

## **1. PURPOSE**

The Personal Data Privacy Policy (Policy) aims to establish rules and guidelines applicable to the protection and privacy of Personal Data of Employees, Former Employees, customers, suppliers and partners (Third Parties) to which the Company has access in the course of its business activities or due to legal requirements, establishing the applicable rules on the processing of Personal Data, in accordance with the national laws in force, in particular, but not limited to, Law No. 13,709, of August 14, 2018 (Data Protection Law or LGPD). This Policy provides additional instructions in support of the principles set forth in the Company's Code of Conduct.

## **2. SCOPE**

**2.1.** This Policy applies to all Employees, Former Employees, Administrators, customers, suppliers of goods and services and partners (Third Parties) who have access to Personal Data held by the Company; and

**2.2.** All Subsidiaries shall define their guidelines based on the terms set forth in this Policy, considering the specific needs and the legal and regulatory aspects to which they are subject to.

## **3. GUIDING PRINCIPLES AND COMMITMENTS**

**3.1.** This Policy aims to demonstrate the Company's commitment to:

**3.2.** Ensuring the protection of the Personal Data collected from customers, Employees, Former employees and partners of the Company in the course of their activities;

**3.3.** Adopting guidelines that ensure comprehensive compliance with good standards and practices related to the protection of Personal Data;

**3.4.** Promoting transparency about how the Company processes Personal Data; and

**3.5.** Adopting protective measures to mitigate the risk of a security incident involving Personal Data.

## **4. INFORMATION COVERED BY THIS POLICY**

### **4.1.** This Policy applies to Personal Data that is:

- a) provided or collected in the course of the Company's activities, including the collection, transmission and processing of information, the settlement of transactions, as well as the provision of other related services and products;
- b) related to Administrators, Employees, Former Employees and Third Parties collected based on the legal bases established under the LGPD, in particular related to the performance of a contractual or legal obligation, for the regular exercise of rights, or, when necessary, collected with the Data Subject's prior consent; and
- c) collected and processed for the legitimate interests of the Company, except when there is a disproportion between the Company's legitimate interest as Data Controller and the fundamental rights and freedoms of the Data Subject.

## **5. PERSONAL DATA COLLECTED, MEANS AND PURPOSE OF COLLECTION**

**5.1.** Personal Data will be collected by ethical and legal means and stored in a secure and controlled environment, for the period required by current regulations. The Company undertakes to take all appropriate measures to maintain the confidentiality of all information and Personal Data to which it has access from its Employees, Former Employees and Third Parties, as well as from individuals directly related to them and to which it may have access in the course of its activities, and it is forbidden to assign and/or allow access by third parties to such information, except for the legally required cases described in this Policy.

**5.2.** The access of the Third Parties listed below, but not limited to, to the information collected by the Company is exclusively allowed for meeting the purposes informed in this Policy and within the limits necessary for the performance of activities in the normal course of its business and in compliance with the law.

- i. Service providers or partners that perform business operations and/or Personal Data processing on behalf of the Company;

- ii. Independent auditors; and
- iii. Competent regulatory bodies.

**5.3.** The use of the Personal Data collected by the Company, in any of the cases set out in item 6.1 of the Policy, is carried out exclusively to fulfill the purposes described in this Policy in the course of the Company's activities or for the provision of specific content based on the use of anonymized and aggregated information relating to its area of operation;

**5.4.** The Cosan Group may share, based on its legitimate interest, within the same corporate group, (and/or for Data Processors acting on its behalf) Personal Data of legal representatives of its customers, partners, product suppliers or service providers, limited to their name, corporate e-mail and telephone number, for purposes related to the contracts entered into between the parties, in connection with their relationship as legal entities.

**5.5.** Whenever it is necessary to process the Personal Data collected by the Company for purposes other than those defined in this Policy or expressly authorized by the Data Subject, the Company will directly inform the Data Subject of this new purpose and, when necessary, will collect a new authorization; and

**5.6.** Where required by applicable law, the Company will seek the prior, free, informed, specific and unambiguous consent of the Data Subject (before collecting any Personal Data).

## **6. RELATIONSHIP WITH THIRD PARTIES**

**6.1.** The Company requires all Third Parties to maintain the confidentiality of Personal Data shared with them or to which they have access in the course of their activities, as well as to process such information exclusively for the purposes expressly permitted and in a secure manner. However, the Company will not be responsible for the improper process of such Personal Data, either by Third Parties or by their Employees, due to non-compliance with the applicable legislation, this Policy and the contractual obligations assumed by such Third Parties with the Company through their own instruments.

