

RAÍZEN POLICY - PLT 14

Integrity Policy

Review	Date	Changed Items	Developers	Approvers
04	01/31/2023	Full Revision	Lívia Fabor (Comp. Legal Manager) Núbia Oliveira (Compliance Coord.)	Ana Clara Corrêa (Legal, Corporate, M&A and Compliance Officer)
03	07/01/2020	Full review, change of name to “Integrity Policy” and incorporation of PLT.19 - Communication with Government	Natália Simões (Corp. Functions Coord. and Compliance) Victor Briotto (Junior Lawyer)	Pedro Orrico Sandrin (LD Legal Officer, Trading and Corporate)
02	08/30/2019	Full Revision	Paulo Lorite (Corp. Functions Coord. and Compliance)	Antônio Martins (Legal VP and CCO)
01	07/14/2017	Items 1. Introduction; 2. Definitions; 5.3.2. Guidelines; 6. Responsibilities;	Paulo Lorite (Functions Coord. and Compliance) Marco Orosz Senior Lawyer	Antônio Martins (Legal VP and CCO)
00	05/12/2015	Original	Natalia Simões (Corp. Functions Coord. and Compliance)	Antônio Martins (Legal VP and CCO)

1. PURPOSE

The purpose of this Integrity Policy (“Policy”) of Raízen and its subsidiaries (“Raízen”; “Raízen Group” or “Company”) is to provide guidelines to all who have a job, function, position, employment, contractual or professional relationship with the Company, to ensure that business is conducted based on ethics, integrity, transparency and compliance with the provisions of its Code of Conduct, internal policies and rules (“Raízen Policies”) and applicable laws (“Applicable Laws”).

2. SCOPE

This Policy covers all areas, units, businesses, and functions of the Raízen Group and applies to all employees and third parties, in Brazil or abroad.

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

For companies where there are no direct or indirect controlling interests and/or joint ventures not operated by any of the Raízen Group companies, Raízen’s representative in these entities will base his/her actions on the guidelines and principles established in this document.

RAÍZEN POLICY - PLT 14

Integrity Policy

3. DEFINITIONS

Government: cover the bodies and companies comprising the direct administration formed by the entities and bodies of the Executive, Legislative and Judiciary branches, including the Prosecution Office, in all spheres, federal, state or municipal, as well as the bodies and companies comprising the indirect administration, including entities created with their own legal personality to carry out government activities with autonomy and act in a decentralized manner, such as agencies, foundations, regulatory agencies, state-owned company (entity with legal personality under private law, with creation authorized by law and with its own equity, whose capital is wholly owned by the Federal Government, States, Federal District or Municipalities) and government controlled companies (entity with legal personality under private law, with creation authorized by law, as a corporation, whose shares with voting rights belong in its majority to the Federal Government, States, Federal District, Municipalities or entity of indirect administration).

Public Agents: any individual who exercises, even temporarily, with or without remuneration, by election, appointment, designation, hiring, or any other form of investiture or bond, term of office, position, employment, or function in bodies and companies comprising the direct or indirect Administration.

Integrity Audit: is the legal and reputational analysis process of parties, based on information provided and the use of public data search tools.

Gifts: items of low economic value, offered to individuals or Government Agents, whose value must be lower than the amount provided in the Code of Conduct and extensively distributed as a courtesy, advertising, or usual disclosure.

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) / 009-800-120-004 (Paraguay) / canaldeetica@raizen.com.

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

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

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

RAÍZEN POLICY - PLT 14

Integrity Policy

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

Hospitality: service offering or expenses with transport, food, accommodation, courses, seminars, conferences, events, fairs, or entertainment activities, granted by a private agent to a government agent in the institutional interest of the body or entity in which it operates.

Bid(s): means any administrative procedure through which the government selects the best proposal from those offered by the different interested parties, with two purposes: (i) to enter into an agreement and (ii) to obtain the best technical, artistic, or scientific work.

Gift(s): good, service, or advantage of any kind received from anyone who has an interest in the decision of the Government Agent or body in which the Government Agent participates and which does not constitute Gift or Hospitality.

SNT: Raízen Business and Technology Services.

4. INTEGRITY AND COMPLIANCE GUIDELINES

4.1. FIGHT AGAINST CORRUPTION

4.1.1. Interaction with Government and Government Agents

Raízen does not tolerate corruption, whether in the public or private context, which can be extremely harmful to the Company and generate financial and reputational consequences.

When interacting with people who hold positions, whether remunerated or not, in the direct or indirect Administration (“Government Agents”), in any form, on behalf 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 offering/accepting gifts, entertainment, and/or Hospitality to obtain or allow to obtain undue advantage from third parties, whether public or private entities; or
- (iii) use third parties, whether agents, attorneys-in-fact, service providers in general, and/or trade or representative associations to, even if indirectly, offer or accept undue advantages.

