

Internal Privacy and Data Protection Policy

Purpose

This Privacy and Data Protection Policy for Employees ("Policy") reflects the commitment of Raízen S.A. and its subsidiaries ("Raízen" or "Company") to promote a corporate culture aligned with the General Data Protection Law – LGPD, related legislation, as well as best practices in the processing of personal data.

Scope

This Policy covers all partners, directors, officers, statutory officers, employees, interns, apprentices, and service providers of any nature (individuals not employed by Raízen but with access to its facilities and/or corporate network) who maintain an institutional relationship with Raízen ("Data Subject"). This may include temporary workers hired through temporary work agencies, employees and partners of service provider companies, as well as their guests.

Version Control

Versão	Data	Alterações
V.1	30/06/2021	Original
V.2	09/02/2023	General review
V.3	27/01/2025	General review

Internal Privacy and Data Protection Policy

1. Guidelines

1.1. Collection of Personal Data

Raízen may collect and obtain Personal Data (i) directly from Data Subjects, (ii) during and as a result of the professional activities of Data Subjects, (iii) from legitimate external sources such as suppliers, service providers, and third parties, (iv) from public and/or publicly accessible sources such as the internet, media, public records, and other sources, and (v) as a result of internal and external institutional actions. Policy demonstrates Raízen's commitment to privacy and Personal Data protection, in compliance with applicable legislation. Personal data is processed transparently, securely, and only for legitimate and informed purposes, reaffirming the company's respect for data subjects' privacy.

1.2. Data collected by Raízen

Below are the main purposes for which Raízen may use Personal Data of Data Subjects. The collection and use of information vary according to the relationship between the Data Subject and Raízen and may be limited to specific situations.

- i. Contact information: full name, identification documents (CPF or ID), email, address, phone number, photo, and emergency contact;
- ii. Demographic data: date of birth and gender;
- iii. Sensitive Personal Data: racial or ethnic origin, religious belief, political opinion, union membership or membership in a religious, philosophical, or political organization, health data, sexual life or orientation, genetic or biometric data;
- iv. Identifiers: national ID/passport, citizenship status, residency and work permit status, CPF or other taxpayer/government identification number. When necessary for job performance, full driver's license data, professional registration numbers with competent institutions (such as the Bar Association and engineering councils), and other documents proving job requirements;
- v. Academic, professional, and background information: academic and professional qualifications, resume, academic records, public office experience, credit history, criminal background (depending on the nature of the position), or other information revealed during background checks;
- vi. Information about roles at Raízen: job title/position, workplace, employment contract, hiring date, termination date, performance history, career progression, disciplinary records, training history, leaves, medical leave, accident reports, and vacation records; Personal Data provided

Internal Privacy and Data Protection Policy

directly by you or obtained from other legitimate sources is processed by Raízen for specific and defined purposes. The type and volume of data processed may vary depending on your relationship with the company.

vii. Financial information: bank account, compensation, benefits, retirement plans, bonuses, and other information necessary to manage payroll, record compensation evolution, and applicable taxes;

viii. Video, voice, and image: Raízen may collect and process video, voice, and image data for ID badge creation, access to company facilities and monitoring, as well as for content production for internal and external audiences;

ix. Interactions with Raízen's technology resources: activity logs in systems, devices, and Raízen applications, including emails, messages, browsing, and access logs to buildings and corporate facilities;

x. Preferences and opinions: preference and opinion information provided in internal surveys on various topics.

1.3. Purposes of use

The Personal Data described above will be processed in Raízen's business operations for the following purposes:

i. Internal processes: organization and implementation of recruitment, hiring, transfer, termination, leave, and retirement processes;

ii. Performance and development: recording of performance evaluations and training provided to Data Subjects;

iii. Payment and benefits: payment of compensation and administration of benefits;

iv. Proactive communication: communication with Data Subjects regarding matters involving Raízen and/or related companies;

v. Reactive communication: communication with Data Subjects in response to inquiries and requests;

vi. Technological monitoring: monitoring Raízen's systems and technological resources to ensure information security, protect company and third-party rights and property, improve Data Subject experience, and prevent illegal, fraudulent, or suspicious activities that may cause harm;

vii. Technical support: providing technical and operational support to users of Raízen systems and technology resources;

viii. Content production: production of audiovisual content for informational and entertainment purposes for internal and external audiences;

Internal Privacy and Data Protection Policy

- ix. Internal analysis: conducting audits, research, and statistical studies to monitor the work environment and business development;
- x. Purchases and sales, partnerships, investments: execution of business sales, asset or equity transactions, or formation of partnerships, new companies, and investments;
- xi. Implementation of diversity programs: initiatives aimed at developing a more diverse and inclusive workplace;
- xii. Compliance with obligations: performing activities necessary to fulfill employment contracts, legal and/or regulatory obligations, and requests from public authorities, including compliance investigations;
- xiii. Other legitimate purposes related to Raízen's day-to-day operations, such as planning and managing Data Subject workflows and implementing new projects.

