



POLICIES:	NO.: 03
Sustainability Policy	Document Drafted on: 22/03/2018
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Area: Sustainability Management	Date of last alteration: 28/04/2025

1. OBJECTIVES AND SCOPE

This Sustainability Policy (“Policy”) aims to provide guidance for addressing sustainability issues relating to Localiza Rent A Car S.A., its subsidiaries and controlled companies (“L&CO”, “Localiza” or “Companhia”), in order to disseminate the ESG principles throughout the entire value chain of the Localiza Group, and seeks alternative and innovative solutions that will generate a positive impact for the people, the business and the planet.

Localiza’s Sustainability Policy applies to the entire business platform of Localiza and its subsidiaries. The guidelines that we present here are to be fully complied with by all employees at all hierarchical levels, in our headquarters and in all of our offices, either our own or those of franchisees, located in the countries where we operate, in addition to applying to our suppliers and all business partners. The guidelines must always be taken into consideration when taking decisions, defining and implementing new strategies.

This Policy stresses our commitment to a sustainability strategy that is in line with the business, inspiring the leadership and employees of Localiza when making decisions that take into consideration the equilibrium of environmental, social, governance and financial matters.

2. CONCEPTS AND DEFINITIONS

For Localiza, being sustainable means to being **ethical** and **respected** company that acts innovatively in order to generate a **positive impact** for the business, the people and the planet.

We believe that sustainable development occurs when the economic, social and environmental dimensions are integrated with the company’s strategy in a systemic and genuine manner. That is the only way to disseminate and practice sustainable development throughout the value chain in which we are inserted, sharing value with our stakeholders and contributing to a more balanced, aware, fair and inclusive economy. The future of mobility in which we believe takes into account the continuity of business and the optimization of the use of natural resources.

Term	Definition
D&I	Diversity and Inclusion
ESG	Environmental, Social, and Governance
GHG	Greenhouse gases
PSI	Private social investment
KPI	Key Performance Indicator



Term	Definition
L&CO	Localiza and company
SDG	Sustainable Development Goals
UN	United Nations Organization
PMO	Project Management Office
HR	Human Resources
<i>Stakeholders</i>	Stakeholders

3. SUSTAINABILITY GUIDELINES

At Localiza we believe that business strategy based on ethical and sustainable principles, and which promotes a transparent dialogue with our stakeholders, contributes to the generation of shared value.

Our sustainability guidelines are dynamic, and are defined according to our material subjects (**APPENDIX I**) and present the priority approaches that are defined for the current cycle.

In order to build the future of sustainable mobility, all Localiza's employees, suppliers and business partners must make the effort to comply with the following sustainability guidelines:

- ❖ To engage, raise awareness and promote the participation of our clients in sustainable development;
- ❖ To encourage and prioritize our employees and contractors in line with Localiza's sustainability guidelines and provide support so that they can be complied with and implemented;
- ❖ To implement the culture of sustainability in daily life and in the business operations;
- ❖ To comply with any and all environmental, labor, safety and anti-bribery legislation and regulations;
- ❖ To engage in national and international voluntary commitments to Sustainable Development Goals (SDGs);
- ❖ To inform stakeholders about the sustainability performance in a transparent, clear and frequent manner;
- ❖ Engage in a dialogue and share the positive experience and acquired knowledge with society, contributing to awareness-raising and engagement in sustainable development;
- ❖ Promote well-being and job satisfaction at the workplace;
- ❖ Train and develop employees;
- ❖ To encourage and prioritize the use of technologies and fuels that generate fewer pollutants/greenhouse gases (GHG) in the fleet;
- ❖ Promote and invest in low carbon innovation and technological development, offering a qualified and innovative service;
- ❖ To manage waste appropriately, promoting circularity, focusing on the disposal of waste from fleet maintenance;



