

## STANDARDS AND PROCEDURES

### Sustainability Policy

#### 1. PURPOSE

This Policy establishes the strategic guidelines to guide actions based on significant aspects related to sustainability, as well as consolidate sustainable business management and culture practices.

#### 2. SCOPE AND VALIDITY

The sustainability guidelines in this Policy apply to all employees and contractors, clients, suppliers, communities and society and other stakeholders of Rumo and its Subsidiaries, Co-Subsidiaries and Affiliates, starting from **August 12, 2021**.

#### 3. CONSIDERATIONS

##### 3.1 Definitions

- **Value Chain:** represents the activities performed by an organization - from suppliers, production cycle to final distribution.
- **Employees:** every person with a statutory or employment relationship with the Company ("Employees"). 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 minor apprentices are also Employees.
- **Sustainable Development:** the capacity to meet the needs of the present without jeopardizing the capacity of future generations to meet their own needs;
- **Diversity and Inclusion:** refers to combining the different and complementary perspectives for all profiles and as a way of including, ensuring that everyone has access to the same development opportunities.
- **Governance:** defined by mechanisms or principles that guide the decision-making process in companies, involving ways of preserving and optimizing resources, all of which contribute to the management and perpetuity of an organization.
- **Impact:** repercussion or effect of an action, which could be positive or negative, resulting from the activities of an organization.

Circulation or disclosure of this document is restricted to Group companies and employees.  
External disclosure is prohibited, unless expressly authorized by Internal Audit.

## STANDARDS AND PROCEDURES

### Sustainability Policy

- **Greenhouse Gas (GHG) Inventory:** it is one way of identifying the sources of greenhouse gas emissions from a company's activities and quantify them in order to control and monitor annually its emissions.
- **Environment:** it is the set of physical, chemical, biological and social elements that may cause direct or indirect effects on living beings and human activities.
- **Mitigation:** action to soften or reduce the impacts or effects of an event or situation.
- **Stakeholders:** investors, own employees and contractors, suppliers, clients, regulatory bodies, communities and society.
- **Natural Resources:** elements available in nature that can be used by human beings to meet the development needs of society.
- **Social:** refers to the adoption of voluntary practices and actions to promote the health and well-being of society and internal public, considering the interests of the parties and seeking sustainable development while reducing the impacts of its operations.

### 3.2 Guidelines

To build a sustainable environment, it is necessary to strike a balance among the Environmental, Social and Governance pillars. Encouraging ecoefficiency, social responsibility, sustainable economic development and transparent management of corporate governance are subjects that guide the strategy and perpetuity of Rumo.

The commitment to education for sustainability aims to boost the culture of innovation and creation of opportunities that support the prosperity of stakeholders and the environment.

#### 3.2.1 Environment

Rumo seeks to minimize the impacts of its activities and to help preserve natural resources in accordance with the laws, thus becoming a benchmark in environmental management.

- Act responsibly and consciously in the sustainable use of ecosystem services and resources to reduce consumption;
- Protect biodiversity, ecosystems and natural resources, especially those related to vulnerable areas and endangered species;
- Ensure legal compliance in operations, especially the environmental laws in effect;

Circulation or disclosure of this document is restricted to Group companies and employees.  
External disclosure is prohibited, unless expressly authorized by Internal Audit.

## STANDARDS AND PROCEDURES

### Sustainability Policy

- Promote energy efficiency in processes by deploying innovative initiatives and technologies;
- Prioritize the use of clean energy in the company's operations, in replacement of energy from conventional sources;
- Manage the contracting of energy in the national energy matrix and define the trading strategies;
- Prioritize sustainable practices and methods for allocation of waste;
- Encourage environmental awareness among stakeholders through disclosures and campaigns that stimulate the sustainable and austere use of energy and natural resources;
- Act in a preventive manner to avoid negative impacts or significant changes in the environment;
- Promote the life cycle of products acquired in order to encourage the reuse of materials.

#### 3.2.2 Climate Change

To reduce its greenhouse gas emissions and thus contribute to a low carbon economy, Rumo monitors the emissions from its operations in order to mitigate them and adapt to climate change.

- Keep the Greenhouse Gas (GHG) Inventory updated and audited annually, besides disclosing the results internally and externally;
- Expand the monitoring of the Company's emissions to plan and launch actions to reduce and / or offset emissions;
- Promote energy efficiency actions to encourage the reduction in the consumption of inputs and reduce the carbon intensity of its operations;
- Encourage technological initiatives to reduce GHG emissions from activities and develop solutions to mitigate the impacts of climate change;
- Evaluate the ways of offsetting GHG emissions;
- Set public targets to reduce GHG emissions in accordance with operational characteristics;
- Actively participate in discussion forums and formulation of public policies related to climate change and adaptations, keeping the team updated on the subject;

## STANDARDS AND PROCEDURES

### Sustainability Policy

- Encourage in its strategy, the evaluation of risks and opportunities with regard to climate change;
- Assign responsibilities for the management of GHG emissions and disseminate themes related to climate change to everyone at Rumo;
- Promote an open channel for benchmarking with other railway companies in indicators and practices to reduce emissions.

#### 3.2.3 Community Relations

Rumo's operations are aimed at promoting harmonious coexistence by creating a positive impact on communities around the railroad through an ethical and accessible relationship.

- Promoting the social and environmental responsibility practices of the company through environmental awareness and education actions;
- Considering the interests and expectations of communities through participative construction in order to stimulate grassroots development;
- Maintaining open and transparent dialogue with people in the surrounding cities;
- Providing and disclosing the communication channel existing with the communities, ensuring that reports are duly forwarded for investigation and for minimizing impacts;
- Identifying and evaluating the social impacts of Rumo's activities to take preventive action, thereby avoiding or minimizing the existing risks;
- Establishing monitoring indicators for social programs, as well as monitor, evaluate and disclose the findings.

