Corporate Policy

TITLE: **PERSONAL DATA PROTECTION POLICY**

1. Definitions

"Data Protection Authority": an independent public body or entity responsible for ensuring compliance with personal data protection regulations, supervising data processing, and applying sanctions in cases of non-compliance. In Brazil, this function is performed by the National Data Protection Agency (ANPD).

"Legal Bases": the lawful grounds that authorize the Processing of Personal Data. Examples include the Data Subject's consent, the performance of a contract, the fulfillment of a legal or regulatory obligation, or legitimate interest.

"Subsidiaries": means all entities, in Brazil or abroad, in which Embraer, directly or indirectly, holds equity or shareholder rights that grant it predominance in corporate decisions and the power to appoint the majority of the management members.

"Legal Department": the Legal Directorate (DJU), through the Legal Innovation and Technology Department (JIT).

"Privacy and Data Protection Committee": a collegiate and cross-functional group formally established by Embraer to make strategic decisions related to the privacy and data protection governance program. The Committee is responsible for providing guidance and oversight regarding the implementation of this Policy.

"Personal Data": any type of data or information that can directly or indirectly identify an individual, even if such identification requires association with other elements.

"Sensitive Personal Data" or "Sensitive Data": personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as data concerning genetics, biometrics (for unique identification purposes), health, or a person's sex life or sexual orientation.

"Embraer" or "Company": refers to Embraer S.A., its Representative Offices, and Branches.

"Employee": any individual working for Embraer, its Subsidiaries, or Joint Ventures, including directors, officers, managers, and employees, regardless of their employment arrangement.

"Data Protection Officer (DPO)": the formally appointed professional responsible for advising Embraer on the compliance of its governance program with Brazilian legislation and best market practices, with institutional support and oversight from the Privacy and Data Protection Committee to perform their duties with autonomy and independence.

"Branch": an establishment, in Brazil or abroad, without its own legal personality and sharing the same root CNPJ number as Embraer.

"Embraer Group": collectively refers to Embraer and its Subsidiaries and Joint Ventures.

"Incident": any actual or potential security breach that results, accidentally or intentionally, in the unauthorized destruction, loss, blocking, alteration, disclosure of, or access to Personal Data.

"Joint Venture": any company, in Brazil or abroad, in which corporate resolutions and the appointment of management are exercised jointly by Embraer (directly or indirectly) and one or more partners with a significant interest.

"Applicable Legislation": the set of legal rules governing the processing of personal data, establishing principles, data subject rights, obligations of data controllers and processors, and sanctions in case of non-compliance. In Brazil, this role is fulfilled by the General Data Protection Law (Law No. 13,709/2018 – LGPD). In addition, considering Embraer's global operations, special attention should be given to the European Union's General Data Protection Regulation (GDPR), U.S. state privacy laws, the United Kingdom GDPR (UK GDPR), China's privacy regulations, and Singapore's Personal Data Protection Act (PDPA).

"Embraer Cybersecurity Incident Response Procedure": Docemb 7531.

"Policy": this Personal Data Protection Policy of the Embraer Group.

"Procedure": the Governance Procedure for Personal Data Protection – Docemb 15096.

"Third Party" or "Processor": any natural person (who is not an Employee of the Embraer Group) or legal entity, including contracted parties and business partners (formally or informally), that may carry out any type of Personal Data Processing on behalf of the Embraer Group.

"Data Subject": the natural person to whom the Personal Data refers, which may include, but is not limited to, an Employee of the Embraer Group, a customer, a representative of a supplier, a student at Colégio Embraer, or a candidate applying for a position within the Embraer Group.

"Processing": any operation or set of operations performed on Personal Data, including, but not limited to, access, storage, cleansing, viewing, collection, deletion, sharing, and other related activities.

2. The Policy

This Policy must be observed by the entire Embraer Group in all operations involving the Processing of Personal Data. Its purpose is to guide business conduct in an ethical manner, ensuring the right to the protection of Personal Data. The provisions of this Policy also apply to Third Parties.