- ❖ To promote and encourage energy efficiency and the use of alternative renewable energy sources;
- ❖ Encourage and promote the efficient and rational use of water;
- ❖ To manage the sustainability indicators and set up targets in order to continuously improve our performance;
- ❖ To manage greenhouse gas emissions in order to mitigate climate change;
- ❖ To combat all forms of corruption and bribery;
- ❖ To foster respect for, and the implementation of, human, social, economic and cultural rights that are internationally recognized;
- ❖ To promote engagement and development actions for all audiences, creating safe and collaborative environments, fostering teams that possess complementary characteristics;
- ❖ To apply the best practices in occupational health and safety for our own employees, contractors and communities that are affected by the Company's activities;
- ❖ To forbid and repudiate any form of forced labor, including labor analogous to slavery or human trafficking within our operations, and conduct regular monitoring to minimize any potential risks in the supply chain;
- ❖ To respect the rights of children and adolescents by prohibiting and rejecting child labor within our operations, making sure that all hiring processes comply with the legal minimum working age, pursuant to all applicable legislation;
- ❖ To promote equal opportunities and prevent discriminatory treatment across all areas of the organization, without any prejudice related to race, nationality, ethnic origin, religion, gender, sexual orientation and identity, marital status, age, or disability;
- ❖ To promote pay equity for similar positions in comparable contexts;
- ❖ To repudiate all forms of harassment, threats, or intimidation—whether verbal, physical, sexual, or psychological—in the workplace;
- ❖ To respect the economic, social and cultural rights of the communities where the Company is located or in which it performs its activities, in order always to maintain collaborative relationships;
- ❖ To maintain an active confidential whistle-blowing channel to allow for the secure—and, if desired, anonymous—reporting of violations of Localiza's Code of Conduct and Integrity Program Policies and Procedures, and also the applicable laws, providing whistle blowers with protection against retaliation;
- ❖ To promote and provide appropriate means of engagement with Affected Communities throughout the entire project life cycle for issues that may potentially impact them, and make sure that relevant social and environmental information is effectively disclosed and communicated;
- ❖ To contribute to safer traffic in order to save lives; and
- ❖ To promote urban mobility and the intelligent use of vehicles.

4. OCCUPATIONAL SAFETY GUIDELINES

Just as we will work to ensure compliance with the highest levels of governance in our activities, we will also act for the occupational safety guidelines to be followed in order to protect the working environment as a whole. Thus, in addition to the provisions set out in the Code of Conduct and other policies and procedures of the Company, the following guidelines are to be followed:



- ❖ Those individuals and/or teams in charge designated for security and asset surveillance will receive periodic training to ensure proper conduct towards Localiza's employees, customers, and other stakeholders;
- ❖ Suppliers engaged for these security activities will undergo due diligence checks on their integrity to make sure that they are qualified to provide the services, including any necessary certifications, in accordance with applicable legislation;
- ❖ At all levels and hierarchies, there will be an emphasis on encouraging the peaceful resolution of disputes and prevention of harm;
- ❖ The use of force will not be allowed, except for preventive and defensive purposes, in proportion to the nature and extent of the threat;
- ❖ Carrying firearms is prohibited within the company premises, except by law enforcement officers or representatives of competent authorities; these individuals are to be duly identified and must be exercising their official duties;
- ❖ The regulations related to the equipment and facilities necessary for occupational health and safety will be complied with, including but not limited to the use of personal protective equipment, work safety equipment, structural and infrastructure installations designed to protect workers, and applicable permits and authorizations, as those may be suitable for the roles, activities, and environments involved; and
- ❖ The company shall report to the competent authorities any events that violate applicable legislation or that may require appropriate measures by these authorities.

5. GOVERNANCE

5.1. ROLES AND RESPONSIBILITIES

5.1.1. BOARD OF DIRECTORS:

In addition to the other duties laid down in Localiza's Internal Regulations and Bylaws, the Board of Directors shall:

- ❖ Approve the Policy and its revisions according to the recommendations by the Governance, Indication and Sustainability Committee;
- ❖ Observe the factors associated with environmental, social, health and safety and governance matters, guiding the company in the incorporation and continuous improvement of its corporate operations; and
- ❖ Follow up and oversee the sustainability indicators through the Governance, Nomination and Sustainability Committee, using those indicators as parameters for managing the Company.

