUIDELINES

Raízen considers full compliance by its Third Parties with the guidelines set forth herein (the “Guidelines”) to be essential, as they form the foundation of our business relationships.

Any Third Party that fails to comply with the Guidelines may be subject to penalties, which may include termination of the contract or relationship without compensation, claims for losses and damages, and other measures provided for by applicable law.

Third Parties must promptly notify Raízen of any changes in their financial condition, inclusion on restrictive or sanctions lists, relevant corporate changes, or any sanctions that may affect the relationship between the parties.

If Raízen becomes aware of any act committed by a Third Party in violation of applicable laws or regulations, Raízen may report such conduct to the competent authorities.

By engaging with Raízen, the Third Party undertakes to:



Allow visits, whether scheduled or unannounced, to assess compliance, performance, safety, and production capacity, and provide all relevant records and information upon request.



Promptly review audit findings documented in the relevant reports, implement the agreed action plans, and comply with all deadlines established for the remediation, adoption, and implementation of corrective measures.





WORK ENVIRONMENT

Human Rights

Third Parties must not use, benefit from or tolerate:

- Child labor,
 - Human trafficking
 - Forced labor, including conditions analogous to slavery
 - Any practice that violates human rights.
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- Third Parties must strictly comply with labor legislation, including, but not limited to, rules related to working hours, compensation, health and safety, and related legal obligations.
 - Third Parties Third Parties must also ensure compliance throughout their supply chain and immediately report any suspected or confirmed violations to Raízen.

Diversity, Inclusion, and Respect

Raízen has zero tolerance for discrimination or harassment. Equal opportunity and fair treatment are essential pillars of fair relationships, and Third Parties are therefore expected to establish and maintain work environments free from any form of discrimination or harassment, adopting appropriate preventive measures to avoid:

(I)

Any distinction, exclusion, or preference based on age, ethnicity, origin, race or skin color, sex, sexual orientation, gender, disability, nationality, political opinion, religion, union membership, or any other characteristic that results in unjustified inequality of opportunity or treatment.

(II)

Abusive, hostile, intimidating, humiliating, or violent conduct that degrades the work environment and causes harm to individuals' physical or psychological integrity.

In addition, Third Parties must respect employees' rights to freely form and join trade unions and to engage in collective bargaining, ensuring that no reprisals occur. Raízen does not tolerate discriminatory, non-inclusive, or disrespectful conduct. Third Parties must ensure a healthy work environment free from such behavior.

Health, Safety and Environment

Raízen considers safety to be one of its most important pillars and expects its Third Parties to provide employees and subcontractors with the highest standards of health and safety, environmental care, and quality of life.

Third Parties must ensure—and be able to demonstrate at any time—that their employees are physically and mentally fit to perform their duties, complying at a minimum with all applicable health and safety legislation and standards. They must also properly manage related documentation and exercise adequate control over activities and operations that may impact the environment or the health and safety of employees and subcontractors.

Proper control over activities and operations includes the implementation of risk and crisis management plans, accident and occupational illness prevention measures, and active health monitoring. This includes, but is not limited to, access to drinking water and sanitary facilities; the provision and use of appropriate personal and/or collective protective equipment; completion of applicable mandatory training; and the regular and adequate maintenance and management of vehicles, tools, and equipment used, ensuring their integrity for the safe execution of activities

The Third Party must immediately notify Raízen of any accidents or incidents, provide appropriate assistance, carry out the corresponding analysis and/or investigation, and cooperate with any analysis and/or investigation conducted by Raízen, in accordance with the practices adopted by the Company.

Raízen understands that it is necessary for its Third Parties to maintain emergency and crisis management plans in their work environments and recommends the adoption of a preventive approach. This includes identifying potential emergency situations in transportation, the workplace, and areas of direct influence; implementing risk-reduction and impact-mitigation measures and establishing immediate response plans.

In the event of the use of controlled products of any nature, the Third Party must hold the required licenses and training and keep all health and safety documentation up to date, as required by applicable legislation and/or by Raízen for the work sites. Safety information related to hazardous and intermediate-hazard materials must be clear, easily accessible, and readily available for consultation..



COMPLIANCE WITH APPLICABLE LAWS, REGULATIONS, AND STANDARDS

Third Parties must comply with all applicable national and international laws, including corporate, tax, accounting, trade, import/export, logistics, sanctions, and embargo regulations.

They must be duly constituted and possess all required licenses, registrations, and certifications. Any event that may compromise legal regularity must be immediately communicated to Raízen.

Sanctions

In all commercial transactions and operations involving Raízen, the Third Party must observe international rules and directives governing import, export, brokerage, financing, trade, logistics, economic sanctions, and embargoes that restrict or prohibit trade with certain countries, entities, or individuals.

