

Code of Conduct



Summary

President's Message	5
Citrosuco Essence	6
What is the Code of Conduct, what is it for, and when to use it?	8
1. Integrity with People	10
1.1 Human Rights	11
1.2 Harassment and Abuse of Power	12
1.3 Diversity, Equity and Inclusion	14
1.4 Health and Safety	15
2. Business Integrity and Ethics	17
2.1 Compliance with Laws, Rules and Regulation	18
2.2 Competitive	19
2.3 Anti-corruption	20
2.4 Money Laundering and Terrorist Financing	22
2.5 Personal data protection	23
2.6 Intellectual Property, Confidentiality and Information Security	24
2.7 Strict Compliance with Labor Laws	25
2.8 Use of Alcohol, Drugs and Possession of Weapons	26
2.9 Offering or Receiving Gifts and Hospitality	26

3. Integrity with Citrosuco	28
3.1 Conflict of Interest	29
3.2 Use of Company Assets	30
3.3 Sponsorships and Donations	31
3.4 Conduct Outside the Company	31
3.5 Relationship with Public Agents	32
3.6 Contributions and Political Participation	33
4. Integrity with Third Parties, the Community and the Planet	34
4.1 Our relationship with the Society	35
4.2 Our relationship with the plane	36
4.3 Relationship and Contracting of Suppliers and Business Partners	36
4.4 Relationship with Customers	37
4.5 Relationship with Shareholders and Investors	38
4.6 Relationship with Competitors and Sector Associations	39
5. Compliance	41
5.1 Management of the Code of Conduct	42
5.2 Communication and Clarifications	42
5.3 Ombudsman and Conduct Committee	42
5.4 Disciplinary Measures	43
6. Glossary	44
7. Term of Responsibility and Commitment to Citrosuco's Code of Conduct	49

President's Message

Citrosuco conducts its relationships based on integrity, generating a positive impact on the planet and on people, fostering the innovation, driving competitiveness and sustainable growth. This is how we live, daily, our Purpose of **Nourishing Life, Living Legacies**.

We entrust all our employees and leaders with a commitment to act in accordance with our business ethics guidelines and in accordance with the expected conduct.

For this, we have our Compliance Program, and the Code of Conduct, which is an essential pillar of the Citrosuco's Program.

The Code of Conduct is the guide that materializes the paths that guide the conduct of integrity in our daily lives and the correct way to relate to our employees, suppliers, customers, communities, and other business partners.

In order to continue **Nourishing Life, Living Legacies**, in addition to reading and understanding the Code, we hope that everyone reflects on the guidelines contained herein, so that they become a relevant source of inspiration and permanent practice for everyone!




Marcelo Abud
CEO Citrosuco



Citrosuco Essence

Our **Purpose** is
to nourish life, living legacies.
As such, we are a positive impact
company by nature, going far
beyond juice. We work to feed
people and promote good for
the planet and society, and thus,
nourishing life, we live in the
present the legacies that we will
take to the future.

We reflect on our values and on our way of being the basis for all our actions: 



Integrity:

we act according to what we believe, doing the right thing, with ethics, transparency and respect;



People:

we nurture diverse and open relationships as it is people who bring our Purpose to life;



Safety:

we share our lives in a genuine way and ensure safety for life: physical and food;



Health:

we take care of health: of people, relationships, and the planet.

Our way of being:

- ⦿ Evolution mindset,
- ⦿ Living system,
- ⦿ People who experience the Purpose,
- ⦿ Customer focus,
- ⦿ Creating shared value.



What is the Code
of Conduct, what
is it for, and when
to use it?

What is the Code of Conduct



Citrosuco's Code of Conduct is the document that establishes guidelines for conduct in accordance with our Purpose, Values, Aspiration, and Mission. All employees and third parties become aware of Citrosuco's main guidelines through it.

What is the Code of Conduct for?



This Code formalizes Citrosuco's commitment to maintaining the highest standard of ethical business conduct, with actions based on integrity, transparency, and respect, in addition to serving as a guide to instruct the conduct of all employees acting on behalf of the company and those with whom we interact, regardless of position or location.

We expect everyone to know, understand, and act in accordance with expected conduct.

How to use the Code of Conduct?



