

RAÍZEN POLICY

Interlocution with the Public Administration/Public Agents

Review	Date	Altered Items	Developers	Approvers
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1. INTRODUCTION

The execution and daily conduct of Raízen's institutional and commercial interests requires that all Raízen employees maintain contact with Public Agents and Public Administration within the highest level of professionalism, ethics and correctness, in accordance with the laws and regulations, consolidating a sustainable relationship of your business.

The relationship and interaction with any Public Agent must be ethical and transparent, respecting the rules of Public Administration and the principles established by the Raízen Code of Conduct, such as business integrity and compliance, which are among our fundamental pillars.

Violations of the law are not allowed and, even if merely attempted, can configure crimes and lead to the application of fines and penalties to Raízen, generating consequences for its administrators, employees, shareholders and third parties in general.

2. OBJECTIVE

The objective of this Policy is to establish the main guidelines to be observed by Raízen's employees and the Public Administration, directing them on how they should act, recommending objectives and procedures to ensure the updating of their managers and employees ethical and transparent manner, as well as preventing and combating frauds and illicitness.

3. DEFINITIONS

PUBLIC ADMINISTRATION: It comprises the offices and companies that make up the direct administration, which is composed of the entities and offices of the Executive, Legislative and Judicial branches, including the Public Prosecutor, in all spheres, whether federal, state or municipal, as well as the offices and companies that are part of the indirect administration, encompassing entities that were created with their own legal personality to carry out government activities that need to have autonomy and act in a decentralized manner, being these the Autarchies, Foundations, Regulatory Agencies, Public Companies (entity with legal personality of private law, with creation authorized by law and with equity, whose share capital is wholly owned by the Union, the States, the Federal District or by the Municipalities) and Mixed Economy Societies (an entity with legal personality under private law, with authorized creation by law, in the form of a company of anonymous, whose voting shares belong mostly to the Federal Government, the States, the Federal District, the Municipalities or the entity of the indirect administration);

PUBLIC AGENTS: All natural personnel who exercise, even temporarily, with or without remuneration, by election, appointment, nomination, hiring or any other form of investiture or bond, mandate, position, job or function in offices and companies that are part of the Public Administration Direct and Indirect;

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MINUTES OF MEETING: Written record of all events and matters discussed during a meeting or other type of assemblies;

RAÍZEN CODE OF CONDUCT: Means the Raízen Code of Conduct and Business Principles, approved by the shareholders, by the Board of Directors and by the Executive Board of Raízen's companies, available at http://intranet.raizen.com/codigo_etica/default.aspx;

LEGAL DEPARTMENT: Department responsible for legal assistance of Raízen;

AUDIT DEPARTMENT: Department responsible for verifications and investigations of violations of the Raízen Code of Conduct and its policies;

AUTHORIZED EMPLOYEE: Employee who has in his / her job scope the function of relationship with members of the Public Administration and / or Public Agents (Department of Institutional / Government Relations) or, in order to perform their activities, need to routinely interact with the Public Administration, including , but not limited to Petrobras, Caixa Econômica Federal and Banco do Brasil.

QUALIFIED EMPLOYEE: Raízen Employees that have senior management levels, such as Directors and Managers.

MANAGER: A Raízen employee who plays a leading role, usually responsible for planning and directing the work of an individual or group of individuals, monitoring, advising and taking corrective action when necessary, and is also a focal point for reporting any irregularities;

RAÍZEN: Means Raízen Combustíveis SA, Raízen Energia SA and all legal entities in which the aforementioned companies have a direct or indirect shareholding or equivalent, which guarantees them the right to elect a majority of the managers and to define the conduct of the business strategies of the companies. Legal entities; for the purposes of this Policy, all references to "Raízen" included not only the aforementioned legal entities, but also all its directors, officers, managers, administrators and employees who make up the companies;

MEETING AGENDA: Subject or topic to be addressed in a particular meeting, assembly or meeting, generally pre-established and franchised to the participants;

INTERMEDIARY THIRD PARTIES: Any natural person who is not an employee of Raízen, or a legal entity hired by Raízen to act for or on behalf of Raízen;

ANTI-CORRUPTION AND ANTITRUST TRAINING: These are online tutorials or presentational presentations in which Raízen's Legal Department exposes employees to the general guidelines of the company's understanding of certain issues, such as anti-corruption and antitrust policies;

4. GUIDELINES

Relations with Public Agents should always be transparent and impersonal, since they can be considered institutional contacts. The government represents the interests of all those who make up the Country and the representatives of a company speak on behalf of the commercial interests of the organization of which they are part. Therefore, it is important that the contacts are performed by employees who are prepared and authorized for this task, and who must observe the principles and values of the company.