This Policy and the examples provided are not intended to address every possible question or situation related to Personal Data protection but rather to help the reader understand the purpose and importance of data protection.

Whenever there are doubts regarding the application of this Policy or the appropriateness of a particular conduct, the Legal Department — through the Legal Innovation and Technology Division — together with the Data Protection Officer, must be contacted immediately via the email address indicated at the end of this Policy.

All Employees and Third Parties are expected to be familiar with this Policy, to comply with it, and to identify and report any potential issues related to Personal Data protection in a timely manner so that they can be properly handled by the Legal Innovation and Technology Division in coordination with the Data Protection Officer.
This Policy must be read in conjunction with the Code of Ethics and related policies and procedures, particularly those governing information security rules. In the event of a conflict between this Policy and other Embraer Group policies, the most stringent and specific policy or procedure concerning Personal Data protection shall prevail. In such cases, the Employee or Third Party must notify the Data Protection Officer, who shall promptly address the conflict, provide guidance on the appropriate actions to be taken, and, if necessary, update the relevant policy or procedure.

3. Objective

The purpose of this Policy is to describe and explain the general principles and rules governing the

Processing of Personal Data that must guide the Company's operations. Given its global nature, the Embraer Group is subject not only to the Brazilian General Data Protection Law, but also to other foreign privacy and personal data protection laws, such as the General Data Protection Regulation (GDPR), the privacy laws of the United States, the United Kingdom General Data Protection Regulation (UK GDPR), the data protection laws of China and Singapore, among others applicable in the jurisdictions where Embraer maintains significant operations.

For the purposes of this Policy, all such laws and regulations shall be collectively referred to as Applicable Legislation, and the Embraer Group shall ensure compliance with their principles and requirements in all its Personal Data Processing activities.

4. Scope of Application

This Policy applies to the entire Embraer Group, including the Company's international operations and any business activities managed or conducted on behalf of the Embraer Group by Third Parties.

5. Principles and Guideline

The Processing of Personal Data within the Embraer Group must be carried out in strict compliance with the principles established by the Applicable Legislation.

These principles represent fundamental guidelines that govern the collection, use, storage, sharing, and any other Processing activities involving Personal Data, ensuring that such activities are performed ethically, lawfully, and transparently.

All recipients of this Policy must collectively observe the following principles:

5.1. [LAWFULNESS, FAIRNESS AND TRANSPARENCY] Carry out the Processing of Personal Data in a lawful, fair, and transparent manner, ensuring that it occurs only when supported by an applicable Legal Basis, always providing clarity and transparency to the Data Subject, and in accordance with the ethical principles that guide the Embraer Group's activities.

5.2. [PURPOSE LIMITATION] Process Personal Data only for legitimate, specific, explicit, and previously informed purposes, observing the purpose that justified its collection and prohibiting its use for any objective different from that originally communicated.

5.3. [DATA MINIMIZATION AND NECESSITY] Limit the Processing of Personal Data to the minimum necessary to achieve the legitimate purposes that justified its collection, retaining such data only for the period strictly necessary to fulfill those purposes.

5.4. [ACCURACY] Adopt reasonable technical and organizational measures to ensure that Personal Data are accurate, clear, relevant, and up to date, guaranteeing the Data Subject's right to request corrections whenever necessary.

5.5. [STORAGE LIMITATION] Retain Personal Data only for the period strictly necessary to achieve the purpose for which they were collected, in accordance with Embraer's Information Retention and Disposal Policy (Doc. Emb 15166).

5.6. [INFORMATION SECURITY] Adopt appropriate technical and administrative measures to ensure the confidentiality, integrity, and availability of Personal Data, preventing Incidents and complying with the technical specifications and guidelines established by the Embraer Group.

5.7. [ACCOUNTABILITY] Implement and maintain measures that effectively demonstrate compliance with this Policy and with the applicable Personal Data Protection regulations, documenting the actions taken to ensure data protection.

5.8. [NON-DISCRIMINATION] Ensure that the Processing of Personal Data is not carried out for discriminatory, unlawful, or abusive purposes, preserving the rights and equality of all Data Subjects.

