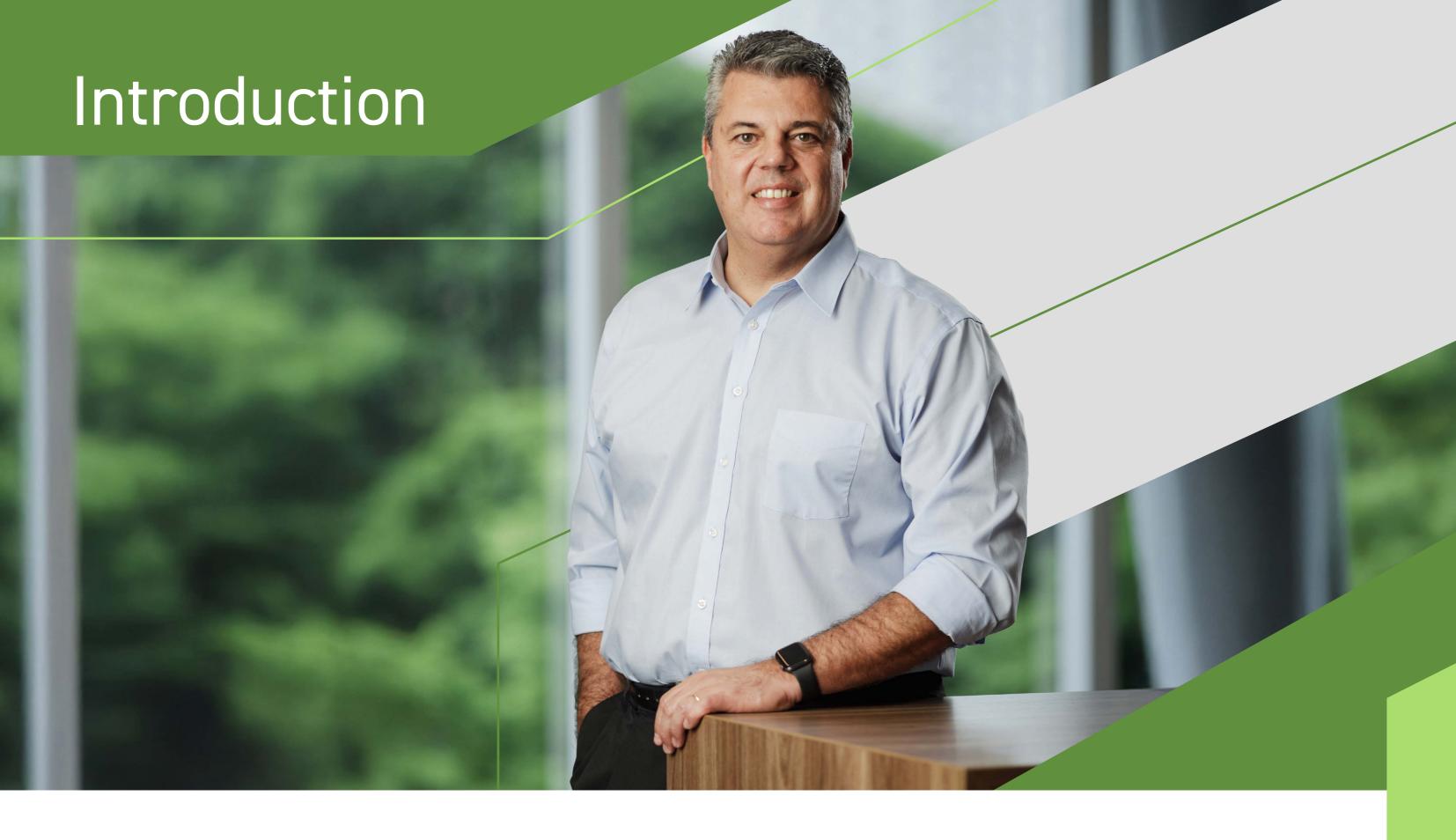
CODE OF CONDUCT raízen

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CODE OF CONDUCT

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Dear Employees,

We are pleased to present to you the new version of our Code of Conduct.

This document reflects the values we share, the respect we cultivate in our relationships, and the commitment we uphold to ethics and integrity.

More than just a set of guidelines, this Code is a guide that reinforces our culture and directs our daily choices. Here you will find principles that strengthen trust and ensure our fair and transparent conduct with all stakeholders.

We count on your engagement to put these values into practice, maintain open dialogue, and make our conduct an example both inside and outside Raízen.

Whenever you have doubts about how to act in a specific situation, this Code is your starting point.

If you wish to clarify a conduct matter or need support, please contact the Compliance Department at: compliance.raizen@raizen.com.

Enjoy your reading.

Nelson Gomes CEO of Raízen

This Code of Conduct applies to all employees of Raízen and its subsidiaries. Employees include directors, statutory officers, board members, committee members, employees, and interns.



Raízen's culture is built on four pillars: Safety, Integrity, Simplification, and Collaboration.



Safety

We promote a safe environment in our daily practices. Safety is a non-negotiable pillar and receives our full attention in daily operations.

- We lead by example: we identify risks, ask for help when needed, act or report to our leaders and/or communication channels when necessary.
- We build a safe environment by demonstrating our commitment through continuous decisions and practices.



Integrity

We act impartially, follow established rules, and if we notice anything wrong, we report it to our leaders and/or specific channels.

- We act impartially, follow established rules, and if we notice anything wrong, we report it to our leaders and/or specific channels.
- Respect is the foundation of any interaction, and we make decisions that align with the organization's values.



Simplification

We do what creates value in a simple and effective way.

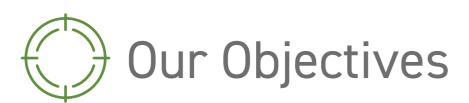
- We focus on what matters, challenge complexity, and eliminate what does not generate value, working in a simple and effective way.
- We communicate clearly and directly, leaving no room for misinterpretation.



Collaboration

We are making efforts to achieve results.

- We combine strengths to generate greater impact, trust in each other's capabilities, and build together in a complementary way, without internal competition.
- We prioritize "we" over "I", valuing Raízen's success above the interests of specific areas or individuals.





Deliver satisfaction and value to our customers and partners.