5.1.2. GOVERNANCE, NOMINATION AND SUSTAINABILITY COMMITTEE:

In addition to the other duties laid down in its by-laws, the Governance, Nomination and Sustainability Committee shall:

- ❖ Analyze and discuss opportunities, initiatives and strategies regarding environmental, social and governance subjects in all aspects in the Company; and
- ❖ Make recommendations/proposals on ESG issues to the Board of Directors and the Board of Executive Officers.

5.1.3. SUSTAINABILITY EXECUTIVE COMMITTEE



In its last update on April 28, 2021, by the Company's Board of Directors, the Internal Regulations for the Sustainability Committee of Localiza Rent a Car S.A. made official the creation and the scope for operation for the Sustainability Committee, given the provisions in the Corporate Bylaws, in the Board of Directors' Internal Regulations and in the regulations in force.

The Committee's operations shall follow a calendar and annual meeting schedule, according to which regularly scheduled topics will be established in advance. Meetings will be held quarterly as a regular practice and, on an exceptional basis, whenever necessary, upon a substantiated request from any members.

The Executive Sustainability Committee will have the following duties and responsibilities, in addition to any other tasks assigned by the Board of Directors:

- ❖ To assist the Company's Board of Directors, its Governance, Nomination and Sustainability Committee, and the Executive Directors in all aspects regarding sustainability;
- ❖ To identify, address, monitor, and manage sustainability-related issues that may pose risks or have a significant impact on the business, long-term results, or relationships with customers and employees, as well as the Company's reputation;
- ❖ To approve corporate policies and procedures related to social and environmental responsibility issues, determining and implementing actions for their communication and dissemination;
- ❖ To assess and propose institutional campaigns aimed at engaging the Company in social and environmental issues, including the allocation of necessary resources;
- ❖ To draft a consistent Corporate Sustainability Policy, keep it up to date and propose changes whenever necessary;
- ❖ To ensure the inclusion of social and environmental responsibility practices in the Company's strategic planning, as well as in the organization's management practices and operations.
- ❖ To encourage innovative practices in business and operations, always with a focus on sustainability;
- ❖ To propose or recommend the engagement of professionals specializing in the subject when deemed necessary;
- ❖ To evaluate and propose adherence to, continuation of, or potential disengagement from national or international 'Principles, Protocols, Agreements, and Treaties' related to social and environmental responsibility issues;
- ❖ To seek and implement the best practices, policies, procedures, standards, and applicable legislation on the matter;
- ❖ To map and establish skills for taking necessary actions and eliminate or mitigate social, environmental, and climate risks and/or misconduct that constitute violations of human rights and harm to the environment;
- ❖ To propose programs and tools for in-house training aimed at spreading knowledge and raising awareness of subjects and practices regarding social and environmental responsibility;
- ❖ To keep an up-to-date report of active and ongoing sustainability practices and actions;
- ❖ To refer to the respective officers in charge or the Ethics Committee for resolution any situations involving non-compliance with the Corporate Sustainability Policy;
- ❖ To record the minutes of meetings and decisions made during the meetings in a specific, dedicated book, as well as other documents related to the Committee's activities, such as



statements of appointment for members, contracts with suppliers or service providers, evidence of compliance with legislation and regulations, among others, all in accordance with the Committee's decisions; and

- ❖ To report to the members of the Board of Directors and Board of Executive Officers any matters that may significantly impact the Company's reputation.