## **7. RIGHTS OF THE DATA SUBJECT**

**7.1.** The Company will provide the Data Subject with a specific channel to submit requests regarding their rights, as provided for under the LGPD, pursuant to Article 18 of the LGPD, as follows:

- i. Confirmation of the existence of processing of the Data Subject's Personal Data;
- ii. Access to Personal Data;
- iii. Correction of incomplete, inaccurate or outdated Personal Data;
- iv. Anonymization, blocking or deletion of Personal Data that is unnecessary, excessive or processed in violation of the LGPD;
- v. Portability of Personal Data to another service or product provider;
- vi. Deletion of Personal Data processed with the consent of the Data Subject;
- vii. Obtaining information about the public or private entities with which the Company has shared the Data Subject's Personal Data;
- viii. Information about the possibility of refusing to provide consent and the consequences thereof; and
- ix. Withdraw of consent.

**7.2.** All reasonable efforts will be made to comply with requests submitted by the Data Subject within the legal deadline.

**7.3.** The Company may reject, in a justified manner and under the terms of the applicable legislation, the request of the Data Subject for legal reasons (for example, the request for the deletion of essential Personal Data to the maintenance of the contractual relationship), or even for formal reasons (for example, the inability to confirm your identity).

## **8. DATA ACCURACY AND STORAGE LIMITATION**

**8.1.** The Company will ensure that the Personal Data is processed with the accuracy and quality necessary to comply with the applicable legal basis for its use, including consent requirements, where applicable. In addition, the Company will retain Personal

Data only for as long as necessary to fulfill the purposes for which it is processed and in accordance with applicable law, and will delete such data in accordance with the law and the Company's internal policies.

## **9. SECURITY OF PERSONAL DATA**

**9.1.** In order to ensure the security of the Personal Data processed, the Company will use its best efforts to implement and maintain appropriate technical, organizational physical, logical and administrative security measures compatible with the nature of the Personal Data collected.

**9.2.** The Company will seek the continuous implementation of new procedures and technological improvements to protect the Personal Data collected.

**9.3.** All actions involving the processing of Personal Data, whether carried out manually or automatically, must be subject to specific access and tracking controls, in order to protect Personal Data against unauthorized access and accidental or unlawful situations of destruction, loss, alteration, or any form of inappropriate or unlawful processing.

**9.4.** Notwithstanding the security measures implemented, the Company is not responsible for losses arising from the violation of the Personal Data's confidentiality due to the occurrence of any fact or situation that is not attributable to the Company.

**9.5.** The Company seeks to comply with the requirements of security and transparency and the standards of good practices and governance and the general principles established in the LGPD.

**9.6.** All technologies used by the Company will always comply with the applicable legislation and the terms of this Policy.

**9.7.** The protection of Personal Data and its assets must be compatible with its impact on the Cosan Group, covering all processes, electronic or not. The Personal Data processed under Cosan Group's responsibility must be handled in accordance with applicable laws and internal procedures and used only for the purpose for which it was collected, avoiding the compromise of its confidentiality, integrity, availability and authenticity, including, but not limited to, when using external solutions, platforms and resources, such as: messaging applications, social networks, artificial intelligence

applications, etc. The employee is responsible for actions carried out in the processing of Personal Data owned by Cosan and/or third parties that has been entrusted to them by virtue of their professional activity, throughout the personal data life cycle. Thus, the employee shall be held accountable for such actions, including before the competent authorities and under applicable law.

**9.8.** The employees of the Cosan Group undertake an irrevocable and express commitment not to disclose, exploit, or use, directly or indirectly, for their own benefit or for the benefit of third parties, any written or verbal information, data or documents acquired, disclosed or otherwise obtained in the course of the performance of their duties. This obligation includes a special and decisive commitment to ensure the absolute confidentiality of all data related to diversity and inclusion, including, but not limited to, information concerning sex, gender identity, sexual orientation and race. Such measures are intended to ensure the security, privacy and integrity of the employees to whom such data relates, as well as to reflect the Company's ongoing commitment to promoting a work environment that respects and values diversity and inclusion.

## **10. COOPERATION WITH REGULATORY AUTHORITIES**

**10.1.** In case it becomes necessary to disclose the Personal Data of managers, Employees, Former Employees and Third Parties, whether due to compliance with the law, judicial order or a competent body that supervises the activities carried out by the Company and/or Third Parties, such information shall be disclosed only under the strict terms and within the limits required for its disclosure, and the affected Data Subjects shall be notified, to the extent practicable, of such disclosure so that appropriate protective or remedial measures may be taken.

## **11. INTERNATIONAL TRANSFER OF PERSONAL DATA**

**11.1.** The Personal Data collected by the Company may be stored and processed in any country where the Company operates or will operate or where our service providers are located. The Company will take appropriate measures to ensure that international transfers are carried out in accordance with applicable law, in order to

ensure an adequate level of protection for the Personal Data.