The dialogue should always be with Public Administration interlocutors who have the authority and legitimacy to deal with the issues in question, while the company representatives need to have a good

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knowledge of the legislation in force and provide clear and precise technical information in order to contribute to subsidize the opinions and decisions of Public Agents.

So, in order for a collaborator to participate in any meeting with Public Agents, it is necessary that he have performed the Anti-Corruption and Antitrust Training assigned to his position, preferably in the presential mode, as well as having been previously authorized by the appropriate delegating levels.

5. SCOPE

This Policy covers and must be observed by all areas, units, businesses and functions of Raízen and applies to all its employees, managers, attorneys and agents, including members of Boards of Directors and Executive Boards, as well as Third Party Intermediaries providers that act in the interest or benefit of the Company.

It is also applicable to all companies whose direct or indirect shareholding control is of Raízen, as well as to the joint ventures in which Raízen is formally designated as operator. For companies where there is no direct or indirect shareholding control and / or joint ventures not operated by Raízen, which participate in bids and contracts with the Public Administration, Raízen's representative in these entities should seek to influence the adoption of this Policy or, if it is not possible, of concretely equivalent principles.

5.1 DELIMITATION OF INTERLOCUTORS

It is established by this Policy that all contact with the Public Administration and / or Public Agents will necessarily be done by **Authorized Employee** or by **Qualified Employee**.

Employees with a **level equal to or less than managerial level** may have contact with the Public Administration and / or Public Agents, but **can not assume commitments on behalf of the Company or take decisions in this context**, unless they have been granted specific power of attorney in this regard. Likewise, third parties or agents contracted by Raízen to represent them in any way before the Public Administration can not make commitments on behalf of the company or take decisions in this context, unless they have been granted a specific power of attorney in this regard.

5.2 PRELIMINARY AUTHORIZATION AND REPORTING PROCEDURE

In relation to the procedures that must be observed in the interaction with Public Agents, it is established:

i) that prior to the contact / meeting with the Public Administration and / or Public Agents, the Qualified Employee, the common employee and/or the Autorizes Employee – when appropriate, should report their intention to their Manager, prior authorization and alignment of understandings;

ii) after the contact, the Qualified Employee, the common collaborator should report by e-mail, the content of any and all subjects discussed, indicating the following information: date, place of interaction,, the person with whom he / she interacted, the reason for the interaction, the topics covered, the eventual action taken and the eventual result achieved with the interaction (important to say that employees who do not fit the concept of Qualified Employees will not be able to make decisions and make commitments on behalf of Raízen).

Interactions related to routine activities and operations, such as strictly administrative activities (eg registrations, obtaining licenses, etc.), as well as those performed with Public Agents that are members of the Judiciary Brazil.

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Informal meetings with Public Administration and / or Public Agents (in events such as seminars, congresses for example) also do not need to be reported, however, professional matters of Raízen's interest should be avoided.

prior authorization and report are also not needed for each meeting between third parties or agents contracted by Raízen to represent it in any way before the Public Administration.

5.2.1 AUTHORIZED EMPLOYEES

Prior authorization and report of each meeting between Authorized Employee and Public Agent or Public Administration is not required.

Exception will occur in relation to events appearing on the public agenda of members of the Public Administration (eg Presidents, Governors, Mayors, Secretaries, etc.) or scheduled meetings on issues relevant to Raízen, at which time such meetings should be monthly reported in minutes and filed in repository, as seen in item 6.1.

6. MEETINGS, ACTS AND GUIDELINES

6.1 CORPORATE INSTRUCTIONS FOR MEETINGS

In the course of the meeting, the employee should always act in accordance with the Code of Conduct and ensure that the topics discussed are clear, objective and limited, avoiding the discussion of impertinent, illegal or competitively sensitive information.

In face-to-face interactions between Qualified Employees and / or collaborators with Public Agents or their advisors, it is recommended that Raízen be represented **by at least 2 (two) employees or representatives**.

The employee should then pay attention to the following points:

- discuss only previously submitted subjects - agenda;
- always be clear and specific when speaking, always leaving your statements and settings in context;
- expressly and clearly refuse to give or receive, offer or solicit, even if not consuming the actual payment or receipt, directly or indirectly through the intermediation of third parties, any cash value or any other form of advantage for personal benefit of the agent involved and / or third party indicated for the respective receipt, whose purpose is an improper or inappropriate result, which would not occur if it were not for bribery, including, for example, the granting of favors, entertainment, travel, lodging, discount, reimbursement, gift or any other form of advantage;
- refuse to share competitively sensitive information, in line with the provisions of our Competitive Compliance Policy - PLT.17, disclosed on the intranet, making it clear that our Compliance Policies prohibit this type of information sharing;
- when a minute is drawn up, ensure that only the topics actually discussed at the meeting are included, and it is prudent to obtain the signature of all those present;
- obtain a copy of the Minutes.

