	<b>Rules and Procedures</b>	Code:	0.00.00.004
	<b>Anti-Harassment and Anti-Discrimination Policy</b>	Area in charge:	<i>Compliance</i>
		Issued in:	August/2022
		Classification:	Internal/External

## 1. OBJECTIVE

1.1. The Anti-Harassment and Anti-Discrimination Policy establishes the rules and guidelines applicable to the ethical conduct of Employees in order to create a workplace marked by dignity, decency and respect and which is free of any harassment and discrimination (Policy).

## 2. APPLICATION AND SCOPE

2.1. The Policy applies to all Employees of the Cosan Business Group and to Third Parties.

## 3. GUIDELINES

### 3.1. DISCRIMINATION


3.1.1. The Cosan Business Group values respect for the fundamental rights and diversity of its Employees. As such, the following are characterized as violations of this Policy, the Human Rights Policy and the Code of Conduct of the Cosan Business Group: (1) discrimination in offering job opportunities or benefits; (2) anything that creates discriminatory work conditions; or (3) that employs discriminatory job evaluation standards if the basis of such discriminatory treatment is, in whole or in part, social or geographic origin, physical or mental disabilities, ideas, color, race and ethnicity, religion, sexual orientation, gender identity and expression, age, educational background, body or appearance.

3.1.2. Any discrimination in violation of this Policy, the Human Rights Policy and the Code of Conduct of the Cosan Business Group will be subject to disciplinary measures in accordance with the Disciplinary Measures Policy.

### 3.2. HARASSMENT

3.2.1. The Cosan Business Group repudiates any form of harassment and will take appropriate measures immediately in response to any complaints or known violation of this Policy.

3.2.2. For the purposes of this Policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an Employee or any person who works for or on behalf of the Cosan Business Group.

	<b>Rules and Procedures</b>	Code:	0.00.00.004
	<b>Anti-Harassment and Anti-Discrimination Policy</b>	Area in charge:	<i>Compliance</i>
		Issued in:	August/2022
		Classification:	Internal/External

3.2.3. The situations of harassment provided below are merely examples and are not exhaustive:

- **Verbal harassment** includes offensive or undesired comments related to social or geographic origin, physical or mental disabilities, ideas, color, race and ethnicity, religion, sexual orientation, gender identity and expression, age, educational background, body or appearance, including offenses and negative stereotypes;
- **Non-verbal harassment** includes the distribution, display or discussion of any written or graphic material that ridicules, harms, insults, belittles or demonstrates hostility, aversion or disrespect to an individual or group based on social or geographic origin, physical or mental disabilities, ideas, color, race and ethnicity, religion, sexual orientation, gender identity and expression, age, educational background, body or appearance.

### 3.3. SEXUAL HARASSMENT


3.3.1. Sexual Harassment is a form of illegal discrimination at the workplace and is prohibited by this Policy and the Code of Conduct of the Cosan Business Group. According to the U.S. Equal Employment Opportunity Commission (EEOC), Sexual Harassment is defined as *unwelcome sexual advances, requests for sexual favors and other verbal or physical harassment of a sexual nature when the submission to or rejection of such conduct by an individual is used as a basis for employment decisions... or such conduct has the purpose of creating an intimidating, hostile or offensive working environment.*

3.3.2. Sexual Harassment occurs when there are unwelcome or undesired sexual advances, requests for sexual favors and other verbal or physical harassment of a sexual nature in the following situations:

- when it is explicitly or implicitly made as a condition for employment;
- when it is used as the basis for an employment decision;
- when it interferes with the work performance of an Employee or creates an intimidating, hostile or offensive work environment.