**11.2.** The processing of Personal Data outside the Brazilian territory will follow the terms of the General Data Protection Regulation No. 2016/679 of the European Parliament and of the Council, of April 27, 2016 ("GDPR") without prejudice to applicable supplementary legislation.

## **12. COOKIES**

**12.1.** Some of the Company's websites use data collection mechanisms called "cookies". Cookies are pieces of text that are placed on the user's computer's hard drive when they visit certain websites and applications. The Company may use cookies to obtain specific information, for example, whether the user has visited the Company's websites before or if they are a new visitor, helping the Company to identify features in which it can improve the user's experience. Cookies can enhance your online experience by saving your preferences while you visit a website.

**12.2.** The Company will inform the Data Subject what types of cookies will be collected so that the Data Subject can disable such cookie collection. When required by law, the Data Subject may visit the Company's websites and refuse the use of cookies at any time on their computer.

**12.3.** Types of cookies used:

- i. **Necessary Cookies:** These cookies are necessary for the operation of the website and cannot be disabled in our systems. Generally, they are set only in response to actions taken by the Data Subject that constitute a request for services, such as setting your privacy preferences, logging in, or filling out forms. These cookies do not store any Personal Data; and
- ii. **Advertising/Advertising Cookies:** These cookies may be set through our website by our advertising partners. They may be used by these companies to build a profile of the Data Subject's interests and show you relevant advertisements on other websites. They do not store personal data directly but are based on unique identification of the Data Subject's browser and Internet-enable device. If you do not enable these cookies,



advertising may be less targeted.

### **13. PROCESSING OF MINORS'S PERSONAL DATA**

**13.1.** The Company does not process Personal Data of minors in the course of its activities. However, the Company may collect and process Personal Data from minors (individuals under the age of 18) where they are dependents of Employees or Former Employees. In such cases, the Company will obtain the consent of the minor's legal guardian, where applicable.

### **14. ROLES AND RESPONSIBILITIES**

#### **14.1. DPO (Data Protection Officer):**

- i. Ensure that the Policy is communicated to all Employees and business partners of the Company;
- ii. Support the business areas in the implementation of policies, processes and tools;
- iii. Receive requests and provide clarification to the Data Subject in accordance with this Policy;
- iv. Carry out all communication measures with the National Data Protection Agency ("ANPD") and/or other competent bodies as well as with the Data Subject (where applicable) regarding any security incident that may entail relevant risk or damage to the Data Subject;
- v. Guide the Company's Employees and contractors regarding the practices to be adopted in relation to the protection of Personal Data;
- vi. Manage the Company's Data Privacy Program and monitor management indicators;
- vii. Adopt, together with the person responsible for the Company's information security area, the appropriate steps for crisis management and the handling of security incidents, in the event of a Personal Data breach, under the terms of the Company's internal policies; and
- viii. Assist in audits or any other assessment and monitoring activities



involving data protection.

#### **14.2. Compliance Committee:**

- i. Support the DPO in matters related to compliance with this Policy, carrying out the activities requested by the DPO and keeping the DPO informed about its activities;
- ii. Propose and monitor the implementation of appropriate communication measures for the data privacy program;
- iii. Evaluate and approve local data protection directives, as well as the rules and standards to be applied by Employees;
- iv. Suggest and monitor the implementation of policies and good practices;
- v. Supervise and make decisions regarding Personal Data processing activities that may involve risk or damage to the Data Subject, or even to Cosan;
- vi. Assist in the incident management process with respect to decision-making, impact assessment and lessons learned;
- vii. Suggest disciplinary measures, sanctions and penalties;
- viii. Propose actions aimed at the continuous improvement of data protection governance;
- ix. Investigate and supervise the application of this Policy by Cosan's Executive Board;
- x. Monitor regulatory demands related to privacy, ensuring their implementation by the DPO and other teams involved;
- xi. Propose to the DPO and the Technology Management area control points and improvements in processes related to data privacy and information security;
- xii. Monitor the execution of processes related to data privacy established by the DPO and the Compliance Committee; and
- xiii. Ensure and be responsible for the monitoring, supervision and compliance with this Policy and current regulations, adopting the appropriate measures to address any non-conformities.

**14.3. Internal areas/departments of the Company - The representatives of each area/department of the Company are responsible for:**

- i. Implementing data privacy requirements in the policies and processes under their responsibility;
- ii. Allocating the necessary resources to ensure that the requirements of this Policy are properly coordinated and implemented;
- iii. Requesting training that individuals in their respective areas are trained in the Data Privacy policy; and
- iv. Addressing Employees' questions about data privacy or report them to the DPO.

**14.4. Employees :**

- i. Participate in training sessions, workshops, meetings and other qualifications activities, aiming to expand the culture of Personal Data protection within the Company.
- ii. Comply with the provisions set forth in this Policy.