RAÍZEN POLICY - PLT 14

Integrity Policy

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

- (i) respect the levels established for Gifts and Hospitality established in our Code of Conduct (available at <https://www.raizen.com.br/sobre-a-raizen/codigo-de-conduta>) (“Código de Conduta”);
- (ii) in case of doubt regarding the acceptance or offer of Gifts, Hospitality, or entertainment, before its effectiveness, a due report must be made in the Compliance Reporting Tool, provided in the Ethics Space or refer to the Compliance Area, by e-mail (compliance.raizen@raizen.com); and
- (iii) upon demand, verify the suitability of the beneficiary of the social performance initiatives of Raízen's Compliance Area, which will also be responsible for formalizing, with the inclusion of a standard Compliance clause, the request, and its respective purpose, according to internal policies and procedures.

4.1.2. Visits, Inspections, and Audits by the Government

Raízen demands and expects that all interactions with the Government and Government Agents occur in an ethical, transparent manner, by the applicable law, and in compliance with the following guidelines:

- (i) the relationship with Government Agents must be ethical, professional, friendly, and transparent, with clear and direct communication, avoiding doubtful interpretations;
- (ii) in the case of communication by e-mail or cell phone, only corporate e-mail or mobile must be used. activities carried out by cell phone must be later formalized by e-mail;
- (iii) meetings with Government Agents must be preceded by an express and clear definition of their agenda;
- (iv) meetings with Government Agents must be held by people 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 authorized by Raízen;
- (v) employees and third parties who have interactions with Government Agents shall keep clear and accurate records (minutes of meetings or written formalization of other types of interaction that lead 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 summary of the matters discussed and any other relevant information. Such records may be produced by the Government Agents with whom the meeting or interaction took place or, failing that, by the employee or third party, and shared with the Government Agents who attended the meeting or with whom the interactions took place, or with the group leader. Such records must necessarily be provided in the appropriate reporting tool on the Ethical Space within fifteen (15) business days;

RAÍZEN POLICY - PLT 14

Integrity Policy

- (vi) In the case of monitoring of Government Agents in inspections and on-site visits, employees and third parties must only provide exclusively technical and operational information, submitting the documents required by the authority under applicable internal procedures;
- (vii) procedures to obtain and renew government licenses, permits, and authorizations must follow a clear and transparent procedure from the competent government agency and must be carried out by people who are up to date with the relevant training(s) on the subject, being expressly prohibited the payment of any fee, for any reason, not provided in applicable laws and regulations, and all inquiries must be answered officially according to our commitments to ethics and Compliance;
- (viii) if the employee understands that the meeting with a Government Agent does not follow the defined agenda or discussions have started on subjects that may generate uncertain interpretation, he/she must ask to record in the minutes their departure from the meeting and withdraw, in addition, to report the event to management and Compliance area;
- (ix) the hiring of any third party to provide services that have as purpose or part of its scope the interaction with the Government and/or Government Agents must be preceded by suitability verification requested by Raízen's Compliance Area, as well as the formalization of a contract with a Compliance clause; and
- (x) meetings with Government Agents shall be held, preferably, at Government offices, during officially announced office hours. If the meetings take place at Raízen's or third-party offices, the Government Agent must be received with the highest standards of ethics and transparency. If the meetings are virtual, the recording may be used as minutes, with the participant's consent, which must be collected at the beginning of the meeting and subsequently recorded in the Compliance Reporting Tool;
- (xi) any type of granting of tickets or invitations to Government Agents in any kind of sports or promotional events promoted or not by Raízen and group companies is prohibited.

RAÍZEN POLICY - PLT 14

Integrity Policy

Regarding the guidelines above, given the recognition by Company of the need for more recurring contacts with the Government in some areas, due to the nature of its activities, such as, for example, RelGov area; Legal, etc., they shall only formalize the interaction report with Government Agents in the indicated channels, if they understand that the interaction represents a risk in terms of their compliance, even in the future.

4.1.3. Hiring Former Government Agents

4.1.3.1. For the Company's Staff, as employees

The hiring of former Government Agents 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 compliance with the quarantine rules of six (6) months, counted from the official dismissal of the Government Agent from the Government, under Law 12,813/13 ("Conflict of Interests Law") and to politically exposed persons ("PPE"), regarding their position.

Employees who have already been hired, identified through the PEP monitoring, and/or who will eventually apply for positions as Government Agents; politicians; elective mandates, remunerated or not, must be reported in the Compliance Reporting Tool, for the assessment of potential conflicts of interest and adoption of any actions to be adopted by the Company to mitigate risks, even potential ones.