Generate sustainable returns for **shareholders**.



Develop and recognize our **employees.**

Duties and Responsibilities of Employees

We must all:

- Follow the guidelines of this Code, applicable laws and regulations, Raízen's internal policies, procedures, and standards.
- Act ethically, with integrity and responsibility.
- Safeguard our own **safety** and that of our colleagues.
- Protect Raízen's image and reputation.
- Promote Raízen's culture and values.
- Report illegal acts and violations of this Code, laws, and company policies.
- Complete mandatory training and obtain necessary certifications (<u>Raízen University</u>).
- ✓ Use Raízen's resources responsibly and be accountable in an ethical manner.
- Protect Raízen's information and preserve its confidentiality.





Leader role

Raízen employees in leadership positions are responsible for disseminating our culture, serving as role models, and promote mechanisms to support compliance with the rules and guidelines set out in this Code.





Compliance with Laws and Regulatory Standards

Raízen complies with and respects national and international legislation, industry-specific regulations, internal standards and policies, as well as the provisions set forth in this Code of Conduct.

In all business transactions and operations involving Raízen, we must also observe international standards and directives regulating import, export, brokerage, financing, trade, logistics, economic sanctions, and embargoes that prohibit unrestricted trade with certain countries, entities, or individuals.



Accounting Records and Financial Information

Raízen records its financial and accounting information in an accurate and transparent manner, in accordance with applicable accounting regulations, and strictly meets tax obligations. Financial controls are rigorous, and the company promptly informs the market of material facts. In addition to these controls, we have processes aimed at preventing financial fraud.



Safety is a fundamental pillar of Raízen's culture. We promote initiatives to maintain the physical integrity and health of our employees through programs and preventive measures focused on health, safety, and well-being.

We must:

- Prioritize the **physical integrity and health** of our employees, adopting measures to maintain safe and adequate work environments in compliance with applicable regulations.
- Prohibit the use of alcohol and illegal drugs within our company and strictly forbid performing activities under the influence of substances that may impair performance or the safety of our professionals and third parties.

- Continuously improving our safety practices by conducting incident investigations, audits, and inspections with a **focus on continuous learning.**
- Consistently comply with all safety regulations and procedures, use Personal Protective Equipment (PPE) whenever necessary, and strictly follow established procedures.
- Offer ongoing training to keep the safety culture alive and adopt measures to certify that all our professionals are **well-informed and prepared** to act correctly and responsibly.
- Encourage active participation of our employees in safety committees and voluntary initiatives, promoting a safer and more collaborative work environment.
- Prioritize partnerships with third parties that share these guidelines.



Learn more by accessing the Internal Occupation Health Policy on Alcohol and Drugs.



We all have a fundamental role in promoting workplace safety. We must be proactive in protecting ourselves and our colleagues.

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Business Integrity

Operate in full compliance with laws, regulations, and internal guidelines, ensuring transparency and accountability in our actions, while also influencing our sectors to adopt the highest ethical standards, which include responsible governance practices and anti-corruption measures.



Operational Excellence

We strengthen safety, high socio-environmental performance standards, and the preservation of human rights through proper working conditions in our value chain. In this pillar, we promote dialogue with surrounding communities while valuing the development of people and their diverse perspectives so that everyone finds their place to lead.



Climate Change

Our commitment lies in optimizing greenhouse gas (GHG) emissions and strengthening decarbonization policies, encouraging the transition to a low-carbon economy.

The integration of Sustainability topics into Raízen's code of conduct is addressed and described throughout this document. In this regard, everyone at Raízen plays a key role in implementing our policies and procedures, as well as our culture.



Learn more by accessing the Sustainability Policy and the Integrated Report.

We must:

- Comply with all environmental legislation applicable to our business sectors in Brazil and in the countries where we operate.
- Report to our leadership any work that poses a risk of environmental or community incidents.
- Minimize environmental impacts by adopting practices that **provide sustainable benefits** to the company and the environment.

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Workplace and Human Rights



Raízen promotes and encourages harmonious, respectful, and inclusive coexistence in the workplace at all its facilities. Behaviors that violate the physical and psychological integrity of our employees are strictly prohibited.

Our company firmly combats violence, discrimination, and harassment, adopting strict measures to maintain a healthy work environment.

We do not tolerate:

- **Discrimination based** on age, disability, ethnic origin, marital status, gender, sexual orientation, physical appearance, nationality, political views, religion, ideology, pregnancy, social background, or other characteristics protected by law.
- Abusive and repeated behaviors that destabilize our professionals.
- Moral harassment, such as public humiliation and unfounded criticism.
- Any **unwanted and non-consensual sexual** conduct that disturbs, constrains, or affects sexual freedom, typical of sexual harassment.



Human Rights

Raízen is committed to protecting human rights in all its operations, following national and international standards such as the Universal Declaration of Human Rights, the UN Guiding Principles, the ILO's Fundamental Labor Standards, and the OECD Guidelines for Responsible Business Conduct.

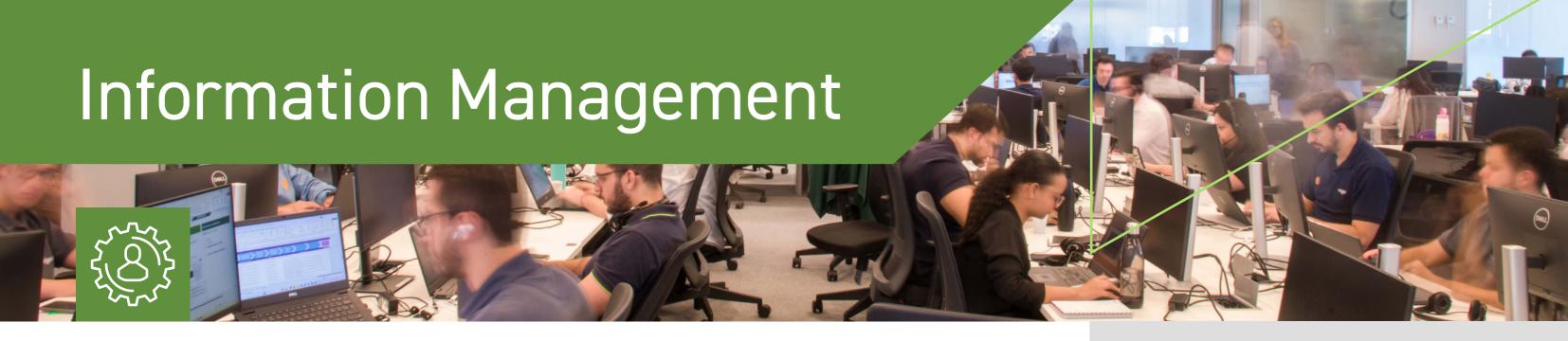
Our company has a zero-tolerance policy for any form of forced labor, child labor, or human trafficking. We support the development of surrounding communities through social responsibility initiatives in education, social inclusion, and citizenship. We respect the rights of indigenous peoples, quilombolas, and other traditional communities, especially regarding land use and natural resources.