We clarify that the cases presented are examples of conduct and are not exhaustive, and there may be other situations not specified in this document. In case of doubts or if you witness any irregularity or illegality, contact the Compliance area, via the email compliance@citrosuco.com, or use the Ombudsman.

The content of this Code of Conduct is applicable to everyone who has a relationship with Citrosuco, including, but not limited to, employees, administrators, suppliers, business partners, customers, shareholders, investors, and other interested parties.



1.

Integrity with People



1.1 Human Rights

We believe that Human Rights must always be respected and the appreciation of people, with their differences and diversity, must be ensured, both in our work and business relationships, and in relation to the society in which we operate.

Respect for Human Rights must be a constant in our daily lives, in order to contribute to a work environment and to a fairer, healthier, and more plural society. We must always nurture diverse and open relationships and understand that our business and Essence are based on people.

What is expected of you?



Citrosuco values relationships based on freedom of thought and expression; appreciation of personal safety; fair and favorable working conditions; fair payments; respect for labor laws and regulations; and equal rights. Therefore, we hope that your conduct:

- Promote diversity, equity and inclusion;
- Ensure a work environment free from harassment, prejudice and discrimination;
- Take care of the integrity and physical and mental health of all;
- Create an environment and relationships where people can express themselves and be what they are, in an environment of mutual respect;
- Provide decent and safe working conditions and promote fair payments;
- Comply with labor laws and regulations;

Remember!



- We do not tolerate any type of discrimination, including, but not limited to, prejudice related to:
 - Gender: gender identity; ethnicity; color; age; physical and intellectual characteristics; sexual and affective orientation; marital status; nationality; religion; beliefs; political convictions; or other attributes intrinsic to human plurality.
 - We do not allow, under any circumstances, child labor or slave-like labor in our operations or those of our business partners.



1.2 Harassment and Abuse of Power

Citrosuco does not tolerate harassment of any nature, whether of a sexual, economic, or moral nature, as well as situations that constitute disrespect, intimidation, or threat in the relationship between employees, third parties and other interested parties, regardless of their hierarchical level.

Harassment can be defined as exposing someone to a situation of humiliation, embarrassment, or threat in a repetitive and constant basis, through words, attitudes or gestures that harm the dignity of the person or their physical or psychological integrity.

Threats, screams, defamatory nicknames, gossip and offensive comments, overload, or absence of tasks, unattainable goals, imposition of incoherent tasks, excessive control, abusive schedules, exclusion, and mockery are some examples of situations that can configure moral harassment.

Sexual harassment, on the other hand, is characterized by proposals, impositions, and flirtations that aim to obtain sexual advantage or favor. These behaviors can cause embarrassment and restriction of the person's sexual freedom.

Unwanted touching, obscene jokes, harassing jokes, insistent invitations, messages of sexual or harassing content, embarrassing comments and notes, explicit or veiled innuendo, and requests in exchange for sexual favors are forms of sexual harassment.

Abuse of power, in turn, happens when someone uses their influence, hierarchy and/or position to obtain undue advantages, for themselves or for another person.



What is expected of you?

Our company cares and values the physical and psychological integrity of our employees, third parties, and everyone who works in our chain. In this way, we expect you to commit to promoting a work environment free from harassment and abuse of power for all our employees; candidates in our selection processes; third parties and business partners; and people in the community as a whole. If you experience or witness any situation involving harassment or abuse of power, share it with your immediate manager or use the Ombudsman.

Remember!



Our company does not tolerate, under any circumstances, situations in relationships between employees of any hierarchical levels such as the following:

- Any form of abuse of power with the aim of obtaining undue advantages or that generates humiliation, intimidation, exposure to ridicule, hostility, embarrassment, discrimination, disrespect, or threat.
- Carrying out or promoting harassment of any nature including, but not limited to, harassment of a sexual, moral, psychological, or economic nature.



1.3 Diversity, Equity and Inclusion

Our company fully respects people, regardless of gender, gender identity, ethnicity, color, age, physical and intellectual condition, sexual and affective orientation, marital status, nationality, religion, beliefs, political convictions, and other attributes intrinsic to human plurality. We nurture diverse and open relationships through a work environment that values people as they are through their potential, with their different visions and experiences.



What is expected of you?