Unreported situations may subject the employee to disciplinary actions, as provided in internal policies, in particular, but not limited to the Consequences Policy (PLT 11).

4.1.3.2. As consultants, third parties, and counterparty

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

RAÍZEN POLICY - PLT 14

Integrity Policy

4.1.3.3. Offer and Receipt of Gifts, Presents, and Hospitality 4.1.3 .3.1. If

for/offered by Government Agents

- (i) always be guided by impartiality, transparency, and prevention of conflicts of interest, even if potential;
- (ii) ensure that the Gift, Present, and/or Hospitality offered/received does not constitute an undue advantage;
- (iii) if it exceeds the limit values set forth in the Code of Conduct, obtain prior approval from the Compliance Area for offering and/or receiving Gifts, Presents, and Hospitality directed to Government Agents, which, among other aspects, will assess whether they do not constitute undue advantages, conflicts of interest and comply with the value limits set by applicable law, limits set by bodies and/or entities to which they are bound, as well as this policy and the Raízen Code of Conduct (available at <https://www.raizen.com.br/sobre-a-raizen/codigo-de-conduta>) (“Code of Conduct”);
- (iv) in case of doubt, regarding the acceptance or offer of Gifts, Presents, and Hospitality, before its effectiveness, they must make the appropriate report in the proper tool, available in the Ethics Space or refer to the Compliance Area, by email, compliance.raizen@raizen.com.

4.1.3.3.2. If for/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, Present, and/or Hospitality offered/received does not constitute an undue advantage;
- (iii) take into account local rules and customs when establishing values for offering/receiving Gifts, Presents, and/or Hospitality.

4.2. BIDS

Business opportunities arising from bids, as Law 14,133/21 (“Bids”) shall always be conducted by employees and third parties in strict compliance with the ethical and Compliance parameters established by Raízen’s Code of Conduct; policies and standards; and this Policy, as follows:

- (i) any proposals presented in Bids must follow parameters consistent with the prices practiced by Raízen in situations similar to the current Bid;

RAÍZEN POLICY - PLT 14

Integrity Policy

- (ii) the documents to be submitted in Bids must be previously analyzed by the Legal Department;
- (iii) the formation of consortiums/joint ventures for participation in Bids must be preceded by analysis by the Legal Department. The Compliance Area must conduct a suitability check of the partners/shareholders of the consortium/joint venture members;
- (iv) in meetings with potential bidders, when requested by the bidding entity or for discussion of consortiums/joint ventures, it shall be preceded by a defined agenda and subsequent formalization of the minutes, with the matters discussed and decisions taken in the meeting, observing the obligation of the registration of said minutes in an adequate tool, in the case of administrative agreements, according to the provisions in item 3.1. of this Policy;
- (v) in the case of administrative agreements executed with the Government, after the document is signed, Raízen will adopt measures to monitor and control the execution of the agreement, with the purpose of preventing eventual frauds and unlawful acts; and
- (vi) The hiring of former Government Agents, for technical support in Bids, must be avoided or, when necessary, must 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.

4.3. ANTI-MONEY LAUNDERING AND FINANCING OF TERRORISM

Although Raízen is not required to do so by art. 9 of Law 9,613/98, the Anti-Money Laundering and Financing of Terrorism Law, it takes active steps to ensure that it is not involved in activities that may be deemed as money laundering, and everyone is responsible for ensuring legality and good practices when carrying out financial transactions involving the Company.

4.4. REPUTATIONAL/LEGAL COUNTERPARTY RISK ANALYSIS

The integrity audit is carried out with the purpose of capturing the reputational risks prior to the hiring process, before an agreement or negotiation of any nature is executed, and in accordance with the guidelines of the risk classification methodology established in the Integrity Audit Risk Matrix.

All third-party hiring must be preceded by the process of checking counterparties, to be conducted in accordance with specific procedures, depending on the Business, and its exposure to risk and defined schedule, as applicable.

RAÍZEN POLICY - PLT 14

Integrity Policy

However, some areas have specific policies and procedures, which reference the mandatory demand for counterparty checking, these are:

(i) hirings made by the Procurement area that must follow the flow established pursuant to the Procurement Policy (PLT 02) and the Procurement, Equipment, Materials and Services Procedure (PR.FIN.C05);

(ii) all third-party hiring, which specifically involve interaction with the Government, must be preceded by the procedure for checking counterparties, to be conducted by the SNT area according to the guidelines of the Procurement Policy (PLT 02) and the Procurement, Equipment, Materials and Services Procedure (PR.FIN.C05);

(iii) all the demands for donations, sponsorships and social investments must be preceded by a checking of counterparties, to be conducted by the Compliance Area, on demand, as set forth 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, Acquisitions-Compliance & M&A Procedure (PR.JUR.A14) must be complied together with this Policy.