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6.2 GUIDELINES AND REGISTRATION

Guideline and Minutes of meetings are fundamental to allow the transparency and registration of the subjects discussed and to ensure that no illegal or improper behavior is unduly attributed to any Raízen employee.

Accordingly, after having participated in a meeting, pursuant to item 5.2 (ii) above, the Qualified Employee and / or the ordinary employee shall report to the respective Manager the content of the meeting and shall present, whenever possible, the respective Minutes of the meeting. Both actions should take part in within a maximum of 5 (five) days of the event.

After the report of the meeting by the employee, the Manager shall review the description and may:

- i) approve the descriptive and send to the Legal Department for final file, along with the other documents of the procedure, with the indication 'ARCHIVING';
- ii) disapprove the description and send all documentation to the Legal Department with the indication 'FOR ANALYSIS', in order to evaluate potential risks assessed.

In case the employee understands that the meeting did not follow the Agenda or in it started a discussion of subjects that may generate uncertain interpretation, he should withdraw from the meeting, making, whenever possible, the Minutes of the withdrawal, and, online with item 5.2 (ii), should immediately report this event to your Manager and the Legal Department by email.

In this last case, the Legal Department will take the appropriate measures according to the case.

Minutes and other documents related to this Policy will be stored in a network folder of the specific sharepoint area, under the control of the Legal Department, and that it will be possible to perform a backup by Raízen Information Technology Department.

The submission of minutes and documents to the Legal Department should be done by the email integridade@raizen.com.

If there is any doubt regarding this storage procedure, the Legal Department should be consulted.

7. REPORTING VIOLATIONS

Any violation of this Policy must be reported through one of the Raízen Compliance Communication Channels (Ethics Channel: 0800-772-4936 or canaldeetica@raizen.com), and / or directly to the Audit Department.

Raízen will not tolerate any type of retaliation against any person, internal or external, who communicates in good faith a violation or suspected violation of any legal norm or item of its Code of Conduct, including this Policy.

8. POLICY INOBSERVANCE

Raízen does not admit the practice by its employees or their representatives of any kind of illegal conduct. Its prohibited to offer, promise, delivery or acceptance, directly or through third parties, of economic benefits or undue advantages of any kind to Public Agents as a way of facilitating business, omitting acts or obtaining benefits for Raízen, such as obtaining permits, licenses, permits and certificates;

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It is not allowed to practice or contribute to the practice of acts that may be considered harmful to the public interests and Public Administration.

In addition to the training given periodically to its employees, the Legal Department is available to clarify any doubts, seeking a quick solution to mitigate or eliminate possible conflicts and / or risks.

Any employee of Raízen who does not comply with the provisions of this policy, and does not follow the procedures and requirements set forth herein to carry out interactions with Public Agents, or not complying with legal and regulatory provisions herein, shall be subject to sanctions, ranging from warnings to dismissal and, if applicable, to the confrontation of civil and criminal accountability processes.

Negligence and voluntary failure are considered noncompliance with this policy and the Code of Conduct, being subject to the application of disciplinary measures provided in internal regulations to its employees.

Regarding third party representatives of the Company, noncompliance situations with this Policy will lead to the termination of the contract, as well as the management of a eventual lawsuit for damages, without prejudice to other legal provisions.

9. RELATED DOCUMENTS

This Policy should be read and interpreted in conjunction with the following documents:

9.1 BRAZILIAN AND FOREIGN LEGISLATION:

- United States Foreign Corrupt Practices Act (FCPA);
- UK Bribery Act 2010;
- Código Penal Brasileiro;
- Lei de Licitações e Contratos Administrativos - nº 8.666/1993;
- Lei de Improbidade Administrativa - nº 8.429/92;
- Lei de Conflito de Interesses - nº 12.813/13;
- Lei de Responsabilização Administrativa e Civil de Pessoas Jurídicas - nº 12.846/13.

9.2 INTERNAL RULES

- Code of conduct;
- Institutional Relationship Policy - PLT. 03;
- Social Performance Policy - PLT. 10;
- Anti-Corruption Policy - PLT.14;
- Competitive Compliance Policy - PLT. 17.