- Promote a diverse, equitable and non-discriminatory work environment by treating all employees, third parties, business partners, candidates in selection processes, and people in the community in a fair, dignified and equitable manner.
- Treat all people with respect, respecting their worldviews, always seeking to encourage this behavior and reporting it if there is any violation of the guidelines of this Code.

Remember!



We promote a work environment free from abuse, harassment, and prejudice, and therefore we do not tolerate:

- Any type of abuse, harassment, discrimination or intimidation;
- Offensive, insulting, intimidating, malicious or humiliating behavior;
- Distribution or display of offensive materials, including but not limited to inappropriate photos, videos or drawings;
- Inappropriate behavior, whether sexual, abusive, aggressive, humiliating, discriminatory or intimidating.



1.4 Health and Safety

Our company's Values includes integrity, people, safety and health. Thus, we care for a healthy and safe work environment, genuinely taking care of people. People's health and physical and mental integrity are priorities for Citrosuco.



What is expected of you?

We must ensure a healthy and safe work environment valuing:

- Be aware of the health and safety risks, and the guidelines to prevent, manage, and reduce them; aware of the health and safety risks, and the guidelines to prevent, manage, and reduce them;
- Follow established procedures, participate and engage employees to participate in training and guidance related to health, safety, and environment;
- Caring for and encouraging other employees to take care of their own physical and mental health;
- Use protective equipment properly and act consciously to avoid accidents;
- Use your right of refusal under unsafe conditions; and
- Immediately report all work accidents.

Remember!



The following behaviors are not allowed:

- Remove or disable safety devices without prior authorization, as well as carrying out repairs on machines and equipment without blocking all energy sources;
- Operate any machinery and/or equipment or carry out any activity in which you are exposed to pesticides without the use of personal protective equipment (PPE) provided by our company and/or without respecting the safety instructions;
- Driving a vehicle or equipment without wearing a seat belt and/or using a cell phone;
- Working under the influence of alcohol or other drugs that may affect your mental and motor skills.



2.

Business Integrity and Ethics



2.1 Compliance with Laws, Rules and Regulations

Our company endorses compliance with international, national, and local laws, rules and regulations applicable to our operations, so we are committed to transparency, ethics, and integrity.

Therefore, we maintain an organized system of formal records of our activities and results, following laws, regulations, company policies and procedures, principles, and national and international standards that are audited and supervised.

Remember!



In order to respect our commitment to ensure compliance with laws, rules, and regulations in all our operations and at all times, the following conduct is not permitted:

- Carry out activities that are unrelated to Citrosuco's work or informal activities that may interfere with their activities at the company;
- Obstruct or prevent the inspection and audit of our company records;
- Acting in a non-transparent and/or unclear manner in relation to our Essence, or in relation to laws, rules, and/or regulations;
- Lack of ethics in the relationship with third parties, public agents, and other interested parties.



2.2 Competitive



We defend the existence of competitive markets and compliance with current legislation to defend fair competition. We must act with integrity and ethics, and therefore, our competitive relationships must always be in accordance with applicable laws and our values.

We need to be careful in our relationship with our competitors so as not to act dishonestly or share sensitive competitive information, including the industry association meetings. We must also be aware of day-to-day situations that can be characterized as anti-competitive conduct.



What is expected of you?

- We must always ensure fair competition; therefore, we expect that all our employees:
- Learn about competitive relationships and about the permitted and not tolerated conducts, through Citrosuco's policies and procedures;
- In case of doubt, contact the Compliance area, through the email compliance@citrosuco.com, or use the Ombudsman.

Remember!



The following behaviors are not allowed:

- Exchange confidential and sensitive information with third parties and/or competitors, such as: current or future prices, profit margins, discount policies, processes, production methods and costs, sales territories, marketing plans, and growth plans amongst others.
- Financing, funding, sponsoring, or in any way contributing to the practice of negotiations that may restrict trade or free competition;
- Using an individual or legal entity to hide or disguise the practice of unfair competition;
- Fraud or manipulated contracts or bids with public authorities or in the private sphere;
- Contribute in any way to the formation of a cartel or any other anti-competitive practices;



2.3 Anti-corruption

We do not allow any conduct that contributes to the practice of corruption.