5.9. [FREE ACCESS] Guarantee Data Subjects facilitated and free access to information regarding the form and duration of the Processing, as well as to the entirety of their Personal Data processed by the Embraer Group.

5.10. [PREVENTION] Adopt appropriate technical and administrative measures to proactively prevent the occurrence of damage resulting from the Processing of Personal Data.

6. Processing of Personal Data by the Embraer Group

6.1. Data Processed

During its activities, Embraer Group may carry out the Processing of Personal Data for various legitimate purposes, including, but not limited to, those listed below.

Such data may be obtained directly from the Data Subjects themselves or provided by companies belonging to Embraer's corporate group, as well as by employers of clients, service providers, suppliers, or business partners, always in accordance with the applicable Legal Bases.

Some examples of the types of Personal Data that Embraer may access in the performance of its activities include:

a. Name and last name

b. Job title or function

c. Identification document details — including, but not limited to, ID number, IndividualTaxpayer Registry (CPF), or Passport number

d. Email address

e. Address

f. Date of birth

g. Nationality

h. IP address

6.2. Purposes of Processing

The purposes and types of Personal Data processed by the Embraer Group vary according to the interaction and relationship that the Data Subject has with the Company.

Below are some of the Personal Data Processing activities carried out by the Embraer Group:

a) **Communicating with Data Subjects.** We process Personal Data to enable communication with Data Subjects, which includes responding to requests received through online forms, reviewing job applications, providing information about recruitment processes, and sending relevant notices — such as notifications about important maintenance on our aircraft. We may also use Personal Data to send marketing communications, in accordance with the applicable Legal Bases, for the purpose of promoting Embraer Group products, services, events, promotions, and other initiatives that may be of interest to the Data Subject.

b) **Complying with legal and regulatory obligations.** We process Personal Data to meet legal and regulatory requirements applicable to the Embraer Group, such as maintaining website access logs, complying with operational safety regulations, and adopting measures to prevent and combat money laundering, among other obligations provided by law.

c) **Performing and enforcing our contracts.** We process Personal Data to negotiate, formalize, execute, and manage contracts entered into with Data Subjects or with third parties acting on their behalf. This includes activities such as processing payments, issuing invoices, providing services or benefits, and ensuring the full performance of contractual obligations.

d) **Ensuring compliance in our operations.** We process Personal Data to ensure the effectiveness of Embraer's Integrity Program, promoting responsible management of business relationships, prevention of conflicts of interest, control over donations and sponsorships, proper management of offers, gifts, and hospitality, and compliance in contracting and conducting business with third parties — especially those who may act on behalf of the Company.

e) **Understanding our customers and promoting our products and activities.** We process Personal Data to better understand the profile, preferences, and interests of our customers and, when applicable, to inform them about products, launches, events, campaigns, or other relevant information regarding Embraer Group activities.

f) **Serving customers.** We process Personal Data to respond to requests, provide personalized service, deliver specialized technical support, and perform maintenance services with quality and efficiency.

6.3. Legal Bases for Processing Activities

The Processing of Personal Data by Embraer Group may only occur when supported by an appropriate Legal Basis, as established under the Applicable Legislation.

Each Processing activity is previously assessed to identify and record the Legal Basis that justifies it, ensuring that there is no collection, use, sharing, or storage of Personal Data without proper legal grounds.

The main Legal Bases used include:

a. Data Subject's Consent – The free, informed, and unequivocal expression by which the Data Subject agrees to the Processing of their Personal Data for a specific purpose.

Example: registration in Embraer events where the Data Subject authorizes the use of their image for dissemination in institutional channels.

b. Compliance with Legal or Regulatory Obligations – The necessity of Processing to comply with requirements imposed by law or regulation.

Example: reporting employee data to labor and social security authorities; maintaining technical records required by aviation authorities.

c. Performance of Contract or Pre-Contractual Procedures – Processing necessary for the execution or formalization of contracts to which the Data Subject is a party.