**14.5. Suppliers, Customers and Business Partners (Third Parties):**

- i. Comply with the policies, standards and procedures published by Cosan, as well as make sure that their respective employees also do so; and
- ii. Comply with the confidentiality agreements.

**15. PENALTIES**

**15.1.** Failure by the management and Employees to comply with this Policy will be examined by the Company's Compliance Committee, depending on the situation in question, with the consequent submission of an opinion with recommendations, as the case may be, to the Audit Committee or the Board of Directors, which may subject the offender to appropriate disciplinary sanctions in accordance with Cosan's internal rules set forth in the Disciplinary Measures Policy and the Code of Conduct, without

prejudice to Cosan adopting any applicable administrative, civil and criminal measures, as the case may be.

**15.2.** With respect to Third Parties, non-compliance with this Policy or applicable legislation may lead to immediate contractual termination, with the application of the penalties resulting from the termination, without prejudice to indemnification action and other applicable legal measures.

## **16. REPORTING OF BREACHES AND QUESTIONS**

**16.1.** It is the responsibility of all managers, Employees and Third Parties to ensure compliance with this Policy. Indications of breaches of its compliance or questions about compliance with this Policy or the Code of Conduct may be reported to the Employee's immediate manager, the Human Resources department, the Internal Audit or Legal Compliance, through one of the available Communication Channels (0800 725 0039 or [www.canaldeetica.com.br/cosan](http://www.canaldeetica.com.br/cosan)), or, in the case of this Policy, they can be reported directly to the DPO through the email: [dpocosan@cosan.com.br](mailto:dpocosan@cosan.com.br); and

**16.2.** Cosan does not tolerate any retaliation against any person, internal or external, who reports a violation or suspected violation of this Policy or its Code of Conduct, and confidentiality is guaranteed about the identity of any person who reports any violation. The practice of retaliation is subject to disciplinary measures that may result, including the dismissal of the Employee from Cosan or termination of a contract, as the case may be.

## **17. GENERAL PROVISIONS**

**17.1.** This Policy was approved by the Board of Directors of Cosan S.A., as provided for in the Bylaws.

**17.2.** This Policy will be subject to periodic revisions, for possible improvements and enhancements, and may also be amended whenever Cosan deems it necessary and/or where there is a change in the applicable legislation. Any modifications to this Policy must be submitted for approval.

**17.3.** This Policy, its amendments and updates will be widely disseminated

and made available on the Company's internal communication channels, in electronic version.

**17.4.** This Policy shall be filed at the Company's headquarters, and may be replaced or revoked by decision of the management of Cosan S.A.

**17.5.** This Policy repeals all provisions to the contrary.

## 18. DEFINITIONS

<b>Administrator(s):</b>	Statutory or non-Statutory Officers, members of the Statutory and non-Statutory Committees and members of the Board of Directors of Administration.
<b>Anonymization:</b>	Use of reasonable technical means available at the time of the processing of Personal Data, through which a piece of data loses the possibility of direct or indirect association with an individual.
<b>Employees(s)/ Former</b>	Administrators, as well as all employees and contractors on time full or temporary, outsourced workers, interns and young apprentices who
<b>Employees (s):</b>	maintains or has maintained a statutory or employment relationship with Company.
<b>Data Controller:</b>	legal entity that determines the purposes and means of the Processing of Personal Data
<b>Personal Data:</b>	any data that relates to an identified or identifiable individual or a person who can be identified by means reasonably likely to be used. For example, the following are considered Personal Data: name, age, gender, affiliation, physical and electronic address, document numbers, corporate identifiers ("CS" and "TR"), electronic identifiers (IP, IMEI), geolocation, profile of Internet browsing, consumption profile
<b>Data Sensitive Personnel:</b>	personal data on racial or ethnic origin, religious belief, political opinion, membership of a union or organization of a religious, philosophical or political nature, data related to health or sex life, genetic data or when linked to a natural person.
<b>Operator of Data Processor:</b>	individual or entity, under public or private law, who carries out the processing of personal data on behalf of the Data Controller
<b>Data Subject:</b>	natural person who can be identified or become identifiable, directly or indirectly, whose data is subject to Processing and who, by virtue of the LGPD, has guaranteed rights.

<b>Processing:</b>	any operation carried out with personal data, such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction.
<b>Third(s):</b>	customers, business partners, intermediary agents, attorneys, subcontractors and suppliers of goods and services, direct or indirect, of Cosan, as well as its shareholders.

## 19. REVIEW AND APPROVAL

Step	Name	Position	Version 3
<b>Elaboration</b>	Jurema Marques Gonçalves Napoli	Data Protection Lead II	
<b>Review</b>	Silvio Soares	Legal Coordinator	
<b>Approval</b>	Eunice da Silva Calvo	Data Protection Manager II (DPO)	

Approval made at the board meeting on August 03, 2023.