Freedom of Association, Contributions, and Political Party Participation

Raízen supports the right to free association, collective bargaining, and the formation of unions by employees. Our company does not participate in, contribute to, or support any political party. We respect employees' personal political opinions, provided they are not associated with Raízen or expressed in our facilities. If an employee wishes to run for public office, they must inform their manager and the Compliance Department in advance.



To learn more, access our <u>Human Rights</u> and <u>Indigenous Peoples Policy</u>.



Public Communications on Behalf of Raízen

Press Relations

Raízen's relations with the press are handled exclusively by the Corporate Communications area. Only spokespersons appointed and trained by this department may grant interviews on behalf of Raízen.

Investor Relations

Communication with investors must be carried out exclusively by company professionals authorized by the Institutional Relations area.

All public communications on behalf of Raízen, including presentations and lectures, must be previously approved by the Corporate Communications area and carried out only by employees authorized in advance.



Raízen's official social media channels are coordinated and managed by the Corporate Communications and/or Marketing areas of our company or its subsidiaries, following best ethical and integrity practices. It is very important to be cautious when posting topics involving Raízen on personal social media accounts to avoid misinterpretation or reputational risks to the company.

Best Practices:

- The creation of profiles, pages, or groups representing the company must be **approved and managed** exclusively by the Corporate Communications area.
- Employees may share, on their personal accounts, content published on the company's official channels, such as campaigns, news, social actions, and institutional communications.
- When sharing official company content on a personal profile, it is important to **keep the content faithful to the original post**, without edits, alterations, or added comments that may create doubts, misinterpretations, or harm the company's reputation.
- Sharing screenshots, edits, or montages of internal communications is prohibited, even with good intentions, as **they may compromise the context and clarity** of the message.

Important:

Posts on social media, including messaging apps, with racist, homophobic, discriminatory content, or attacks on underrepresented groups are not "personal opinions" but crimes. Any discriminatory behavior or incitement to hatred will be treated seriously. We are committed to ensuring an inclusive and respectful environment, including in digital spaces.

- Do not post or share company-related content that may be considered offensive, discriminatory, defamatory, or that violates copyright laws.
- It is forbidden to disclose **confidential information**, **business strategies**, **customer data**, or any internal content without authorization.
- Maintain **respectful and professional behavior** when interacting with colleagues, clients, and the public on social media.
- Do not share images or videos revealing the company's internal environments, unreleased products, or sensitive information.
- The publication of images related to the company must be **previously approved** by the Corporate Communications area.
- If you find criticisms or complaints related to the company on social media, do not respond directly forward the situation to the Corporate Communications area, which will handle it appropriately.

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Industrial and Intellectual Property

Raízen protects its industrial and intellectual assets. All developments created in the course of our duties belong to Raízen. These assets include industrial, intellectual, and commercial information, processes, methods, strategies, projects, market or technical data.

It is forbidden to disclose such information without a prior confidentiality agreement.





Confidential and Inside Information

Inside Information

Inside information refers to relevant, confidential, and exclusive data that may have a significant impact on the company's share price. Such information is accessible only to a restricted group of individuals, usually due to their role or position within the company. Examples include undisclosed financial results, upcoming mergers and acquisitions, new product launches, and other matters that may significantly influence the company's perception, results, and/or business. The use of inside information for trading company securities—whether intentional or not—is illegal and strictly regulated to ensure fairness and integrity in financial markets.

Misuse of such information is a crime, and employees who do so will be subject to disciplinary, civil, and criminal measures.

It is forbidden to leak or send inside or confidential information to unauthorized individuals, in strict compliance with securities market regulations (CVM Resolution No. 44).

Confidential Information

We must protect non-public information accessed as part of our activities at Raízen. Such information may relate to prices, profits, suppliers, partners, clients, benefits, employees, operational data, etc.

These matters are confidential and may only be shared in accordance with Raízen's internal policies and procedures.



Learn more by accessing the <u>Information Security</u> <u>Policy.</u>

It is also prohibited to trade any class of Raízenissued securities for personal or third-party benefit when the price was influenced by inside information.

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Personal Data Protection

Raízen, as a controller and processor of personal data, complies with the General Data Protection Law and other applicable privacy and data protection laws and guidelines in each country where it operates.

This includes the protection of personal data of employees, customers, and third parties. The personal data processing cycle begins with collection, continues with usage, and ends with disposal.Personal data must be deleted after the end of its processing, in accordance with Raízen's data retention and disposal policies, as well as specific privacy and protection policies for employees and customers.