Example: collecting customer information for invoice issuance; using suppliers' bank data for payment processing.

d. Legitimate Interest – Processing necessary to meet Embraer's or third parties' legitimate interests, provided that the fundamental rights and freedoms of the Data Subject are respected.

Example: sending communications about products and services to active corporate clients; implementing service improvements based on feedback received.

e. Regular Exercise of Rights – Processing necessary for the exercise of rights in judicial, administrative, or arbitration proceedings.

Example: presenting internal communication records as evidence in litigation.

f. Other Cases Provided by Law – Including, for instance, the protection of the life or physical integrity of the Data Subject or third parties, and the protection of health in procedures carried out by medical professionals or healthcare institutions.

In all cases, the Embraer Group maintains clear and auditable records of the Legal Bases applied, as well as the analysis supporting their selection.

7. Procedures

The proper protection of Personal Data processed by the Embraer Group requires the adoption of clear, consistent, and legally compliant procedures aligned with applicable legal and regulatory requirements. These procedures aim to guide practices and behaviors necessary to ensure compliance with relevant data protection laws.

This chapter consolidates the operational guidelines that must be observed in all Processing activities. These procedures apply to all Embraer Group business units and areas and must be followed by everyone who, in any capacity, has access to or performs activities involving Personal Data on behalf of Embraer.

7.1.Enabling the Exercise of Data Subject Rights

Data Subjects have fundamental rights guaranteed by data protection laws. Within the Embraer Group, we recognize and respect these rights, which are essential to ensuring the protection of privacy and transparency in the Processing of Personal Data.

The management and handling of Data Subject requests are carried out through the OneTrust platform, adopted as Embraer's official tool for registering, triaging, and responding to such requests.Data Subjects may access the Service Portal directly through Embraer's Privacy Policies or other institutional channels made available by the Company.

The Legal Innovation and Technology Department is responsible for coordinating the requesthandling process in OneTrust, performing the initial analysis of each request, verifying its legitimacy, and engaging the relevant internal departments to obtain information or implement the requested measures.

As established under the Applicable Legislation, Data Subjects may exercise, among others, the following rights:

a. Confirmation of Processing and Access: Request by the Data Subject for confirmation as to whether their Personal Data are being processed, as well as the possibility of requesting a copy of the Personal Data held by the Embraer Group.

b. Rectification: Request by the Data Subject to correct Personal Data being processed by the Embraer Group or by Third Parties to whom the Embraer Group has transferred such data.

c. Erasure: The Data Subject may request the deletion of unnecessary, excessive, or unlawfully processed Personal Data by the Embraer Group. If such Personal Data have been shared with third parties, the Embraer Group is responsible for informing them of the Data Subject's request, except in cases where such communication is demonstrably impossible.

d. Objection: The Data Subject may object to the Processing carried out by the Embraer Group when such Processing is based on a Legal Basis other than consent, without necessarily having to state the reason for the objection. These cases may include, for instance, Processing based on the legitimate interests of the Embraer Group or third parties, or the reuse of data for a purpose different from that which justified its original collection.

e. Restriction of Processing and Withdrawal of Consent: The Data Subject may request the restriction of the Processing of their Personal Data, as permitted by applicable legislation and the Embraer Group's Compliance guidelines, or withdraw their consent to such Processing.

f. Refusal to Provide Consent: The Data Subject has the right to refuse to provide consent when requested, being informed of the consequences of such refusal.

g. Anonymization, Blocking, or Deletion: The Data Subject may request that their data be: (a) anonymized, so that they can no longer be associated with the Data Subject and therefore cease to be considered Personal Data; (b) blocked, temporarily suspending the possibility of Processing; or (c) deleted, in which case the data will be permanently erased, except in situations provided for by law.

h. Information on Data Sharing: The Data Subject may request information regarding the sharing of Personal Data performed by the Embraer Group. This Policy provides examples of the purposes for which Personal Data may be shared. In any case, if the Data Subject has questions or requires additional details, they have the right to request further information.

i. Data Portability: Upon request by the Data Subject, the Embraer Group shall transfer the Personal Data to another company, regardless of whether it belongs to the same corporate group, or provide the Data Subject—or a designated third party— with their data in a structured, commonly used, and machine-readable format.

j. Review of Automated Decisions: In cases involving automated decision-making, the Data Subject may request a review of such decision.