4.5. SOCIAL PERFORMANCE

All requests for donations, sponsorships and social investments must follow the approvals contained in the Authorities Manual, after checking the counterparties as provided in item 4.5, as well as being formalized in the proper instrument with Compliance Clauses.

No Employee shall make charitable donations and/or conduct any other social performance initiatives, with funds and/or on behalf of Raízen, with the purpose of obtaining undue or personal advantage.

Additionally, employees must ensure that donations and any other social performance initiatives benefit third parties who share and comply with Raízen's ethics and compliance principles.

RAÍZEN POLICY - PLT 14

Integrity Policy

4.6. MANDATORY TRAINING

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

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

Employees who do not attend the Mandatory Training, in due time and according to the established parameters, will be included in a list to be shared with the Raízen Leadership, and will also be subject to interruption of access to Raízen's systems, according to the Access Blocking Procedure - Compliance Training (PRJURA 13).

5. GOVERNANCE

5.1. COMPLIANCE AREA

The Compliance Area is responsible for the implementation and effectiveness of the Raízen Ethics and Compliance Program, in the terms defined by the Committees, as defined in Item 5.2 below.

The duties of the Compliance Area are:

- (i) foster 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) to map the Company's compliance risks, keeping the Committees updated;
- (iv) to propose policies, procedures, and making 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) to develop and manage the Company's Compliance training;
- (viii) to develop internal communications and actions related to Compliance topics;
- (ix) to support the management of the Ethics Channel by Raízen's internal auditors, ensuring the regular investigation of reports, the adoption of disciplinary measures and other measures proposed by the Ethics Committee for embodied reports; and
- (x) to report its activities periodically to the Audit and Integrity Committee.

The Compliance Area is directly linked to the Compliance Officer, who reports to the Vice-Presidency of Legal Affairs, and will be comprised of at least two (2) employees, with exclusive dedication and qualified

RAÍZEN POLICY - PLT 14

Integrity Policy

in the following areas: Legal; Internal Controls and/or Audit. This area will not be, in any case, linked or subordinated to the Company's business areas.

5.2. COMMITTEES

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

5.2.1. Audit and Integrity Committee

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

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 Audit and Integrity Committee is comprised of at least three (3) members, including two (2) independent members of the Board of Directors, and one (1) third member to be appointed by the Board of Directors, in accordance with the requirements of the applicable regulations.

The Committee will meet ordinarily among itself at least every three (3) months or, extraordinarily, whenever necessary, at the request of the Committee's Coordinator or any of its members, subject to the accounting information that must be evaluated by the Committee prior to its disclosure ("Committee Meetings"). Additionally, the Committee shall meet whenever necessary, (a) with the Board of Directors ("Meetings with the Board"); (b) with the Company's independent auditors ("External Auditors" and "Meetings with the External Auditors"); and (c) with the Company's executives in charge of the internal audit ("Internal Auditors" and "Meeting with the Internal Auditors").

5.2.2. Ethics and Leadership Committee

The Ethics and Leadership Committee is a permanent advisory body directly linked to the Company's Audit and Integrity Committee, governed by its Internal Regulations (available at [\(20+\) Workplace Committee Regulations](#)).

The Ethics Committee is comprised of 3 members (Finance VP, People VP and Compliance and Legal VP). The Ethics Committee meets on a monthly basis.

5.2.3. Compliance Committee

The Compliance Committee is a multidisciplinary, permanent body, convened and chaired by the Compliance Manager on a quarterly basis, focused on the foster of ethics and compliance topics

RAÍZEN POLICY - PLT 14

Integrity Policy

in Raízen's business areas, as set forth in its Internal Regulations. (available at (20+) Workplace Committees Regulations).

The Compliance Committee is comprised of up to twenty (20) members, preferably of N3 level, appointed by the Company's Vice Presidents, at the request of the Legal and Compliance VP, representing the business and function areas of the Company.

The meetings of the Compliance Committee take place whenever necessary, and at least four (4) times each fiscal year, preferably on a quarterly basis.

6. REPORT OF VIOLATIONS

Any and all materialized or potential violations of the terms of this Policy, Code of Conduct and other Raízen internal rules, as well as of the applicable law must be reported to the Raízen Ethics Channel at the following sources:

Telephone Service:

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

Switzerland: 0800 898 773

Argentina: 0800-345-1701

Paraguay: 009-800-120-004

Website:

www.raizen.com → About Raízen → Ethics → Ethics Channel

Other Channels:

E-mail: canaldeetica@raizen.com

Or contact the Manager, Internal Audit, Legal Compliance

7. Disciplinary Measures

Employees who fail to 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 its Policy on Consequences and Disciplinary Measures (PLT 25), but also for the sanctions that may be adopted by the Government, in accordance with the law in force.