3.3.3. The following situations of Sexual Harassment are merely examples and are not exhaustive:

- **Verbal Sexual Harassment** includes insinuations, suggestive comments, jokes of sexual nature, sexual propositions, obscene comments and threats, requests for any type of sexual favor (including repeated and undesired requests for romantic encounters), as well as verbal abuse or “jokes” that are oriented towards any prohibited form of harassment, including that is sexual in nature and not welcome;

	<b>Rules and Procedures</b>	Code:	0.00.00.004
	<b>Anti-Harassment and Anti-Discrimination Policy</b>	Area in charge:	<i>Compliance</i>
		Issued in:	August/2022
		Classification:	Internal/External

- **Non-Verbal Sexual Harassment** includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility towards an individual or group because of their gender; suggestive or insulting sounds; malicious look; whistling; obscene gestures; content in lyrics, notes, emails, photographs, text messages, messages on social media, internet or instant messaging apps of smartphones; or any other form of communication of sexual and offensive nature;

- **Physical Sexual Harassment** includes undesired physical contact, including, but not limited to, touching, tickling, squeezing, fondling, brushing against someone, hugging, kissing and having forced intercourse or actual sexual assault.


3.3.4. Polite, respectful, pleasant and noncoercive interactions among Employees that are appropriate for the workplace, when accepted and welcomed by both parties involved, are not deemed harassment, including Sexual Harassment.

### 3.4. ROMANTIC RELATIONSHIPS

3.4.1. The Cosan Business Group strongly discourages romantic or sexual relationships between an Employee holding a management or supervisory position and a member of their team (an Employee who reports directly or indirectly to such person), since these relationships tend to create an impression that the loyalty and objectivity of the Employee are compromised in the performance of their functions, i.e., it creates compromising or apparent conflicts of interests (see the Policy on Related Parties and Conflict of Interests).

3.4.2. Such relationships could make others believe that there is favoritism or bias in the employment decisions that affect the Employee. Moreover, given the power imbalance within such relationships, the Employee's consent may be perceived as the result of coercion or intimidation.

3.4.3. If any Employee of the Cosan Business Group is involved in a consensual romantic or sexual relationship with a member of their team (an Employee who reports directly or indirectly to them) or if one of them holds a supervisory position in the same department where the other works, the parties must notify the People team and Legal Compliance department. This requirement does not apply to Employees who do not work in the same department or if neither of them supervises or manages the responsibilities of the other.

	<b>Rules and Procedures</b>	Code:	0.00.00.004
	<b>Anti-Harassment and Anti-Discrimination Policy</b>	Area in charge:	<i>Compliance</i>
		Issued in:	August/2022
		Classification:	Internal/External

#### 4. PENALTIES

4.1. Any violation of this Policy could result in civil and administrative liability for the Cosan Business Group, as well as criminal, civil and administrative liability for the individuals involved, whether by material action or omission, in unlawful activities.

4.2. Any suspected violation of the procedures herein by Employees or Third Parties will be investigated by the Compliance Committee and evaluated by the Audit Committee or equivalent body, in accordance with their respective charters.

4.3. Employees who have violated the procedures herein will be subject to the disciplinary sanctions provided for in the Disciplinary Measures Policy and the Code of Conduct, without prejudice to the Cosan Business Group seeking other administrative, civil and criminal measures, as applicable.


4.4. Third Parties in violation of this Policy will be subject to the applicable contractual commercial sanctions, including immediate contractual termination, with imposition of penalties arising from the termination, without prejudice to seeking action for damages and any other applicable legal remedies.

#### 5. REPORTING AND QUESTIONS

5.1. All Employees and Third Parties are responsible for complying with this Policy. Suspected cases of violation or questions about compliance with this Policy or the Code of Conduct may be reported to your immediate leader, the Legal Compliance area or the People team, through the communication channels (0800 725 0039 or [www.canaldeetica.com.br/cosan](http://www.canaldeetica.com.br/cosan)).

5.2. The Cosan Business Group does not tolerate retaliation against anyone, internal or external, who reports, in good faith, any known or suspected violation of this Policy or of its Code of Conduct, and guarantees confidentiality of the identity of anyone who reports such violation. The practice of retaliation is subject to disciplinary measures that could also result in termination of the Employee or of the contract, as applicable.