As a security measure to ensure that Personal Data are not disclosed to any individual who is not authorized to receive them, it may be necessary to request specific information from the Data Subject to confirm their identity and ensure the effective exercise of their rights.

The exercise and scope of these rights will be assessed and fulfilled in accordance with the Applicable Legislation in each jurisdiction, considering the specific regulatory requirements and local data protection rules.

7.2. Compliance with Information Security Rules

The Embraer Group employs cybersecurity mechanisms and procedures across its corporate systems, business processes, and software products. These procedures and mechanisms are based on market best practices (such as the NIST SP 800 and ISO 27001 frameworks) and undergo periodic reviews to ensure the Company's ability to detect, control, and respond to potential threats.

It is important to note that no mechanism is entirely infallible or capable of completely preventing cybersecurity threats from materializing. However, the Embraer Group acknowledges that the protections necessary to enable its business operations — with an appropriate level of security for Data Subjects and their data — are in place and are continuously reviewed.

7.3. Data Mapping

Data mapping is an essential component of the Embraer Group's effective management of Personal Data protection. This process allows for the comprehensive identification and documentation of all sources, flows, and purposes of Personal Data Processing, ensuring that all practices comply with applicable data protection legislation.

The Record of Processing Activities (RoPA) is a core element of this process. It is a detailed register of all Personal Data Processing activities performed by the Embraer Group. Maintaining an updated RoPA is not only a legal requirement but also an essential practice for identifying and analyzing data flows, ensuring that the Company remains compliant with data protection regulations.

Each business area must keep its information updated by recording new activities and relevant changes in the OneTrust platform. The Legal Innovation and Technology Department coordinates

biannual general reviews, without prejudice to each area's ultimate responsibility for the accuracy and timeliness of its data.

Each business area is responsible for maintaining up-to-date information regarding the activities under its management, completing the register whenever new Processing operations occur and proactively updating data in OneTrust in the event of relevant changes, such as modifications to purpose, Legal Basis, categories of data, or sharing with third parties.

In addition to these on-demand updates, the Legal Innovation and Technology Department acts as a facilitator in the process, conducting a biannual general review of the registers to support the business areas in verifying the completeness and consistency of the information, as well as implementing adjustments resulting from regulatory, organizational, or technological changes.

7.4. Conduct Data Protection Impact Assessments and Legitimate Interest Assessments

The Data Protection Impact Assessment (DPIA/RIPD) and the Legitimate Interest Assessment (LIA/TLI) are instruments used to evaluate risks and ensure that the Processing of Personal Data complies with the Applicable Legislation. Both are prepared and stored on the OneTrust platform.

The DPIA/RIPD must be carried out whenever a Processing operation presents a potentially high risk to the fundamental rights and freedoms of Data Subjects, taking into account general criteria (e.g., large-scale processing, significant impact on interests or fundamental rights) and specific criteria (e.g., use of sensitive data, data of children or adolescents, automated decision-making, or surveillance in public areas). Its objective is to identify risks, propose mitigation measures, and document compliance.

The LIA/TLI must be carried out whenever legitimate interest is adopted as the main Legal Basis for a Processing activity, ensuring that the use of this basis is necessary, proportionate, transparent, and does not infringe upon the rights of Data Subjects. It must be prepared prior to the start of the activity or whenever there are significant changes to the operation.

7.5. New Project Assessment Procedures – Privacy by Design

Within the Embraer Group, all projects - particularly those related to new products, software, and IT systems that involve the Processing of Personal Data - must adhere to the principles and provisions of the applicable legislation, ensuring the protection of Data Subjects' privacy and Personal Data.

Privacy by Design methodology must be incorporated into all phases of a project, from conception through implementation. This approach aims to integrate privacy and Personal Data protection from the very beginning of development, ensuring that these matters are considered and addressed throughout the entire project lifecycle.