5.1.4. DIVERSITY AND INCLUSION COMMITTEE

A key, strategic component of our ESG progress—especially within the pillar of Social Transformation—Localiza's Diversity and Inclusion Program addresses the full spectrum of topics on diversity, including gender, age, disability, race/ethnicity, sexual orientation, gender identity, culture, nationality, place of origin, social class, educational background, physical condition, intellectual development, religion, lifestyle, experience, individual background, perspectives, knowledge, attitudes, and skills, among many other traits that make each person unique.

The Committee's operations shall follow a calendar and annual meeting schedule, according to which regularly scheduled topics will be established in advance. Meetings will be held every two months as a regular practice and, on an exceptional basis, whenever necessary, upon a substantiated request from any members.

For strategic purposes, the program operates through six (6) Affinity Groups focusing on the following themes: gender equity, race, LGBTI+, people with disability, generational matters, and, finally, migrants and individuals in refugee situations. Topics related to diversity and inclusion that fall outside the scope of Localiza's Affinity Groups are the residual responsibility of its Diversity and Inclusion Committee.

The governance system of Localiza's Diversity and Inclusion ("D&I") is formed of seven (7) roles:

1. Executive Sponsor: He or she represents the Affinity Group on the Executive Committee;
2. Members of the Committee's core: They represent HR, Communication and the area in charge of the Company's Diversity Program;
3. PMO: he or she will be responsible for defining reporting standards for project monitoring and control, standardizing KPIs and structuring RIGs, defining a monthly update routine with integration of those in charge of the groups, and monitoring the status of actions, reporting to the Committee;
4. Representatives: They represent the Affinity Group and the Diversity Committee;
5. Core Group: each affinity group has a core group or management group, which is responsible for developing the action plan, as well as managing volunteers and allies. This core is formed by: (a) Leader; (b) Co-leader; (c) Representative of the corporate communication department; (d) Representative for personnel and human resources; and (e) Manager of allies.
6. Volunteers: each affinity group is supported by volunteers who are responsible for implementing and executing the actions planned and approved by the Diversity and Inclusion Committee.
7. Allies: individuals who believe in the causes represented by each of the pillars and who engage in specific actions without the ongoing commitment required of volunteers.

5.1.5. LOCALIZA INSTITUTE



Social investment through the Localiza Institute is closely aligned with the values of its parent company, its commitment to being a Citizen Company, its sustainability principles, and the concept of private social investment (PSI). The Institute's actions are guided by best practices in Third Sector management and by the Sustainable Development agenda, as reflected in the United Nations Sustainable Development Goals (SDGs).

Established for the purpose of contributing to social transformation processes, the Localiza Institute will streamline its investments in accordance with its social mission, as set forth in its bylaws. As a priority, it will seek to support programs that provide technical training and foster entrepreneurship among young people in situations of socioeconomic vulnerability, aiming for synergy with economic activities and geographic areas related to the Localiza ecosystem.

To achieve its purpose, the Institute may develop its own social projects or support third-party initiatives. In the latter case, it may establish partnerships and provide voluntary funding to implementing organizations—either as investments or donations—in accordance with its Social Investment and Donations Procedure.

The Institute's activity planning will take into account its primary areas of focus, as well as the process of dialogue with society and the promotion of leadership and engagement of social players. The Institute will set annual goals and monitor the indicators and outcomes of the projects included in its social investment portfolio. Additionally, for the purpose of transparency, it will disclose information regarding financial resources and investments made.

The Institute will present its activity plan and financial reports to its Board of Directors on a semiannual basis, and submit an annual activity report to Localiza's Board of Directors.

In addition to that, the Institute may contribute to the review and monitoring of projects related to Localiza's social responsibility initiatives.