Sanctions are legal measures imposed by countries or international organizations—such as the United Nations, the European Union, and the United States—to restrict trade, financial, or logistical relationships with certain countries, entities, or individuals. Such measures may prohibit specific products, restrict methods of payment, block goods, or forbid business dealings with listed parties.

Even when a product is not expressly prohibited, it is necessary to verify the parties involved in the transaction, the transportation process, and the form of payment, as non-compliance may result in fines, suspension or blockage of operations, and other administrative and legal penalties, which may negatively impact Raízen.

The Third Party must report any inclusion on restrictive lists and any violations of imposed sanctions that may negatively affect Raízen.





ETHICS AND INTEGRITY

• Anti-Corruption Legislation

The Third Party must have full knowledge of all applicable Brazilian anti-corruption legislation, including, but not limited to, Law No. 12,846/2013, and must commit to full compliance with such legislation, as well as with applicable international anti-corruption laws.

As a selection and tie-breaking criterion in procurement processes, Raízen prioritizes Third Parties that adopt procedures designed to prevent any conduct or acts that may result in violations of such legislation, particularly those aimed at combating bribery, extortion, kickbacks, or other illegal or fraudulent practices committed against national or foreign Public Administration entities

— Interactions with Public Officials

All contact with public officials must be conducted exclusively by an authorized representative of Raízen and always in the presence of at least one additional representative. Any action carried out on behalf of Raízen before public authorities must comply with the highest standards of ethics and integrity and be formally documented through meeting minutes, including the names of participants, date, time, location, and a summary of the matters discussed.

Raízen cooperates with inspection and regulatory authorities, both domestic and foreign, and expects Third Parties to adopt the same approach. If a Third Party receives any notification from, or is contacted by, a public authority in connection with Raízen, it must immediately inform Raízen's Compliance and Legal areas to obtain appropriate support.

• Conflict of Interests

Third Parties must act in the best interests of Raízen and seek, by lawful means, to maximize the results to be achieved by the parties within the scope of their relationship.

A conflict of interest arises when a person or organization has multiple interests that may interfere with one another, thereby compromising impartiality and decision-making. This may occur, for example, when a Third Party, in order to obtain personal benefit, makes decisions that are not in the best interests of the Company.

By way of example, a conflict of interest may arise from the use of Raízen's assets or information obtained in the course of activities to compete with Raízen or to cause harm to the Company, including the performance of professional activities—even on an informal basis—that have a direct or indirect relationship with companies that compete with Raízen.

Any actual or potential conflict of interest must be disclosed prior to the commencement of the relationship between the parties.

If a potential conflict of interest arises after the execution of the contract, the parties must assess the feasibility of maintaining the relationship. If maintaining the relationship is not feasible, the matter must be addressed through discussions between the parties aimed at evaluating, mitigating, and eliminating the conflict.

Free Competition

Raízen supports and conducts its activities in accordance with the principles of free competition.

Third Parties must comply with all applicable competition laws and adopt ethical conduct, including: (i) refraining from entering into parallel or collusive agreements with competitors; (ii) refraining from improperly influencing the conduct of customers or business partners; (iii) refraining from acting, individually or jointly, to limit or restrict the market entry of third parties; (iv) refraining from abusing a dominant market position to manipulate the market; and (v) refraining from exchanging competitively sensitive information with competitors and/or third parties.



Political Contributions

Third Parties are prohibited from making any political contributions that result in an association with any campaign, action, or initiative of a partisan political nature, whether in the name of, or for the benefit of, Raízen.

If the Third Party chooses to publicly support a candidate or political party, it must inform Raízen, which may issue recommendations and/or require measures to ensure that Raízen's image is clearly dissociated from such initiative.



Gifts, Giveaways & Hospitality

Raízen discourages the offering of gifts, giveaways, and hospitality to its employees by Third Parties.

Third Parties must comply with Raízen's rules and, accordingly, must not offer and/or accept:

- (i) cash or cash equivalents, such as gift cards or instant payment transfers (e.g., Pix);
- (ii) illegal or inappropriate gifts, giveaways, or hospitality that are inconsistent with a professional and ethical work environment;
- (iii) personal services;
- (iv) participation in meals or events without the presence of the business partner;
- (v) gifts, giveaways, or hospitality during contractual negotiation periods or bidding processes;
- (vi) gifts, giveaways, or hospitality involving the same parties on three or more occasions within a one-year period, even if otherwise permitted under applicable policies and procedures.

The offering of gifts, giveaways, and hospitality in the occasions listed must be refused and, if accepted, may be subject to return. Such refusal or return should not be interpreted as a lack of appreciation or politeness on the part of Raízen's employees.