The application of the Privacy by Design methodology requires that, in any new project or in the event of significant changes to existing projects involving the Processing of Personal Data (such as the addition of new functionalities or data categories), the responsible area must take into account the aspects outlined in this Policy and in the applicable legislation, consulting the Data Protection Officer whenever necessary.

The adoption of Privacy by Design methodology is governed by the Privacy by Design Manual (Annex I), a corporate document that guides the systematic application of privacy principles from conception and by default.

7.6. Follow the Cybersecurity Incident Response Procedure at Embraer

In the event of any Incident, the procedures set forth in the Cybersecurity Incident Response Procedure at Embraer (Doc.Emb 7531) must be immediately activated. This procedure must be read and interpreted in conjunction with this Policy.

7.7. Comply with Corporate Rules for International Transfers of Personal Data

An international transfer is any sharing of Personal Data with recipients located outside the national territory, including situations such as the engagement of foreign suppliers, the use of servers located in other countries, or the transfer of data to Embraer's parent companies, subsidiaries, or affiliates abroad.

Within Embraer, all international transfers of Personal Data must comply with the applicable regulations. The main guidelines include:

- **Prioritize jurisdictions with adequate protection:** Prefer transferring Personal Data to countries or international organizations that ensure a level of protection equivalent to or compatible with that established under the Applicable Legislation.
- **Standard contractual clauses:** Whenever applicable, include the standard contractual clauses published by the Data Protection Authority, incorporating all mandatory provisions and observing the specific annexes of the relevant regulation. • **Valid**

contractual instruments: Ensure that the transfer is formally established in a contract or other valid legal instrument, duly approved by Embraer's competent departments, guaranteeing clarity regarding the responsibilities of the parties involved and the applicable protection measures.

To govern the sharing of Personal Data between Embraer Group companies located in different countries, the Company adopts an Intragroup Agreement for International Transfer of Personal Data.

7.8. Maintain Active and Accessible Communication Channel for Data Subjects

Data Subjects may submit any questions or complaints regarding their data protection rights to the Embraer Group via the email address data.privacy@embraer.com

Data Subjects may also report violations or suspected violations related to data protection through Helpline – the Whistleblower Channel, available at www.embraerhelpline.com

The Embraer Group must provide a response within a reasonable timeframe, in accordance with local legal requirements.

7.9. Ensure Compliance When Sharing Data with Third Parties

In its operations, the Embraer Group works with partners and suppliers who assist in various activities and, for this reason, may have access to Personal Data controlled by the Embraer Group.

In summary, the Embraer Group shares Personal Data with third parties only when there is an appropriate Legal Basis, adequate contractual safeguards, and for specific purposes, as outlined below.

a. Technology Services: The Embraer Group relies on a number of suppliers that enhance our technological infrastructure. For example, we use data hosting services to store part of our databases and data intelligence services to improve efficiency. Partners are authorized to use Personal Data only for the specific purposes for which they were contracted. Such sharing occurs to fulfill our legitimate interests or to perform a contract with the Data Subject, as applicable.

b. Suppliers: The Embraer Group engages suppliers who may process the Personal Data we collect. These suppliers are carefully vetted and are required to enter into contracts containing strict information security and Personal Data protection obligations. Among these

suppliers are companies operating in the following sectors: (i) physical security; (ii) advertising and marketing agencies and tools; (iii) healthcare and employee benefit service providers; and (iv) consulting and auditing firms that help the Embraer Group maintain compliance in its processes.

c. Embraer Group and Related Companies: Some Personal Data may be shared among companies and business units within the Embraer Group. We do this to: (i) meet the legitimate interests of the Embraer Group and its affiliates; (ii) support and develop new products and business initiatives; (iii) exchange experiences and best practices; (iv) perform data analysis; and (v) for other compatible purposes.