1.4. Data sharing

Raízen may share Employee Personal Data with the following categories of third parties:

- Suppliers and partners: Raízen may share Personal Data with suppliers and partners necessary for its operations, such as benefits providers, data hosting companies, software providers, auditors, and research firms. These partners act under Raízen's direction and are contractually bound to data protection and information security obligations to minimize risks;
- Companies within the same economic group: data may be shared with companies within Raízen's corporate group and/or structure, provided such sharing is necessary for operational purposes, ensuring the same levels of security applied by Raízen;
- Public authorities: Raízen may share Personal Data to comply with legal or regulatory obligations, such as requests from authorities or court decisions;
- Potential partners and buyers: Personal Data may be shared in negotiations involving partnerships, investments, or business disposals, such as with investors, financial advisors, lawyers, or asset buyers.

1.5. International transfers

In cases where Personal Data are transferred to partners and/or third parties located outside Brazil, Raízen will adopt organizational, contractual, and legal measures to ensure that such data are processed

Internal Privacy and Data Protection Policy

strictly for the purposes described in this Policy and that adequate protection levels are implemented to safeguard Data Subject privacy.

1.6. Data retention period

Raízen seeks to minimize the Personal Data maintained about Data Subjects, retaining only necessary information. Records are maintained during the relationship with Raízen and follow the guidelines of PLT.32 – Personal Data Retention and Disposal Policy. After the defined retention period, Personal Data are deleted, retaining only those necessary to meet legitimate interests or legal and regulatory obligations.

1.7. Data Subject rights

Data Subjects may exercise the rights provided in Article 18 of the General Data Protection Law. These rights may be exercised by contacting the Privacy and Data Protection team via email at dpوراizen@raizen.com.

1.8. Amendments to this Policy

Raízen reserves the right to amend this Policy at any time by publishing the updated version in the “Corporate Library” on Raízen’s intranet.

2. Roles and Responsibilities

2.1. Data Subjects

- Ensure that other Data Subjects’ Personal Data are used only for authorized and legitimate purposes aligned with Raízen’s policies and procedures;
- Maintain confidentiality of all Personal Data accessed in the performance of duties, avoiding improper sharing;
- Immediately notify the Privacy and Data Protection team via dpوراizen@raizen.com of any breach of this Policy;
- When applicable, complete training provided by the Privacy and Data Protection team.

Internal Privacy and Data Protection Policy

2.2. Privacy and Data Protection Team

- Update and monitor compliance with this Policy and ensure alignment with current legislation;
- Ensure communication of this Policy to all Data Subjects;
- Receive requests and provide clarifications as provided in this Policy.

2.3. Controls

- Conduct periodic audits to ensure adequacy of privacy practices and propose continuous improvements.

Internal Privacy and Data Protection Policy

ANEXO 01 – DEFINIÇÕES E REFERÊNCIAS

A. Definições

- a. **Data Subject:** partners, directors, officers, employees, interns, apprentices, and service providers of any nature (individuals not employed by Raízen but with access to its facilities and/or corporate network) maintaining an institutional relationship with Raízen. This includes temporary workers, employees and partners of service providers, and their guests, as well as dependents and spouses;
- b. **Company:** refers to Raízen and its controlled entities ("Raízen");
- c. **Personal Data:** any data that identifies or can identify an individual;
- d. **Sensitive Personal Data:** personal data revealing racial or ethnic origin, religious belief, political opinion, union membership or affiliation with religious, philosophical or political organizations, health or sexual life data, or genetic or biometric data related to an individual;
- e. **General Data Protection Law or LGPD:** Law No. 13,709/2018;
- f. **Processing:** any operation performed on Personal Data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation, control, modification, communication, transfer, dissemination, or extraction.

B. References

- Law No. 13,709 of August 14, 2018 (General Data Protection Law – LGPD);
- PLT.25 – Raízen Consequences Policy;
- PLT.32 – Personal Data Retention and Disposal Policy;
- Code of Conduct.