It is worth remembering that corruption is a crime and consists of the act of offering, promising, giving, requesting something of value, whether goods, values, rights, with the aim of obtaining an Undue Advantage, carrying out or maintaining a business or to influence a decision, may occur directly or indirectly, in the public or private sphere.

Thus, corruption can have serious consequences for the people involved and the company, such as:

- Administrative and judicial sanctions and penalties for the company;
- Negative impacts on the company's reputation and image, reduction of trust and credibility in Citrosuco;
- Inclusion of the company in the restricted lists;
- Payment of fines;
- Individual criminal liability of the person who committed corruption.

Thus, acting with integrity is what we expect from all our employees, inside and outside Citrosuco. To do so, you can learn more about the guidelines related to Citrosuco's anti-corruption practices by accessing our Anti-Corruption Policy and the Manual for Interaction with the Government.

Remember!



Citrosuco's employees and contracted third parties must always ensure the adoption of ethical conduct and the prevention of corruption in their activities. Therefore:

- Under no circumstances, promise, offer, authorize, or provide any type of undue advantage, including benefits, gifts, and entertainment to public agents, or any third parties related to them, even with the intention of apparently benefiting the business;
- Avoid any conduct that could be interpreted as unethical or inconsistent with the above guideline;
- Never make any types of facilitating payments with the aim of speeding up or guaranteeing routine or non-discretionary actions before public bodies;
- In case of need to hire Public Agents, Politically Exposed Persons or companies related to these people, such as a relative, to provide services or supply products, it must be carried out a risk assessment and an assessment of possible conflicts of interest. Therefore, this hiring must comply with Citrosuco's guidelines and applicable laws, since this hiring, even if legitimate, can be understood as an undue favor;
- Do not prevent or hamper any form of inspection, including those aimed at preventing and fighting corruption.



2.4 Money Laundering and Terrorist Financing

In our company, we must act to promote integrity and healthy relationships in our value chain and in the market. Therefore, we must always be aware of any acts that may be related to crimes such as money laundering and terrorist financing.

Money laundering is a crime and consists of carrying out operations to hide or disguise the illicit origin of any good or value. For which, companies, organizations, and economic activities for example, can be used to issue false invoices and sell goods or services that never occurred, among other forms of money laundering. These goods and values come from various crimes such as trafficking in people, drugs and weapons, sexual exploitation, kidnappings, and terrorism.

Similar to money laundering, terrorist financing is the crime of allocating resources, even if of a lawful origin, to terrorists, terrorist organizations or terrorist acts. The practice of these acts and the relationship with this type of organization can have serious consequences for our business and the society, including criminal conviction.

Remember!



To avoid the practice of Money Laundering or Financing of Terrorism, it is not allowed to:

- Conducting business with third parties who are not reputable or who do not have their activities or resources within the law;
- Conducting business with parties on the sanctions and embargoes lists of OFAC, UN, European Union, among others;
- Inadequate and/or false accounting and financial records in books and systems;
- Failing to periodically assess the integrity of the companies we do business with.



2.5 Personal data protection

We protect the privacy of the personal data of all those who interact with us, in accordance with applicable legislation.

Therefore, we inform the types of personal data collected, the purpose, the possibility of sharing, the security measures we have adopted for data protection, the rights of the holders and the way to exercise them.

Remember!



In order to ensure the protection of personal data, our company prohibits the following conduct:

- Improperly storing and protecting personal data;
- The unauthorized use, access or treatment of personal data by employees, administrators or third parties;
- Unauthorized viewing of accessed content;

In need of further clarifications about the processing of personal data, contact our Personal Data Officer (DPO) or access our Ombudsman and Privacy.



2.6 Intellectual Property, Confidentiality and Information Security

Information is an important asset in the conduct of business activities, and must be properly used and protected by everyone, in order to avoid its misuse and/or unauthorized use.

All information must be managed with great care and responsibility, whether it is verbal, written, video or audio recorded information, papers, documents or technological systems.



What is expected of you?

- Ensure the confidentiality of documents produced in the company, sharing only with duly authorized persons;
- Preserve the integrity of information, which cannot be modified without authorization and must always be updated;
- Everything produced by our employees is always our company's intellectual property and must be properly stored and have their confidentiality respected. Therefore, everyone must take the utmost care, attention, and responsibility with internal information.