Use of Assets and Electronic Communications

Use of Assets

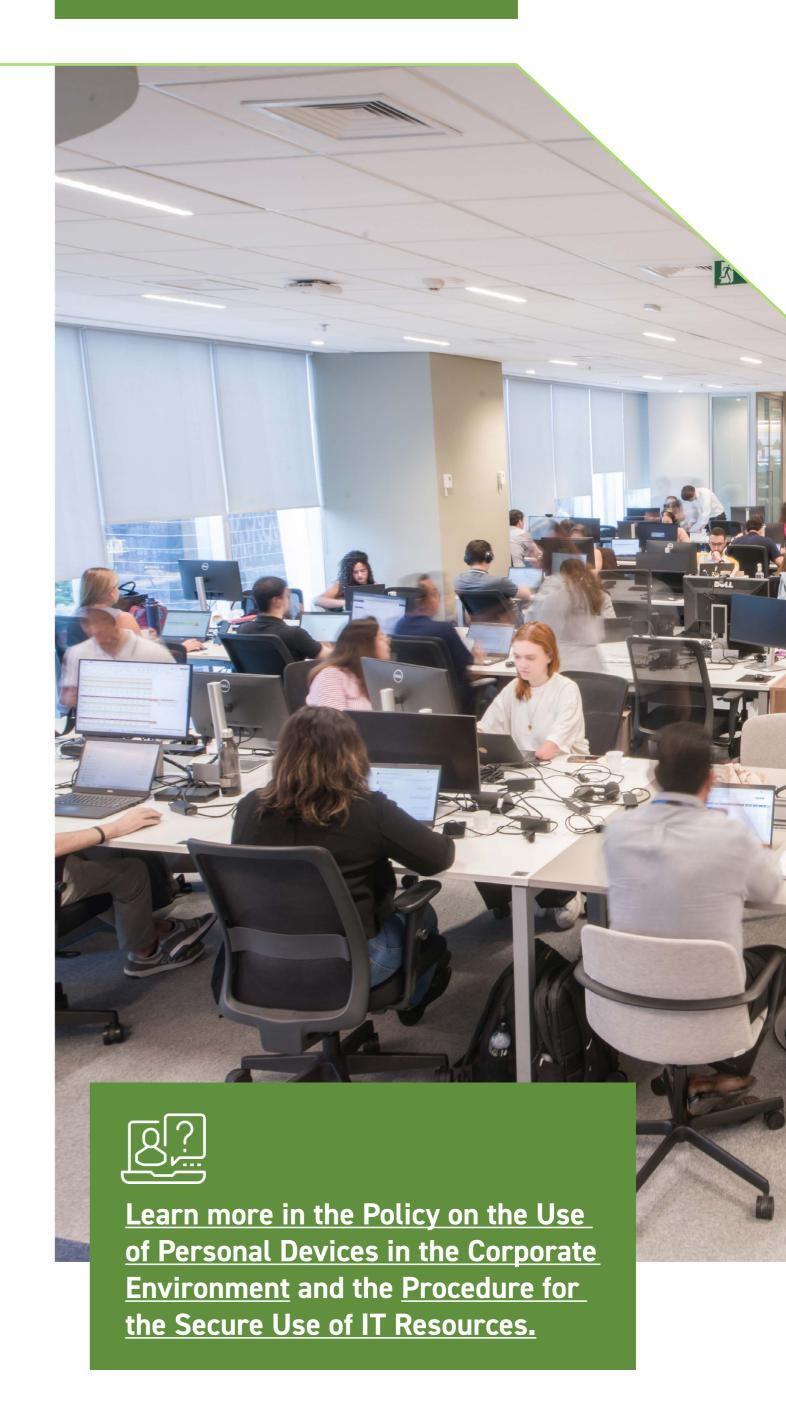
Raízen's assets such as buildings, facilities, equipment, tools, computers, vehicles, cell phones, materials, and technologies—must be preserved and protected.

IT equipment provided by Raízen, such as computers and mobile phones, must be used only for work purposes, avoiding any personal use that could compromise security. It is prohibited to use Raízen's systems improperly, and only software approved by the company's technology area may be installed. Remember that IT equipment is Raízen's property and must be preserved and used responsibly and in moderation.

Access to Electronic Information

Raízen monitors and controls the use of corporate systems and applications, including emails or any other form of electronic communication and data storage. The information generated and stored in these communication media and systems is the property of Raízen, which may access all content produced or shared. Employees should not expect privacy when using these systems.

Attention! It is forbidden to share Raízen's system access credentials or passwords.







Customers

Our company treats customers fairly and transparently, conducting every business in line with our values and delivering high-quality products and services.



Our base of suppliers and partners consists of companies that share the same principles of ethics and integrity and that adopt responsible policies and practices. We recognize the importance of having solid partners who comply with legal, social, and environmental responsibilities and, above all, have a safety culture and practices.



Competitors

Our company respects and complies with competition laws, operating ethically and fairly. We do not engage in any action that restricts competitiveness, such as price-fixing or market-sharing agreements, and always preserve the independence of our resellers, distributors, and partners.

We prohibit any agreements, measures, or coordinated practices among competitors, customers, suppliers, consumers, distributors, or resellers that may restrict or aim to harm competition.

We provide exclusive channels for suggestions, feedback, reports, and for addressing any issues involving the company.