Commissions and Success Fees

The receipt or offering of commissions and success fees by or to Third Parties must be duly agreed upon and governed by a specific contract, with clear and transparent criteria justifying such payments.

Compliance with the contractual criteria will be monitored, and under no circumstances may commissions or success fees incentivize Third Parties to achieve results at any cost or at the expense of maintaining ethical conduct.



CONFIDENTIAL AND PRIVILEGED INFORMATION

• Information Confidentiality

The intentional or unintentional disclosure of confidential or strategic information that is not in the public domain and that has been accessed as a result of the relationship with Raízen is prohibited. Any improper disclosure may give rise to liability.

• Privacy and Personal Data Protection

The Third Party must comply with, and ensure compliance with, the provisions of the Brazilian General Data Protection Law (Law No. 13,709/2018), as well as applicable international data protection laws, ensuring the privacy of information relating to its stakeholders, including customers, shareholders, employees, suppliers, and business partners.

• Intellectual Property, Trademarks, and Social Media

The Third Party may not use Raízen's brand and/or logo, whether owned or licensed by Raízen, in any capacity or medium, including social media, without Raízen's prior, formal, and specific authorization.

ENVIRONMENTAL COMPLIANCE, LAND USE, WATER RESOURCES, AND CLIMATE CHANGE

Raízen believes in and actively promotes sustainable development. Accordingly, full compliance with applicable environmental legislation is a condition of any relationship with Raízen, including compliance with all environmental licenses required for the use of products, provision of services, transportation, operations, and other applicable requirements.

The Third Party must maintain adequate infrastructure for the proper collection, storage, and disposal of solid waste, whether hazardous or non-hazardous, including appropriate signage, covered areas, access restrictions, and secondary containment where necessary.

All waste transported for disposal must be duly registered in accordance with the documentation required by the competent authorities, and the Third Party must ensure that all environmental licenses related to waste transportation are available and valid.

Considering that sugarcane is one of Raízen's most important resources, the Third Party must ensure the traceability of its origin and ensure that land use is carried out efficiently and in full compliance with applicable laws and regulations.



When approached from a broad and long-term perspective, environmental issues drive corporate development and represent an important factor in business competitiveness.

Raízen encourages its partners to adopt measures aligned with the Company's Sustainability Policy. For more information, please refer to the related policies.



RELATIONSHIP WITH COMMUNITIES

Raízen recognizes that its activities may impact the communities and environments with which it interacts. Accordingly, the company is committed to identifying, monitoring, and mitigating potential social impacts affecting these stakeholders. Raízen expects the same standard of conduct and responsibility from its Third Parties.

Third-Party activities related to or arising from contracts with Raízen that have the potential to cause harm to local communities or neighboring populations must be communicated in advance of the commencement of activities. This prior notification is intended to ensure that appropriate mechanisms are established to prevent, address, and, where necessary, repair potential damages in a fair, formal, and transparent manner.

Raízen encourages its Third Parties to have full knowledge of and comply with legislation related to the rights of traditional communities, including Indigenous Peoples and Quilombola communities, particularly regarding respect for their legally recognized territories.

In this context, Third Parties are expected to maintain appropriate and ongoing dialogue with communities within the sphere of influence of their operations and to contribute to local development through coordinated initiatives, including the training, hiring, and utilization of local labor, with the generation of shared value.



MULTIPLIER EFFECT

Raízen recognizes that both its own network and those of its Third Parties are highly pillarized. Accordingly, the company understands that the broader the dissemination and adoption of the Guidelines set forth herein by its Third Parties, the greater the reach and effectiveness of these principles. This cascading effect contributes to the creation of a business environment with an increasingly positive social impact, oriented toward sustainable development and the generation of shared value across the entire value chain.

ETHICS CHANNEL & REPORTING

Any Third Party who, in good faith, is aware of or suspects violations of this Third-Party Code of Conduct or of applicable laws affecting Raízen must report the matter through Raízen's Ethics Channel, which ensures anonymity and is managed by an independent third party. Reports may be made by any individual or entity with a relationship to Raízen or its Third Parties. Retaliation against good-faith reporting is strictly prohibited.

Reports can be submitted by:
Site www.canaldeetica.com.br, by e-mail canaldeetica@raizen.com or by phone.



Brazil: 0800-772-4936



Argentina: 0800-345-1701



United States: 1 (800) 509-4201



Paraguay: 009-800-120-004



Switzerland: 0800-898-773

We also provide exclusive channels for suggestions, criticisms, complaints and to solve any issues involving the company:



SAC **0800-728-1616** and e-mail fale@raizen.com

Ouidoria **0800-717-0010** and e-mail ouvidoria@raizen.com



Integrity Policy

Competition Compliance Policy

Sustainability Policy

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