Remember!



Do not use our company's intellectual property to obtain Undue Advantage for your own benefit or on behalf of the company.



2.7 Strict Compliance with Labor Laws

In order to ensure an environment of integrity, health and safety for all our people, we always ensure compliance with the labor laws applicable to our operations.

We act with transparency, clarity, ethics, and professionalism, and we have zero tolerance for forced and slave labor and child labor in our operations and involving third parties with whom we interact.

Remember!



We comply strictly with labor laws, and any conduct that violates these laws is not permitted, including but not limited to:

- Non-granting of vacations in the due period.
- Non-payment of earned bonuses;
- Non-granting of maternity leave.

If you notice any situation that violates labor laws, notify your manager or file a complaint through our Ombudsman.



2.8 Use of Alcohol, Drugs and Possession of Weapons

The use and possession of illicit drugs, as well as the misuse of legal drugs or other substances during working hours, is prohibited. Likewise, the exercise of the professional function and the permanence in the work environment in an altered state of consciousness is not allowed.

Weapons of any kind are not allowed on Citrusuco's premises, except for professionals expressly authorized to do so.



What is expected of you?

We are committed to the health and well-being of everyone, so you are expected to follow guidelines regarding alcohol, drugs, and possession of weapons and report any deviations observed.



2.9 Offering or Receiving Gifts and Hospitality

Giving and receiving gifts and hospitality is a common business courtesy practice, which symbolizes kindness, provided it is done in an appropriate, ethical, and legal manner. While it is a common practice, the giving and receiving of these courtesies may be related to obtaining an Undue Advantage.



What is expected of you?

- Only accept institutional gifts with no commercial value;
- Communicate third parties about company guidelines and return gifts;
- Request prior approval from the Communication and/or Marketing area when necessary to send gifts to business partners.

Remember!



It is not allowed to offer and receive gifts and hospitality in the following cases:

- Carried out by/for Public Agents and/or government agencies, and/or people involved in Conflicts of Interest, in any situation and at any time;
- For the employee's personal benefit or leisure;
- Linked to the request of an advantage;
- That are configured in any kind of money, regardless of the amount.



3.

Integrity with Citrosuco



3.1 Conflict of Interest

A conflict of interest occurs when an employee or third-party has a personal interest that conflicts with the interests of the company. This can lead to a situation in which the employee or third party cannot make impartial decisions. This conduct is not in accordance with the integrity that we seek in our relationships and can cause harm and affect the transparency of relationships, as well as the company's image and reputation.

What is expected of you?

- Act in a way that personal interests do not influence the decisions and actions we take and do on behalf of the company.
- Recognize situations that can be characterized as a conflict of interest and report it to the leadership, preventing the conflict from materializing.
- In case of doubt, seek guidance from the Compliance area.



Remember!



- It is not allowed to reserve positions, promotions, or nepotism for relatives, friends or related persons;
- It is not allowed for people with a kinship relationship up to the third degree (parents, children, in-laws, stepchildren, brothers, brothers-in-law, grandparents, grandchildren, uncles, nephews, great-grandparents and great-grandchildren) to work on the same company team and/or with a hierarchical relationship with each other;
- Preference or favoritism to business partners and/or third parties over other more technically qualified companies is not allowed;
- The hiring of former Public Agents and Politically Exposed Persons must be carried out through a prior risk assessment and an assessment of possible conflicts of interest.



3.2 Use of Company Assets

We have several assets and equipment that help our employees to carry out our operations.

The use of facilities, materials, equipment and other physical assets, including corporate credit cards, must only be for authorized purposes related to job responsibilities.



What is expected of you?

The assets granted by Citrosuco must be used only for the benefit of our company, in an appropriate way and related to the performance of the professional function, during and outside working hours, whether in the office or in a remote location.

Remember!



- Sharing individual logins and passwords between employees and/or with third parties is not allowed;
- It is not allowed to send communications that are illegal, offensive, or that may reflect negatively on the image of our company;
- The assets and information residing in the company's physical and electronic media are subject to monitoring at any time;
- It is not allowed to install programs and software without prior authorization.



3.3 Sponsorships and Donations

We pursue to create value for the business and promote positive transformations in the community in which we operate.