SAC

0800-728-1616

e-mail fale@raizen.com

Ombudsman

0800-717-0010

e-mail

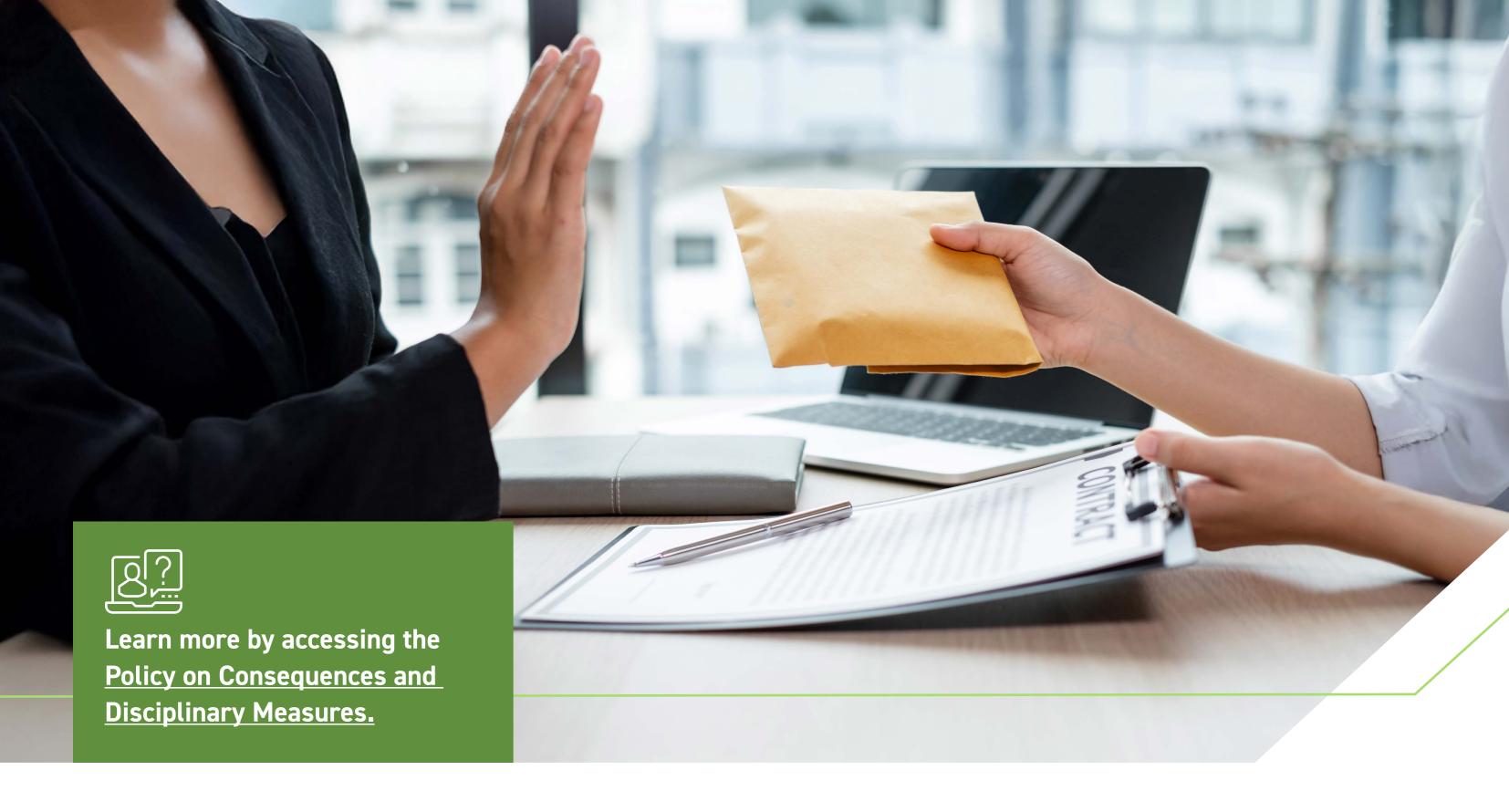
ouvidoria@raizen.com

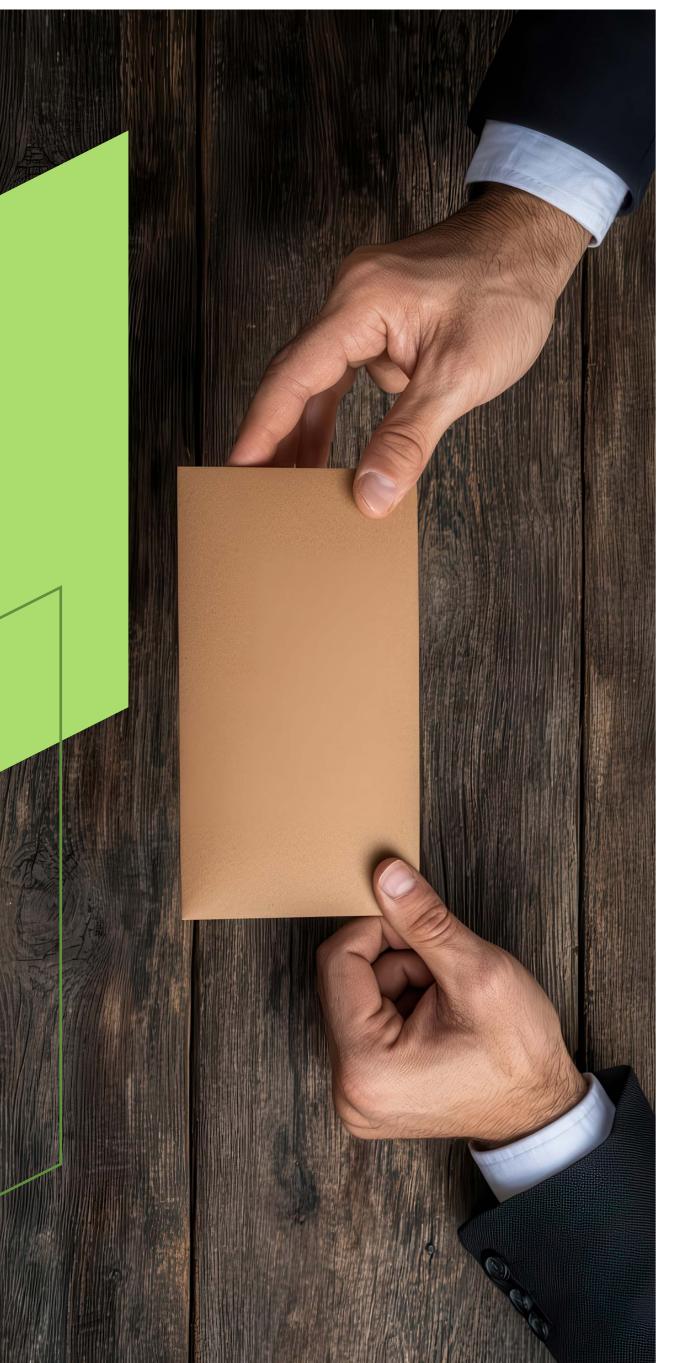
Ethics Hotline

0800-772-4936

e-mail

canaldeetica@raizen.com



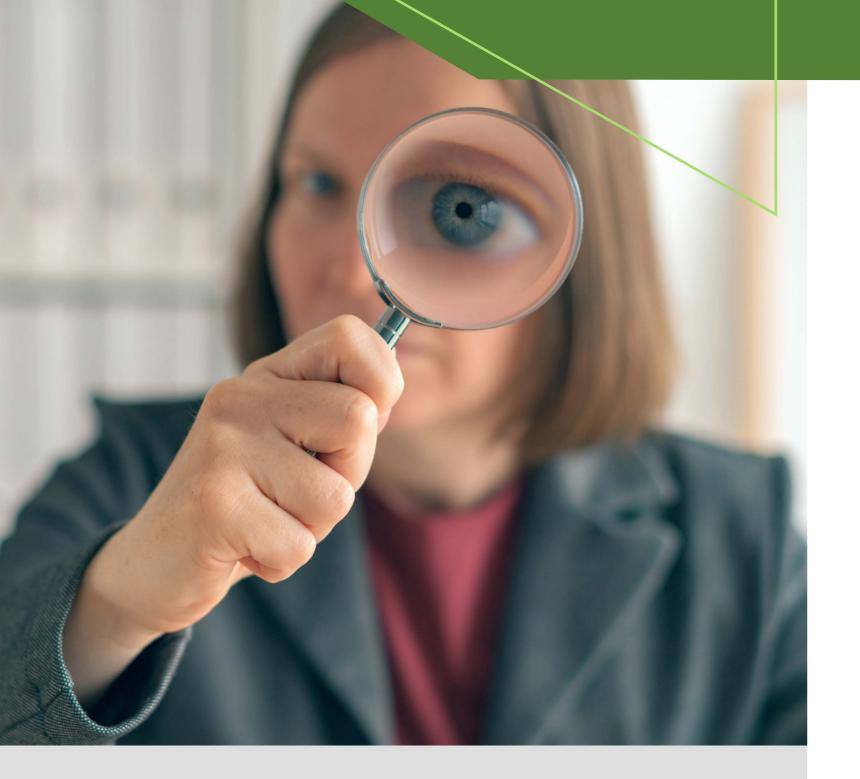


Anti-Corruption and Bribery Prevention Practices

We conduct our operations and transactions in compliance with the Brazilian Anti-Corruption Law No. 12,846/13, the Administrative Improbity Law No. 8,429/92, Law No. 14,231/21, and other related laws in the countries where we operate, such as the FCPA (Foreign Corrupt Practices Act) and the UK Bribery Act. Before carrying out any operations, as set out in our processes, we conduct due diligence to verify compliance with ethical and legal principles throughout our value chain.

If any operation is suspected of irregularities, it must be immediately suspended, and, if necessary, disciplinary measures will be taken. Additional controls may also be implemented to prevent recurrence. Suspicions or reports of fraud, administrative misconduct, and corruption, when applicable, must be forwarded to the competent authorities. All of our company's activities whether conducted directly or through third parties must be completely free from corruption and bribery.

We do not tolerate, under any circumstances, corrupt practices such as giving, receiving, offering, or promising anything to unduly influence actions or obtain unlawful advantages, whether involving public officials or private entities.



We repudiate any involvement in money laundering or terrorism financing activities. We must promote mechanisms so that all financial transactions are legal and follow good governance practices, applying strict controls to combat these illicit activities. If any operation is suspected of irregularities, it must be immediately suspended, and, if necessary, disciplinary, civil, and criminal measures will be taken.

Anti-Money Laundering and Counter-Terrorism Financing Practices

Money laundering is a crime that may involve concealing or disguising the nature, origin, location, disposition, movement, or ownership of assets, rights, or values obtained—directly or indirectly—from illicit sources; using illicit resources to acquire assets or invest in activities with a lawful appearance; or assisting, participating in, or facilitating the laundering process.

Terrorism financing involves providing, collecting, or making available—directly or indirectly—financial resources or assets with the intent that they be used to carry out terrorist acts, or knowing they will be used for such purposes, even if the acts do not occur.

Know Your Customers, Partners, and Suppliers

Before establishing any relationship with third parties, we subject the counterparty to Raízen's value chain onboarding process, which includes due diligence to identify and avoid reputational and legal risks, such as cases of corruption, legal proceedings, conflicts of interest, involvement with public officials, among other essential as a means to support contracting integrity.

Our partners must also undergo the approval process and adhere to the Third-Party Code of Conduct.