5.1.6. SUSTAINABILITY MANAGEMENT

It will be the responsibility of the Sustainability Management and appointed representative to:

- ❖ Review Localiza's Materiality Matrix and support the definition of projects, KPIs, goal management mechanisms, metrics, and governance of initiatives.
- ❖ Manage the Diversity and Inclusion program, ensuring the alignment of initiatives across the platform and proper perception of the program by both internal and external audiences.
- ❖ Make sure that proposed initiatives have scale, agility, simplicity, austerity, and alignment with Sustainability guidelines and policies, seeking technological and process innovations, benchmarks, and industry studies.
- ❖ Set up and implement improvements in communication and engagement for sustainability with leadership, employees, and stakeholders (such as the financial market, industry associations, and relevant organizations), using communication and institutional relationship strategies to make sure that the company's efforts are positively perceived by stakeholders.
- ❖ Ensure the consistency of internal activities and compliance with defined parameters through the development, availability, and redesign of area procedures and processes, and further monitoring their execution.



- ❖ Identify and provide opportunities to strengthen corporate reputation through the management of special ESG (Environmental, Social, and Governance) projects, cause the company to participate in related rankings and events, and provide guidance to leadership in business and corporate areas.
- ❖ Help the company enhance its reputation and mitigate risks by helping leadership to identify opportunities for process improvements and corporate relationships related to ESG.
- ❖ Help area leadership manage the ESG process through actions that ensure uniformity and agility in addressing strategic topics;
- ❖ Foster a sustainable, high-performance culture within a healthy organizational climate; and
- ❖ Engage all employees and business partners in a vibrant and passionate vision of serving customers.

6. EXTERNAL COMMITMENTS

The Company's external efforts in promoting sustainable development are also carried out through external commitments established to reinforce Localiza's interest in achieving sustainable development in its three dimensions—economic, social, and environmental—in a balanced and integrated manner. The Company is also a signatory of the initiatives below.

6.1. SUSTAINABLE DEVELOPMENT GOALS – SDG

The Sustainable Development Goals are a collection of 17 global goals established by the United Nations (UN) in 2015. They aim to address the world's greatest challenges, including poverty, inequality, climate change, environmental degradation, peace, and justice. The SDGs are part of the 2030 Agenda for Sustainable Development, a global action plan to promote prosperity and protect the planet.

Localiza focuses its efforts and resources on initiatives that promote 13 SDGs related to its operations, as detailed in APPENDIX I.

6.2. COMMITMENT TO THE CLIMATE

This is a movement aimed at engaging and inspiring the private sector in climate responsibility actions. It plays a key role in selecting carbon credit-generating projects through calls for proposals, with a strong reputation and governance for emission offsetting.

6.3. CITIZEN COMPANY

Localiza is a Citizen Company and, therefore, has extended maternity leave to sixty days, and paternity leave to fifteen days, in addition to the five days already provided for by law. Furthermore it has extended the full work-from-home facility after this period for another six months for fathers and mothers.



7. EXPIRY DATE

This Sustainability Policy is valid for three (3) years from the date of publication. The sustainability guidelines, which complement the policy, are updated whenever a new review of the materiality matrix is conducted and are submitted for approval by the Board of Directors.

All levels of the organization are to be notified whenever this policy is updated.

8. THE CORRUPTION REPORTING CHANNEL

In line with best corporate governance and risk management practices, Localiza provides a whistleblowing (confidential) channel for reporting unethical or illegal situations that may occur within the company. Localiza's Confidential Channel is operated by an independent company and is available 24/7. The channel is accessible through any of the following methods:

- ❖ Telephone:
 - 0800 979 2055 (for calls originating from Brazil – toll free)
 - 55 11 3232-0786 (for calls originating from overseas – collect call)
 - 24-hour electronic service (voicemail), or from Monday to Saturday, from 8am to 8pm (Brasília time), with the option of assistance from an analyst.
- ❖ Website: www.canalconfidencial.com.br/localiza
- ❖ E-mail: localiza@canalconfidencial.com.br