In this way, all donations or sponsorships must be guided by the principle of transparency, being duly approved and registered, and be directed to social, economic, educational and cultural development, respecting the guidelines set out in this Code, in the Donations and Sponsorship Policy and other company procedures.

Remember!



- Any donation or sponsorship must promote the company's institutional positioning and be aligned with the relationship strategy with stakeholders;
- Citrosuco will not donate or sponsor organizations or projects that are involved in any type of fraud, crime or illegality.



3.4 Conduct Outside the Company

In order to reinforce our commitment to integrity, it is not enough for our employees to have integrity only in our work environment.

We understand and respect the individuality of each employee and we hope that integrity is also demonstrated and reinforced outside the company, to strengthen our image and reputation, contributing to a healthy, safe and ethical environment and society.

What is expected of you?

- Behaviors aligned with the Essence and Values of our company;
- Carefully evaluate the conduct carried out in public environments,
- Acting cautiously in communication media.



Remember!



We do not tolerate participation in illicit activities in any way, whether in professional or private life.



3.5 Relationship with Public Agents

In our work activities, we often interact with Public Agents, such as when we receive an inspector, participate in a public hearing, or in licensing processes.

What is expected of you?

- Employees, third parties, and all people acting on behalf of our company must pay attention to interactions with Public Agents and government agencies, observing some specific precautions and the laws and regulations related to Corruption and the relationship between individuals and Public Agents present in the Anti-Corruption Policy and in the Public Authority Relationship Manual.
- After any interaction with a Public Agent and/or the government, our employees must record the interaction in a specific form for this purpose.



Remember!



- We do not allow, in any way, the offering, receipt, promise or solicitation, directly or indirectly, of any type of Undue Advantage to Public Agents and to any person related to them or to the government, even if it favors the company;
- We do not authorize any type of payment or advantage for the release of licenses, authorizations, permits or other benefits - Facilitation Payment;
- The offering of gifts, entertainment, and other hospitality, or the promise of reserving positions in the company, can also be seen or used as a way to influence a Public Agent or a conflict-of-interest situation and, therefore, we do not allow offering and receiving these courtesies to Public Agents.



3.6 Contributions and Political Participation

We respect and encourage our employees to be committed to citizenship and to exercise their political rights. However, we must take care not to involve Citrosuco's image and interests in our participation and political contributions.

If an employee or third party participates in political activities, they must participate in their free time, at their own expense, and without any connection with Citrosuco.

Remember!



- It is not allowed to make contributions to political parties, campaigns, candidates or people who hold public office with money, goods or services from the company or on behalf of Citrosuco.



4.

Integrity with Third Parties, the Community and the Planet

Sustainability is the essence of our business, so we operate in an integrated manner and with the aim of generating a positive impact on society and the planet, nurturing diverse relationships and influencing our entire value chain.



4.1 Our relationship with the Society

Our company is committed to promoting the social and economic development of the communities in which it is present, respecting and considering their various aspects, challenges, and vocations. Acting in the socio-economic development of the communities where we operate is part of our legacy, and we do this through positive impact interventions and partnerships throughout the chain.

What is expected of you?

- Promote social transformation, supporting actions, and voluntarily participating in Citrosuco's social projects aimed at education, citizenship and social engagement;
- Promote partnerships with organizations that work in favor of the development of communities and that seek to generate positive impacts on society.





4.2 Our relationship with the planet

We act in an integrated and systemic way in favor of the active conservation of our planet. In this way, we must:

- Ensure compliance with applicable environmental legislation;
- Lead the sustainable chain and act in agricultural management in line with the best practices and international certifications;
- Contribute to climate resilience through the use of low-carbon inputs and operational practices;
- Fostering biodiversity;
- To rationally manage water resources;
- Correctly dispose the waste;
- Always act transparently, objectively, and consciously.



4.3 Relationship and Contracting of Suppliers and Business Partners

We maintain a relationship based on integrity with our suppliers and business partners.