7.10. Follow the Guidelines of the Retention and Disposal Policy

Embraer manages the lifecycle of Personal Data securely and in compliance with applicable legislation. Disposal, whether physical or digital, follows the Information Retention and Disposal Policy (Doc.Emb 15166) and must be recorded to ensure traceability. Retention periods are defined and updated in the RoPA by the responsible area. Disposal occurs when the purpose has been achieved, upon a legitimate request from the Data Subject or contracting party, or pursuant to a judicial or administrative order.

8. Estrutura de Governança Corporativa

Embraer's Governance Program is supported by an integrated structure composed of different stakeholders with complementary roles. The core element is the **Privacy and Data Protection Committee**, responsible for strategic decisions and for aligning privacy and data protection initiatives.

- **Privacy and Data Protection Committee:** A collegiate and cross-functional body responsible for making strategic decisions, resolving significant conflicts, overseeing internal controls, and promoting a culture of privacy.

- **Data Protection Officer (DPO):** The main point of contact with Data Subjects and the Data Protection Authority, responsible for coordinating communications, supporting internal departments, and proposing improvements to the Program.

- **Data Protection Working Group:** Composed of representatives from various departments, it provides technical support, disseminates best practices, monitors the implementation of the Committee's guidelines, and proposes operational improvements.
- **Legal Innovation and Technology Department:** Manages the implementation, monitoring, and continuous improvement of the Program, develops policies and procedures, provides guidance to business areas, and monitors compliance in coordination with the DPO.
- **Information Security Department:** Defines, applies, and monitors technical protection measures, prevents and responds to incidents, and supports risk mitigation efforts.
- **Employees:** Process Personal Data ethically and lawfully, preserve its integrity and confidentiality, participate in training, and collaborate in implementing data protection tools and projects.

This structure ensures that strategic decisions, operational guidelines, and compliance actions are integrated and coordinated across the entire organization.

9. General Provisions

9.1. Sanctions

Embraer Group and its Employees may be investigated by regulatory authorities in different jurisdictions and, depending on the circumstances, may be subject to administrative, civil, or criminal proceedings. This may result in substantial fines, severe penalties, exclusions, or other sanctions if the Company or its Employees violate personal data protection laws or regulations.

Any Employee found to be in violation of this Policy will be subject to disciplinary measures.

Third Parties found to be in violation of this Policy will be subject to termination of their commercial relationship, without prejudice to any other legal or remedial actions available to the Embraer Group under applicable law and contractual terms.

9.2. Non-Retaliation

Under no circumstances will the Embraer Group tolerate retaliation, reprisal, or harassment — explicit or implicit — by any Employee against any individual, whether an Employee or a Third

Party, for any good-faith communication related to: (i) actual or potential violations of this Policy; or (ii) actual or potential violations of any applicable federal, state, or local law or regulation covered by this Policy.

In accordance with this Policy, the Code of Ethics and Conduct, and any other relevant internal policies, the Embraer Group will take appropriate action against any Employee who violates this non-retaliation statement.

9.3. Policy Review

This Policy and the procedures related to it shall be reviewed by the Privacy and Data Protection Committee every two years, and, additionally, whenever there is a legislative change related to this subject.

9.4. Questions and Reports

Any questions or reports of non-compliance with this Policy must be immediately submitted via email to data.privacy@embraer.com

9.5. Effectiveness

This Policy takes effect as of its publication date and may be amended at any time at Embraer's discretion.

9.6. Subsidiaries and Joint Ventures

The implementation of this Policy must comply with the local legal and regulatory requirements of Embraer's Subsidiaries and Joint Ventures. No changes shall alter the core principles of this Policy.

9.7. Responsible Department – Legal Department:

The Legal and Compliance Vice-Presidency of Embraer, through the Corporate Legal Department, is the owner of this Policy and is responsible for maintaining and managing it consistently. This area also leads the activities defined in and related to this Policy, in coordination with the development of the Privacy and Data Protection Committee's initiatives.

9.8. Amendments

This Policy is subject to amendments as deemed necessary and appropriate, upon recommendation of the Privacy and Data Protection Committee, based on changes in Embraer Group's applicable policies or releva