During the relationship, we conduct continuous checks and, if we detect any irregularity or change from the initially provided information, the counterparty will be questioned so that corrective measures can be taken.

Conflict of Interest

A conflict of interest occurs when a person or organization has multiple interests that may interfere with each other, impairing impartiality and decision-making. This can happen, for example, when an employee has a personal matter that could influence their professional responsibilities, leading to decisions that are not in the best interest of the company or other involved parties.

Personal interests must never conflict with those of Raízen.



In case of a potential conflict of interest, report immediately to management and enter it into the Compliance Reporting Tool by completing the Conflit of Interest form.



- Maintaining a **personal (romantic) relationship** or having **family ties** with other Raízen employees without reporting it to leadership and in the Compliance Reporting Tool.
- Having a **personal (romantic) relationship** or **family ties** with employees of other companies that have business relations with Raízen.
- Having a **personal (romantic) relationship** or **family ties** with employees of competing companies.
- Having a **personal (romantic) relationship** or **family ties** with public officials or Politically Exposed Persons (PEPs).
- Using Raízen's assets or information obtained in the course of duties to compete with or harm the company.
- Making investments that allow influence or participation in competing commercial activities.
- Being a partner or even informally a shareholder in third-party companies that do business with Raízen.
- Being a partner or even informally a shareholder in competing companies or in businesses that conflict with your role at Raízen.
- Performing professional activities—even informally—that are directly or indirectly related to **Raízen competitors**.
- Carrying out parallel activities that **compromise Raízen's reputation** and integrity.

Interpersonal relationships: Refers to the interaction and connection between two or more people. This exchange can occur in various contexts, such as the workplace, within the family, among friends, in the community, or any other social group. It is characterized by the presence of bonds, closeness, and emotional connection, and can be found in various forms, such as friendships, family relationships, and marriages.

Degrees	Relatives
1st degree	Parents and children
2nd degree	Grandparents, grandchildren, siblings
3rd degree	Uncles, nephews/nieces, great-grandparents, great-grandchildren

First-degree relatives by affinity not limited to: stepfather, stepmother, stepchildren, son-in-law, daughter-in-law, fatherin-law, and mother-in-law.



Interactions with Related Parties

Commercial transactions between related parties are common in business. Related parties include individuals or entities with a direct or indirect connection to Raízen, such as controlling shareholders, family members of executives, and associated companies.

These transactions must follow market conditions, be transparent, and always serve Raízen's best interests. They are subject to internal policy and additional approvals to avoid conflicts of interest. Refer to the Conflict of Interest and Related Party Transactions Management Policy for details.