These third parties with whom we do business can directly affect our image and reputation, so we must remain vigilant for any signs of misconduct and violation of our Values. Thus:

- All suppliers and business partners must know, in addition to the terms of their contracts, Citrosuco's own values and policies, and act in accordance with the Code of Conduct;
- All supplier engagements must undergo a prior assessment based on objective and non-discriminatory criteria, and technical, economic, reputational, and integrity requirements will be evaluated to ensure that our suppliers and partners are in accordance with our Code and our Values;
- We do not do business with companies involved in practices of forced and slavery-like labor; Child labor; violation of Human Rights of any nature; violation of workers' rights; unsafe and/or degrading work environments; sexual exploitation; trafficking in drugs, people, or weapons; terrorism; fraud and corruption; money laundering; violation of environmental laws, and disregard for the environment.

If any violations of this Code and our company values are identified by the supplier or business partner, the business relationship may be terminated and sanctions may be applied.



4.4 Relationship with Customers

Serving our customers with transparency and respect is extremely important to our company and preserves the reliability of our products. Ethics must guide all our relationships, including the relationships formed in the sale of our products.



What is expected of you?

- Our contracts must be clear, with precise and transparent clauses, and in compliance with ethics and applicable legislation;

- The information about our products and services must always be clear and truthful. We must also always inform our customers about the truthful and necessary technical data, in particular the safety, health and environmental requirements, about our products and services, and comply with the legal requirements of the market.

Remember!



- We do not allow the offering or receiving of any type of Undue Advantage to grant discounts or facilitate the process of selling our products and services, even if it benefits the company;
- Business relationships with our customers may be terminated if any violation of this Code and our company policies and standards are identified.



4.5 Relationship with Shareholders and Investors

We base our relationship with our shareholders and investors on the accurate and transparent communication of information, observing good market practices, applicable laws and regulations, allowing the monitoring of our company's activities and performance in a clear and reliable approach.



What is expected of you?

- Always rely on accurate and transparent communications of information;
- Allow monitoring of the activities and performance of our company;
- When conducting business between our company and our shareholders, investors, and/or their family members, whether through individuals or legal entities, seek prior approval, and ensure transparency, impartiality, and no conflict of interest;
- Individuals or legal entities interested in doing business with our company must inform the existence of a relationship with our shareholders, investors, and/or their families.



4.6 Relationship with Competitors and Sector Associations

Based on integrity, our company is committed to maintaining an environment free from unfair competition. Therefore, no employee or third party is authorized to provide or request strategic and confidential information.



What is expected of you?

In interactions with competitors in industry associations and other similar events and conventions, it is necessary to follow the following precautions:

- Always request the defined agenda before the meetings, evaluate its content and eventually request the exclusion of matters involving sensitive competitive information.
- Evaluate the participation of the employee who will represent the company in relation to their attributions.
- Always request the minutes with the record of all matters discussed in the meetings.
- Inform your manager and the Compliance area, or through the Ombudsman, of any situation of improper discussions or illegal activities practiced within the scope of associations or events with competitors.

Remember!



It is not allowed:

- Participating in discussions and activities that are legally prohibited, even if approved by the group or association promoting the meeting;
- Interacting and participating in meetings and events, even if only as a listener or for market research purposes, which involve discussion of strategic and competitively sensitive information.



5.

Compliance



5.1 Management of the Code of Conduct

The Code of Conduct should be consulted whenever there are doubts and its values and guidelines should be applied in daily activities and on the decision-making. The Code may be updated at any time to reflect changes in the company's culture, business and legislation.

The approval of this Code and its updates are the responsibility of Citrosuco's Executive Board and Board of Directors.



5.2 Communication and Clarifications

Communication, clarification, or interpretation doubts related to this Code may be forwarded via the Ombudsman and/or to the Citrosuco Conduct Committee.



5.3 Ombudsman and Conduct Committee

The Conduct Committee will be responsible for handling the cases addressed to it, for establishing criteria for cases not provided for in the Code and for the proper functioning of the Ombudsman. It is part of the Committee's duties to analyze the issues sent to the Ombudsman with impartiality and seriousness, in addition to impartiality and secrecy, seeking solutions to the situations that are presented to it.

In addition, whenever there is suspicion, concern or evidence of any act, whether internally or externally, that may violate, for example, company policies and procedures, the employee and/or third party must report it through our Ombudsman. It is important to emphasize that the company does not tolerate retaliation of any kind against a person who makes a report in good faith.