9. REFERENCES

- ❖ Materiality Matrix (Appendix I)
- ❖ Sustainability Guidelines (Appendix II)
- ❖ Localiza Sustainability Committee's Internal Regulations
- ❖ Diversity and Inclusion (D&I) Committee's Bylaws
- ❖ Code of Conduct of Localiza
- ❖ Anti-corruption Policy
- ❖ Reporting Procedure and Non-Retaliation to Whistle Blowers
- ❖ Supplier Relationship Policy
- ❖ Health Procedure - Always Well
- ❖ Social Investment Policy
- ❖ Volunteering Policy
- ❖ Emergency Support Procedure
- ❖ Engagement Plan for stakeholders
- ❖ ESG Management procedure for contractors

10. ACCEPTANCE

The information contained in this document will be approved by the areas involved in the drafting hereof and will be disclosed within the Company once approved by the Governance, Nomination and Sustainability Committee and the Board of Directors.



Políticas & Procedimientos **INTERNOS**



Chief People Officer / Sustainability Manager

Legal Director

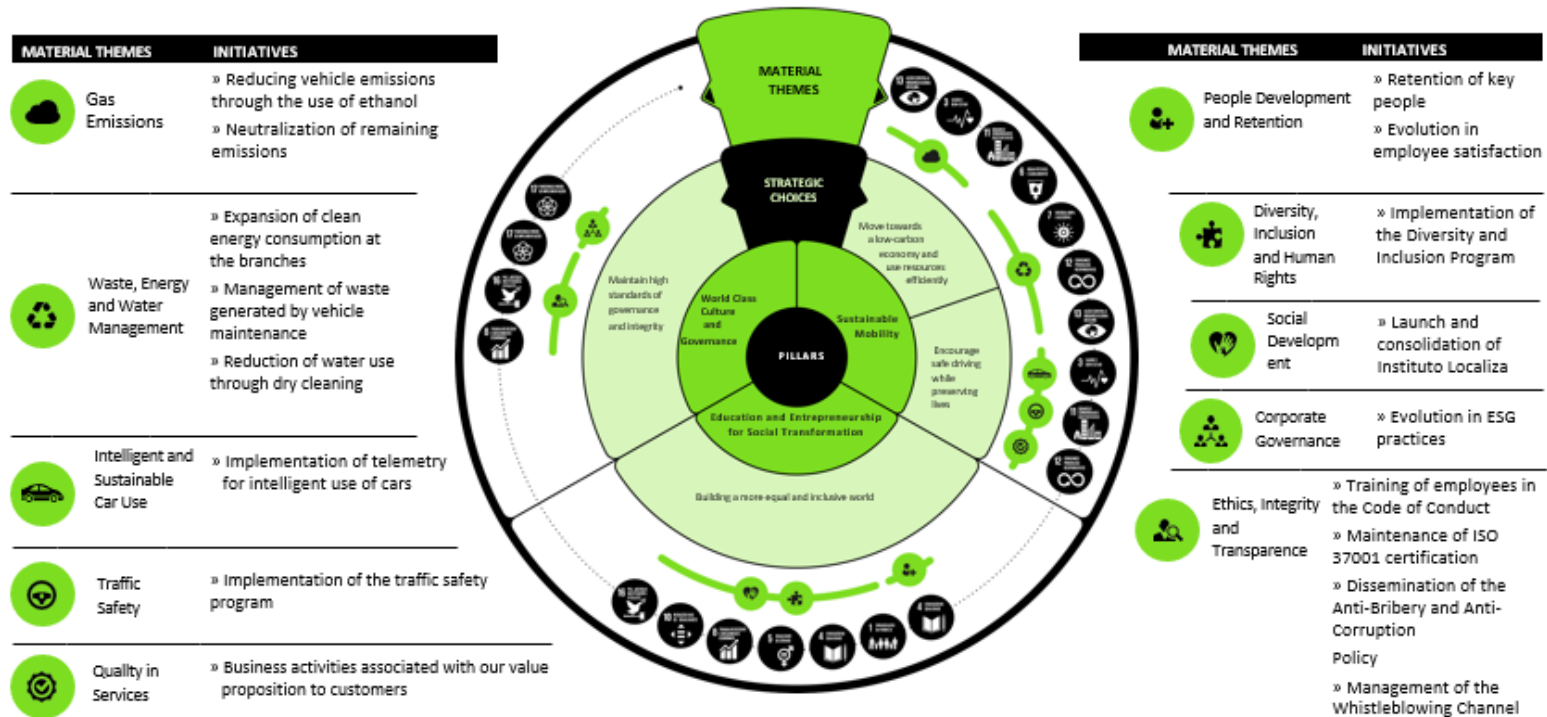
Board of Directors / Governance, Nomination and Sustainability Committee

