

## **STANDARDS & PROCEDURES**

### **Human Rights Policy**

#### **1. OBJECTIVE**

This policy establishes the general guidelines and principles for Rumo's business with regard to Human Rights, which should guide all of its activities and relationships.

#### **2. SCOPE & DURATION**

This policy is applicable to Rumo and its units as from **May 30, 2022**.

#### **3. GUIDELINES**

We have built a large company based on solid values. We believe that respecting and promoting Human Rights are essential for conducting our business activities.

Rumo, through its Code of Conduct, establishes the rules of conduct expected from all professionals and requires all employees to complete training courses on the topic via its internal system. Rumo's Code of Conduct reflects its dedication to achieving its goals by adopting the highest moral and ethical standards, supported by three key pillars: respect, transparency and integrity.

The Company also maintains an Ethics Channel to receive reports of any deviations in conduct by telephone (0800-725-0039) or email ([canaldeetica.com.br/cosan](mailto:canaldeetica.com.br/cosan)).

#### **4. INTERNATIONAL STANDARDS**

Our commitment is to respecting Human Rights in accordance with international standards, such as:

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Universal Declaration of Human Rights

United Nations Guiding Principles on Business and Human Rights

Global Reporting Initiative (GRI)

United Nations Global Compact

## 5. DEFINITIONS

**Employees:** all persons with a work relationship with the Company governed by its bylaws or by labor laws. Employees include members of the Board of Directors, Audit Board, Statutory or Non-Statutory Committees, Statutory Board of Executive Officers, as well as contractors, temporary workers, interns and apprentices who are minors.

**Third Parties:** our clients, business partners, agents, attorneys-in-fact, subcontractors and suppliers of goods and services, whether direct or indirect.

**Human Rights:** a set of rights established by the nations through the Universal Declaration of Human Rights aimed at promoting dignity, freedom, equality and the inherent value of each person, which in Brazil is corroborated by the Federal Constitution of 1988.

**Universal Declaration of Human Rights:** document establishing the measures to enshrine the basic rights for a dignified life. The purpose of this Declaration is to ensure human rights to all citizens of the world.

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**United Nations Guiding Principles on Business and Human Rights:** document created to guide governments and companies on better managing the risks related to violation of human rights.

**Global Reporting Initiative (GRI):** international organization of independent standards that helps companies, governments and other organizations to understand and communicate their impacts on issues such as climate change, human rights and corruption.

**United Nations Global Compact:** initiative of the United Nations (UN) to engage companies and organizations in adopting ten principles in the areas of human rights, labor, environment and anticorruption.

**Rumo Code of Conduct:** sets out the guidelines of conduct expected from all employees and third parties.

**Sustainability Policy:** policy created to establish the strategic guidelines for guiding actions based on relevant aspects related to sustainability, as well as consolidate sustainable business management and culture practices.

**Anticorruption Policy:** policy that sets out the guidelines to be followed by Employees and Third Parties for complying with national and international Anticorruption Laws.

## 6. INTERNAL DOCUMENTS

Rumo Code of Conduct:

Sustainability Policy

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Anticorruption Policy

Risk Management Procedure

Private Social Investment Policy

Trem do Bem Procedures

Policy on 7 Life Rules

### **FORCED AND CHILD LABOR AND HUMAN TRAFFICKING**

Rumo prohibits the use of child labor and does not condone any practice analogous to forced labor, human trafficking or any form of modern slavery. The Company is committed to establishing efforts to ensure that our operations are free of these practices, whether involving our employees or our service providers.

### **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Rumo reaffirms its support for fundamental labor rights and recognizes the rights of all employees to the freedom of association and collective bargaining with trade unions, in accordance with local legislation. Rumo supervises its service providers and requires them to respect freedom of association and collective bargaining for their Employees.

### **NON-DISCRIMINATION**

We respect the human rights of each person and do not tolerate any kind of discrimination based on race, color, religion, gender, ethnic background, age, physical or mental condition or any other kind of discrimination that denigrates the dignity inherent to each person. Rumo is committed to guiding and supervising its service

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providers to adopt a proactive role in practicing nondiscrimination both inside and outside its facilities.