Our Ombudsman is independent and allows anonymous reporting and can be accessed by internal and external audiences through the website:

Website:
www.citrosuco.com



5.4 Disciplinary Measures

Noncompliance with the provisions of this Code of Conduct or other rules of our company are subject to the application of disciplinary measures and/or legal measures.

Employees and administrators of our company are subject to the following disciplinary measures:

- Verbal warning; training; written warning; suspension; dismissal with just cause; dismissal without just cause; judicial process and/or other applicable legal sanctions, with possible civil, criminal and administrative liability.

Third parties linked to our company are subject to the following disciplinary measures, including, but not limited to, commercial and contractual sanctions:

- Application of contractual fines; suspension of purchase, services or supply; withholding payments; contractual rescission, with the penalties resulting from the rescission being applied without prejudice to other possible legal measures; judicial process and/or other applicable legal measures, with possible civil, criminal and administrative liability.

Disciplinary measures will always be applied objectively; fair; reasonable; egalitarian and proportional to the conduct practiced; and ruled by the Conduct Committee's decision based on our way of acting, with integrity.



6.

Glossary

Public Agents: Anyone who exercises, even if temporarily or without remuneration, by election, appointment, hiring or any other form of investiture or bond, mandate, position, employment or function in public bodies. Public agents can be subdivided into political, administrative, honorary, delegated and accredited agents.

Aspiration: the company vision and what we want to be recognized for.

Ombudsman: Communication channel to report irregularities or complaints, for example

Cartel: any form of coordination of decisions between competing companies, which eliminates free competition between them and seeks to obtain higher profits than would be achieved in the absence of the cartel, causing unfair competition.

Human Rights: These are rights inherent to all human beings, regardless of their race, sex, nationality, ethnicity, language, religion or any other condition. Human Rights include the right to life, liberty, freedom of opinion and expression, to work and education, among others.

Essence: The Purpose, Mission, Aspiration, Values and way of being of our company. One of the most important pillars of Citrosuco.

Terrorism Financing: Terrorist financing is the financial support, by any means, of terrorism or those who encourage, plan or commit acts of terrorism. Terrorist financing aims to provide funds for terrorist activities, and this fundraising can occur in a variety of ways, such as through personal donations or from the result of companies and charitable organizations.

Fraud: Obtaining, for oneself or for others, an unlawful advantage, to the detriment of others, inducing or keeping someone in error, through artifice or any other fraudulent means.

Money laundering: Money Laundering is a crime according to Law 9.613/98 and it consists of the use of legal operations to hide or disguise the origin of gains, whether goods, values or rights, obtained in illicit operations or to help any person involved in these illicit operations. It is hiding or disguising the nature, origin, location, disposition, movement or ownership of goods, rights or values arising, directly or indirectly, from a criminal offense.

Mission: what we deliver and how we operate as a business.

OFAC: *Office of Foreign Assets Control* (OFAC) is an agency belonging to the United States Department of the Treasury, whose main function is to administer and apply sanctions based on national and international security policies against internationally targeted countries, regimes, terrorists and traffickers.

UN: United Nations Organization

Facilitation Payment: A payment to a political party or a government official to "speed up" certain government action. The Facilitation Payment is typically used, for example, for fast processing of papers, licenses and/or other documents.

Politically Exposed Person: Public agents who perform or who have performed, in the last five years, in Brazil or in foreign countries, territories and dependencies, relevant public positions, jobs or functions, as well as their representatives, family members and other people with their close relationship.

Purpose: What drives the positive difference we make in the world.

Values: Elements that govern our culture, relationships and day-to-day decisions.

Undue Advantage: Any kind of gain, whether a profit, privilege or benefit. It can be monetary or even in the form of a promise or influence.



Ombudsman

The Ombudsman guarantees the confidentiality of information, preserving the identity of the people involved and collaborating to promote a better environment for everyone.

Access the website
www.citrosuco.com



7. Term of Responsibility and Commitment to Citrosuco's Code of Conduct

I declare that I have read, understood, and have no concerns about Citrosuco's Code of Conduct, and I understand that I should seek the necessary guidance in case of further clarifications. I assume the commitment to comply with and promote the prescribed guidelines, ensuring their application on a daily basis.

(Local, Day, Month, Year)

(Full name)

(Registration)

(Department)

(Unit)

(Signature)