Public dealings and bids



Any contact with a public official must be made only by a trained employee or an authorized representative of Raízen and always in the presence of at least one more employee/attorney. Meetings with public officials must be recorded in the Compliance Tool by completing the Conflict of Interest Form, including participants' names, date, time, location, and a summary of topics discussed.

Raízen fully cooperates with inspection authorities, both national and foreign. No employee should obstruct the work of these authorities. If an employee receives a notification or is contacted by a public entity, they must immediately inform the Compliance and Legal areas for support.





Bidding process

Opportunities for business in public tenders and competitive bidding processes must strictly comply with Law No. 14,133/21 (Public Procurement Law), this Code of Conduct, and Raízen's policies and procedures, with review and support from the Legal and Compliance areas. No violations of procurement law will be tolerated, such as bid rigging, contract fraud, price fixing, disrupting the bidding process, among other crimes set out in the law.

Public Administration: encompasses the bodies and companies that make up the direct and indirect administration, consisting of entities and bodies from the Executive, Legislative, and Judiciary branches, at all levels, as well as entities such as autonomous agencies, foundations, regulatory agencies, public companies, and mixed-capital corporations. Public Officials: any person who, even temporarily, with or without remuneration, holds a mandate, position, job, or function in bodies and companies that are part of the direct or indirect Public Administration.

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The offering of gifts, giveaways, and hospitality for legitimate business purposes between Raízen and private companies is permitted, provided they follow the rules set forth in Raízen's Integrity Policy.

e must not accept gifts, giveaways, or hospitality if we believe the intent is to influence—or appear to influence—our decisions. All offers or receipts of gifts, giveaways, and hospitality must be reported in Raízen's Compliance Tool. Offering cash or cash **equivalents** is not permitted.

Cash-equivalent gift: PIX, transfer, and gift card.

The offering and receipt of gifts and giveaways are subject to the limits established in the company's Integrity Policy and are only allowed upon proper

registration in the compliance reporting tool. If a gift or giveaway exceeds the value limit set in the Integrity Policy, it must be returned to the giver with a thank-you note and an explanation of Raízen's policy. If returning it is not possible, it must be reported in the Compliance Reporting Tool, and the item will be allocated to Raízen solely for donation to institutions or for raffling among employee.

Gifts, giveaways, and hospitality involving our company, employees, and public officials are prohibited.

Offers or receipt of hospitality, regardless of value, must follow specific policies and be reported in the Compliance Tool for prior evaluation and authorization.

For more information, refer to the <u>Integrity Police</u>.

Giveaways are items offered to promote a brand, product, or service, often distributed at events, fairs, conferences, or directly to consumers. Gifts are higher-value items with a more personal nature compared to giveaways.

Hospitality refers to the practice of receiving or offering services related to tourism, events, and hospitality, such as tickets to shows, races, movies, theater, accommodations, trips, airline tickets, or social gatherings in restaurants.



Donations and Sponsorships

Donations and sponsorships are permitted under limited circumstances, following the guidelines of the Social Performance Policy and corresponding procedures. Our company requires that these actions comply with local laws and be approved by the Private Social Investment Committee.

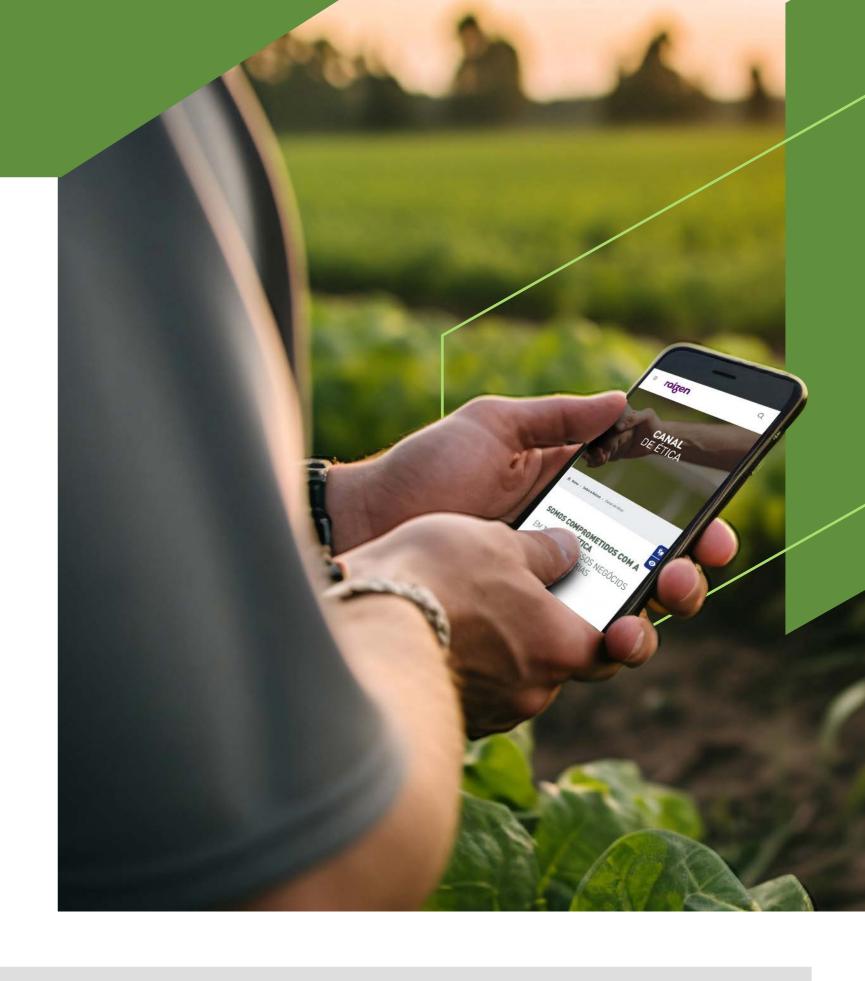
All requests for donations, sponsorships, and social investments must follow the required approval levels and include verification of the individuals or organizations receiving support.

Ethics Hotline

The Raízen Ethics Hotline is available to receive reports or suspicions of illegal and/or unethical conduct.