#### 3.2.4 Relations with Stakeholders

Rumo's relations with its stakeholders are based on actions aimed at a transparent and ethical connection, involving positive and long-term exchanges. Bringing all stakeholders closer to the sustainability strategy, as well as other positions, processes and content on the subject leads Rumo to an environmentally harmonious and socially responsible future.

- Identifying positive and negative aspects for stakeholders in order to meet the expectations of each stakeholder group;
- Promoting stakeholder management by engaging them in activities and decision-making;

Circulation or disclosure of this document is restricted to Group companies and employees.  
External disclosure is prohibited, unless expressly authorized by Internal Audit.

## STANDARDS AND PROCEDURES

### Sustainability Policy

- Consulting stakeholders while revising Rumo's materiality studies to obtain their opinion, considering the unique characteristics of each stakeholder. Consultations will not be binding on the studies;
- Maintaining an active communication channel for topics related to health, occupational safety, environment and society, generating value for sustainable management;
- Conducting periodic disclosures about the Company's sustainable development initiatives to meet the specific interests of each stakeholder;
- Promoting stakeholder development through awareness and education on sustainability.

#### 3.2.5 Diversity

At Rumo, diversity and inclusion are important topics on the company's agenda, and hence we have a strategic plan sustained by the following pillars:

- Affinity groups for each D&I axis: race, LGBTQIAP+, gender and PwD;
- Inclusion processes from the social base to the physical structuring;
- Inclusive communication in key organization channels;
- Gender equality in its broadest sense;
- Encouraging spaces for dialogue through specific forums on socially sensitive topics;
- Combating discrimination through campaigns and strengthening of the Ethics Channel.

#### 3.2.6 Human Rights

- Promoting a work environment based on respect for Universal Human Rights and the ethical values and principles established in the Code of Conduct of Rumo, with the commitment to stimulating the inclusion and diversity across all levels of the Company, without discrimination based on race, color, gender, language, nationality or any other reason such as religion, age, sexual orientation, political opinion or social condition.
- Curbing, repudiating and devoting the best efforts to combat any practices of forced, child, compulsory or slave labor, as well as activities related to the sexual exploitation of children and youth across its Value Chain.

## STANDARDS AND PROCEDURES

### Sustainability Policy

- Promoting an environment of continuous development of people in order to create mechanisms for strengthening the skills and valuing achievements, ensuring succession at all levels of the organization and stimulating satisfaction, motivation, development, as well as professional and personal commitment of our Employees.
- The health and safety of people and operations are non-negotiable values. Hence, promoting the culture of safety, investing in training, monitoring and disclosing indicators related to the topic are an integral part of our commitments.

#### 3.2.7 Governance

Rumo conducts its operations according to the best corporate governance practices and in compliance with the laws, policies and procedures established by regulatory bodies and stakeholders, guided by moral and ethical values. Considering the transparency across its operations, the values are disseminated to both internal and external public through the Code of Conduct, policies and procedures, with the focus on creating value for business and society.

Conducting its business in line with the best practices of corporate governance and compliance is essential for Rumo, which, through its ethical culture, seeks to:

- Disseminate ethical values across all hierarchical levels and positions of the Company;
- Comply with legal standards, implementing measures to combat illegal practices and conduct;
- Regulate the use of stakeholder information and their privacy based on ethical and social principles, respecting the environment;
- Provide an Ethics Channel for internal and external public to receive queries and reports of illegal or unethical conduct;

#### 3.2.8 Supplier Management

For an efficient Value Chain that is focused on sustainability management, it is essential to work closely with suppliers, prioritizing services that are critical to the operations of an organization. After a strategic analysis of all interactions with the providers of goods and services, it is necessary to establish the evaluation criteria and seek companies with the

## STANDARDS AND PROCEDURES

### Sustainability Policy

technical and financial capacity.

- Evaluate and monitor the chain of strategic suppliers on sustainability aspects and legal requirements;
- Give priority to engaging local suppliers, provided they meet the criteria and premises established in Rumo's policies, thereby contributing to the development of the regions where the Company operates;
- Discuss with suppliers and its Value Chain topics associated with human rights, discrimination practices and working conditions;
- Encourage suppliers to promote sustainability through open innovation practices and continuous improvement of processes;
- Conduct campaigns and disclosures for raising awareness among suppliers to mitigate significant social and environmental risks.

#### 4. PENALTIES

Noncompliance by stakeholders, as applicable, with the procedures set forth in this Policy will be analyzed by the Company, considering the situation in question, and the consequent submission of a report with recommendations, as applicable, to the Strategic and Sustainability Committee, the Ethics Committee or the Audit Committee, and subsequent reporting to the Board of Directors, which may subject the person in breach to appropriate disciplinary sanctions in accordance with the internal rules of Rumo established in the Policy on Disciplinary Measures and in the Code of Conduct, without prejudice to administrative, civil and legal proceedings, as applicable, by Rumo.

Regarding Third Parties, noncompliance with this Policy or applicable laws may result in immediate contractual termination and the application of penalties resulting from the termination, without prejudice to action for damages and other applicable legal measures.

0	03	70	013
---	----	----	-----



**STANDARDS AND PROCEDURES**  
**Sustainability Policy**  
**5. REVISION AND APPROVAL**

Board of Directors	Board of Directors
Fernanda Verzenhassi Sacchi	Executive Officer - People, ESG and Communication
Renata Twardowsky Ramalho	Executive Manager - Environment and Sustainability