5.3. All complaints and investigations are kept confidential, and the identity of the whistleblower is preserved to the extent applicable within the investigation. All information related to a complaint or investigation under this Policy will be maintained safe within the Whistleblowing Channel of the Cosan Business Group.

	<b>Rules and Procedures</b>	Code:	0.00.00.004
	<b>Anti-Harassment and Anti-Discrimination Policy</b>	Area in charge:	<i>Compliance</i>
		Issued in:	August/2022
		Classification:	Internal/External

## 6. Penalties

6.1. As for Employees, any violation of the procedures of this Policy will be examined by the Committee, which will submit a report with recommendations that may subject the offender to adequate disciplinary sanctions in accordance with the internal rules of the Cosan Business Group established in the Disciplinary Measures Policy and the Code of Conduct, without prejudice to the Cosan Business Group adopting applicable administrative, civil and criminal measures, as applicable.

6.2. In the case of Third Parties, any violation of this Policy or applicable laws could result in the immediate termination of the contract, with application of penalties arising from the termination, without prejudice to action for damages and any other applicable legal remedies.

## 7. GENERAL PROVISIONS

7.1. This Policy was approved by the Board of Directors, as provided for in the Bylaws.

7.2. This Policy will be reviewed periodically for improvements and may be amended whenever the Cosan Business Group deems it necessary and/or when there is any change in the applicable laws. Any amendments to this Policy will be promptly disclosed.

7.3. This Policy, its amendments and updates will be widely disseminated across the internal communication channels of the Cosan Business Group, in an electronic version.

7.4. This Policy will be filed at the headquarters of the Company and may be replaced or revoked by a decision of the Board of Directors.


7.5. This Policy revokes any provisions otherwise.

## 8. DEFINITIONS

**Ascending Vertical Moral Harassment:** Committed by a subordinate or group of subordinates in relation to their hierarchical superior.

**Co-Subsidiaries:** Companies in which Cosan has shared controlling interest.

**Compliance:** The internal compliance area of the Company, set up pursuant to the Compliance Policy.

	<b>Rules and Procedures</b>	Code:	0.00.00.004
	<b>Anti-Harassment and Anti-Discrimination Policy</b>	Area in charge:	<i>Compliance</i>
		Issued in:	August/2022
		Classification:	Internal/External

**Cosan Business Group:** Cosan S.A. and its subsidiaries, associated companies and affiliates.

**Descending Vertical Moral Harassment:** When an employer (or their representatives) engages in abusive conduct, resulting in embarrassment of their subordinates. Correct exercise of disciplinary power should not be confused with moral harassment and psychological violence in the workplace.

**Employee(s):** Person who maintains a relationship, either established in the Bylaws or under an employment contract, with the Cosan Business Group. These include members of the Board of Directors, Committees (whether or not established in the Bylaws) and the Statutory Board of Executive Officers, as well as all full-time and temporary employees, outsourced workers and interns.

**Horizontal Moral Harassment:** Committed by persons at the same hierarchical level, without any relationship of subordination or interdependence.

**Mixed Moral Harassment:** Committed jointly by hierarchical superiors and persons at the same hierarchical level.

**Sexual Harassment:** In accordance with article 216-A of the Brazilian Penal Code, sexual harassment is the act of “embarrassing someone in order to obtain sexual advantage or favor, with the perpetrator taking advantage of their superior hierarchical position or leadership inherent to the performance of the job, position or function.”

**Subsidiaries:** Companies in which Cosan directly or indirectly holds control.

**Third Parties:** clients, business partners, intermediaries, proxies, subcontractors and suppliers of goods and services, whether direct or indirect, of the Cosan Business Group, as well as their shareholders.

## 9. REFERENCES

Cosan Code of Conduct;  
 Brazilian Penal Code;  
 Human Rights Policy;  
 Cosan’s Disciplinary Measures Policy;  
 Policy on Related-Party Transactions and Conflict of Interests.