If we become aware of or suspect violations of the Code of Conduct—such as fraud, corruption, bribery, discrimination, harassment, conflicts of interest, and other illegal and/or unethical situations—the Ethics Hotline is the company's official tool for receiving such reports.

We operate the Ethics Hotline through an independent company, ensuring confidentiality, non-retaliation, and the possibility of anonymous reporting. All reports are treated confidentially and must be made responsibly.



To report violations of the Code of Conduct, internal policies, or legislation, access the **Ethics Hotline** through the following channels:



Brazil 0800-772-4936



Argentina

0800-345-1701



Paraguay 009-800-120-004









Consequence Disciplinary Management

We do not tolerate misconduct.

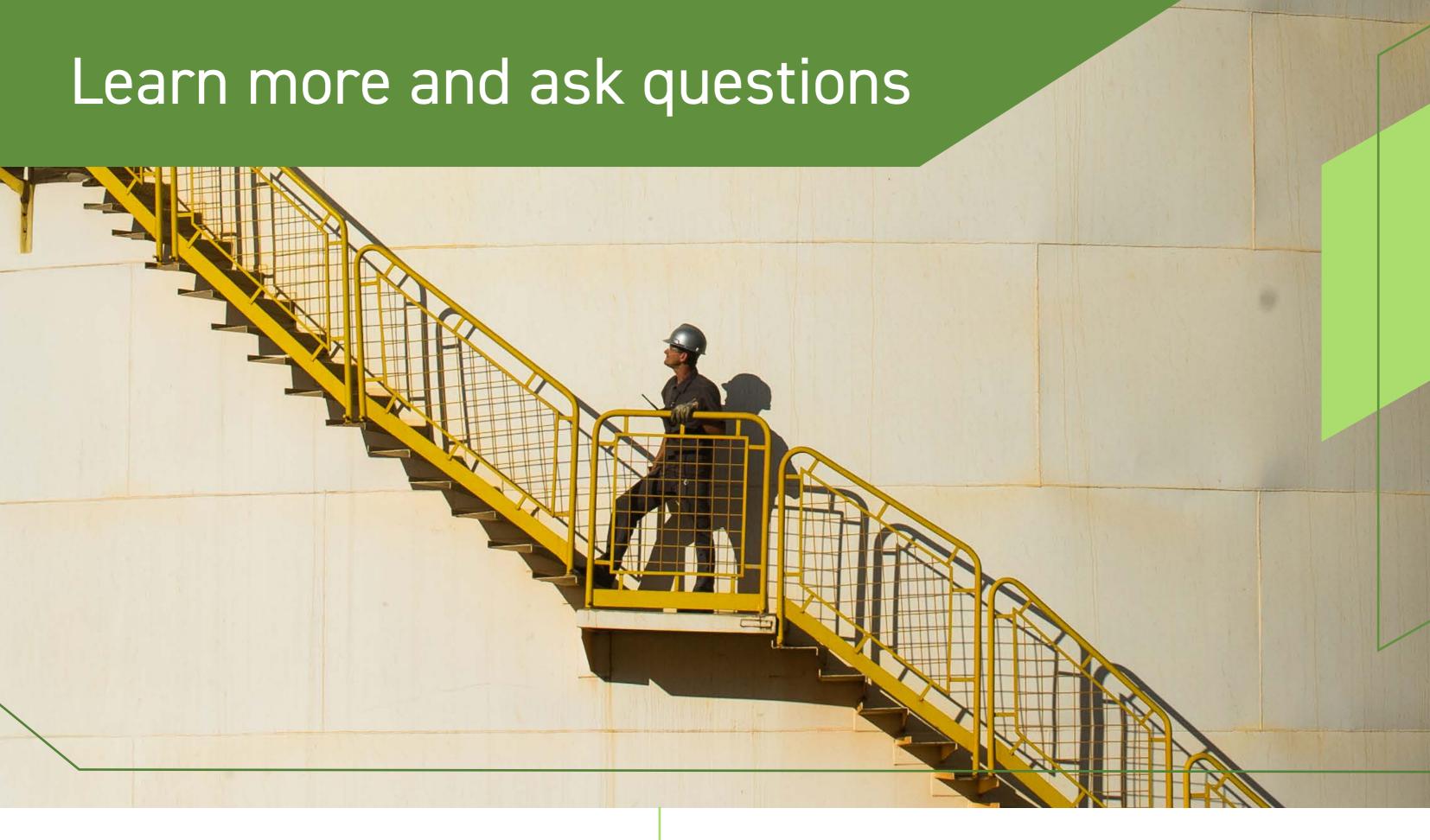
Failure to comply with the provisions of this Code, laws, or internal standards will result in the application of disciplinary measures.

These measures may include verbal or written warnings, suspension, and more severe consequences such as dismissal for just cause, termination of the employment contract, reimbursement for damages caused, and notification of the facts to the competent authorities.



Those responsible will also be subject to administrative, civil, or criminal proceedings, depending on the severity of the conduct. The rules of applicability and examples of inappropriate behaviors can be found in the Consequence Management and Disciplinary Measures Policy.

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The Raízen Compliance Department is responsible for the implementation, review, updating, operation, and monitoring of the ethical guidelines in this Code of Conduct, as well as maintaining the Compliance Program. The area operates autonomously and independently, with guaranteed access to information and documents from other areas necessary to perform its duties.

We have a multidisciplinary Ethics Committee responsible for deliberating on cases of illegal conduct covered in this Code and internal policies. We recognize that our business is dynamic and are prepared to adapt our guidelines as new situations arise. Therefore, this Code will be reviewed whenever necessary.

The Compliance Department is available to all employees to provide further details on this Code's provisions and related policies.

References

- Health and Safety EHS
- Integrity Policy
- Consequences Policy and Disciplinary Measures
- Competition Compliance Policy
- Performance Social Policy
- Sustainable Supply Policy
- Privacy and Personal Data Protection Policy
- Information Security Policy
- Human Rights Policy
- Indigenous Peoples Engagement Policy
- Alcohol and Drugs Policy
- Conflict of Interest and Related Party Transactions
 Management Policy
- MOA
- Secure Use of IT Resources Procedure
- Use of Personal Devices in the Corporate Environment Policy (BYOD)

These policies are available in the Raízen Corporate Library.

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