## **HEALTH AND SAFETY**

To Rumo, safety goes beyond protecting people to building a collaborative and inclusive workplace, which is why we set out Internal Rules and Standards to uphold a safe workplace in all aspects. RUMO is committed to training, awareness raising and supervision with regard to safety rules in all workplaces involving rail and terminal operations. Complying with these rules is mandatory for all persons, irrespective of their position or work area at Rumo.

## **LABOR CONDITIONS**

People are our most valuable capital, which is why treat our Employees fairly and honestly. Rumo is committed to complying with all labor and collective bargaining laws applicable to its employees and service providers. All employees are protected by employment agreements with all conditions agreed upon admission, with the company maintaining instruments to ensure for all employees and third parties due legal compliance, including with regard to labor conditions. Everyone at Rumo is responsible for reporting any deviations to ensure a dignified and safe workplace.

## **ETHICS CHANNEL**

Our Ethics Channel is available to our people as well as the public. The channel is an important communication tool for answering questions and receiving suggestions, as well as for registering any reports of improper, irregular or unethical business

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conduct, discrimination, questionable practices, violations of internal controls, audits, or any violations of the Law or of the Code of Ethics.

The Ethics Channel is managed by an external company, which guarantees anonymity for the whistleblower and confidentiality of the information reported. The channel is available via the internet ([canaldeetica.com.br/cosan/](https://canaldeetica.com.br/cosan/)) and telephone: 0800-725-0039. The external company classifies and submits the reports to the Company for due treatment.

### **RELATIONSHIP CHANNEL**

Rumo makes available a relationship channel for handling general requests, complaints, reports and various services. The information included on the form is forwarded immediately to the applicable areas based on the respective subject.

The information registered is received by an independent and specialized company to ensure total confidentiality and proper treatment of each situation without any conflict of interests. Reports can be made via the internet (<https://canalconfidencial.com.br/rumo/>) or by telephone (0800 701 2255), with service available 24/7.

### **COMMUNITY RELATIONS**

With the mission of causing positive impacts in local communities, the Rumo Institute encourages people to continue their education and expand significantly social and productive inclusion of youth, while respecting individual talent and the region's socioeconomic vocation.

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We also work through our volunteer program Trem do Bem, which draws on its collaborative network to offer financial guidance and organize volunteer actions led by employees.

Drawing on tax incentives, we also invest in various initiatives to benefit local communities. In accordance with our Private Social Investment Policy, our strategy was designed and is revised when applicable based on a good understanding of the context and challenges of the local public, and aligned with the business and the Sustainable Development Goals (SDGs).

### **EVALUATION OF HUMAN RIGHTS**

Rumo adopts a rigorous process for contracting service providers, whether when approving new companies or conducting monitoring during the validity of the contract. We analyze legal compliance and respect for collective norms, as well as issues related to workplace health and safety.

If any signs are identified of the use by service providers of labor conditions analogous to slavery, Rumo maintains the right to suspend activities or to immediately terminate the contract, under the contractual conditions. The same applies to situations of noncompliance with legal requirements that, during provision of services, could affect the health and safety of the Company's employees, the environment, the community and society in general.

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Our Compliance, Legal and Internal Controls areas are responsible for disseminating the Company's Integrity culture. As part of our approach to training on Ethics and Compliance, we take measures to ensure that our anticorruption policies, standards and procedures are communicated to all Employees. Specific actions with third parties include continually strengthening Due Diligence procedures. All our contracts with Third Parties now include clauses requiring respect for human and social rights and compliance with national and international laws.

**7. REVISION AND APPROVAL**

<b>Name</b>	<b>Position</b>
Daniely Silva Andrade	Sustainability Manager
Fernanda Verzenhassi Sacchi	People, ESG, PPF & Communication
Valter Pedrosa Barretto Junior	Chief Legal Officer
Felipe Bertoncello Carvalheda	Chief Procurement Officer
Carlos Fabrício Pinto Vargas	Internal Controls Coordinator