APPENDIX I

MATERIALITY MATRIX

Localiza's materiality matrix is reviewed every three years, or as needed, and each update serves to refine our commitments and guide our strategic direction.

Materiality was defined based on three pillars and ten key topics, which unfold into seventeen initiatives.





APPENDIX II

SUSTAINABILITY GUIDELINES OF LOCALIZA

The ten topics identified as material in the current cycle are provided below. They are grouped according to the environmental, social, and governance (ESG) dimensions.

Sustainable Mobility

- ❖ Use biofuels;
- ❖ Electrify our fleet;
- ❖ Conduct preventive maintenance and achieve an efficient fleet mix;
- ❖ Manage waste resulting from fleet and office maintenance;
- ❖ Manage consumption giving priority to renewable energy sources;
- ❖ Promote efficient, rational use of water;

Social Transformation

- ❖ Promote a culture of sustainability throughout the value chain;
- ❖ Combat discrimination and promote diversity;
- ❖ Foster a sense of purpose at work and support professional growth;
- ❖ Drive social investment through education, entrepreneurship, and productive inclusion;
- ❖ Prevent accidents and occupational diseases through early identification, and the elimination or minimization of risks;
- ❖ Raise awareness and continuous training of employees on safe practices;
- ❖ Ensure compliance with occupational health and safety standards and regulations;
- ❖ Foster a safety culture where all employees feel responsible for collective safety.

World-Class Governance

- ❖ Establish a socio-environmental management structure;
- ❖ Promote transparency and ethics in business;
- ❖ Combat bribery and corruption;
- ❖ Implement mechanisms for receiving complaints and managing consequences;
- ❖ Sustainable business growth;

All employees, suppliers, and business partners of Localiza, in pursuit of the purpose of building the future of mobility in a sustainable way, must adhere to the following sustainability guidelines:

- ❖ To engage, raise awareness and promote the participation of our clients in sustainable development;
- ❖ Encourage and prioritize suppliers and contractors aligned with Localiza's sustainability guidelines, and help them implement these practices;
- ❖ To implement the culture of sustainability in daily life and in the business operations;
- ❖ Engage in voluntary national and international commitments for sustainable development;
- ❖ To inform stakeholders about the sustainability performance in a transparent, clear and frequent manner;
- ❖ Engage in a dialogue and share the positive experience and acquired knowledge with society, contributing to awareness-raising and engagement in sustainable development;
- ❖ Combat all forms of discrimination, moral harassment, and sexual harassment in the workplace;



- ❖ Promote social inclusion and diversity in the workforce by forming complementary teams;
- ❖ Promote well-being and job satisfaction at the workplace;
- ❖ Train and develop employees;
- ❖ Encourage and prioritize the use of biofuels in the fleet;
- ❖ Promote and invest in low carbon innovation and technological development, offering a qualified and innovative service;
- ❖ Manage waste appropriately, focusing on the disposal of waste resulting from fleet and office maintenance;
- ❖ Promote and encourage energy efficiency and the use of renewable energy;
- ❖ Encourage and promote the efficient and rational use of water;
- ❖ Manage sustainability indicators and set goals to continuously improve performance in this area;
- ❖ Manage greenhouse gas emissions, aiming to contribute to climate change mitigation;
- ❖ Combat all forms of corruption;
- ❖ Promote urban mobility and the intelligent use of vehicles.