

ANTI-CORRUPTION POLICY

Tietê Agrícola Ltda | 2025

1. Introduction

Tietê Agrícola Ltda believes that integrity and ethics are fundamental pillars of sustainable business development. Accordingly, the company has zero tolerance for corruption, bribery, fraud, money laundering or any practice that could compromise its reputation, its values or the trust of employees, customers, suppliers, partners and society. This policy was developed to reinforce the company's commitment to the law, particularly Brazilian Law No. 12,846/2013 (Anti-Corruption Law), and to international standards of corporate integrity.

2. Purpose

This policy aims to establish clear guidelines to prevent, detect and combat corrupt practices at every level of Tietê Agrícola Ltda. It also seeks to ensure that all activities are conducted responsibly, ensuring transparency in internal and external processes, strengthening stakeholder trust and protecting the company's reputation.

3. Related Values and Principles

Tietê Agrícola Ltda bases its conduct on ethical principles that guide all its activities. These principles are:

- Ethics and transparency in all relationships.
- Respect for people, human rights and local communities.
- Environmental sustainability and responsible use of natural resources.
- Strict compliance with applicable laws and regulations.
- Fair and trusting relationships with customers and suppliers.
- Commitment to continuous improvement in management and business practices.

4. Scope

This policy applies to all employees, managers, suppliers, service providers, business partners, consultants, representatives and any third parties acting on behalf of or for the benefit of Tietê Agrícola Ltda, wherever the company carries out its activities.

5. Anti-Corruption Guidelines

To ensure the integrity of its operations, Tietê Agrícola Ltda establishes the following anti-corruption guidelines:

- Offering, promising, requesting or receiving any form of improper advantage is strictly prohibited.
- All business decisions must be based on technical, ethical and objective criteria, never on personal favors.
- Gifts, promotional items and hospitality may only be offered or accepted if they have low, symbolic value, do not influence business decisions and are duly recorded.
- Donations and sponsorships must be approved in advance by the Executive Management, with formal records and transparency.
- Company resources must not be used to finance political activities, unless permitted by law and expressly authorized by senior management.
- Conflicts of interest must be reported immediately to management and handled transparently.
- Relations with public authorities must be conducted ethically, transparently and always in compliance with the law.

6. Responsibilities

The effectiveness of this policy depends on everyone's commitment. Responsibilities are as follows:

- Employees: Understand, comply with and help ensure compliance with this policy.
- Managers: Lead by example, guide their teams and report irregularities.
- Suppliers and partners: Comply with the anti-corruption guidelines as a condition for maintaining the business relationship.
- Executive Management: Approve and review this policy and ensure the resources required for its implementation.
- Compliance function or equivalent: Monitor, review and investigate reports, ensuring an impartial process.

7. Relationships with Suppliers and Customers

Tietê Agrícola Ltda's business relationships must be guided by ethics, transparency and objective criteria. Supplier selection must be based on quality, cost, need and performance, with no room for favoritism, discrimination or unlawful practices. All contracts must include anti-corruption clauses and provide for termination in the event of a violation.

8. Accounting Records and Internal Controls

Tietê Agrícola Ltda maintains accurate and reliable accounting records and robust internal controls to ensure the accuracy of financial and operational information. Accounting fraud, manipulation of information or omission of data will not be tolerated. Internal and external audits are conducted periodically to ensure compliance and identify improvements.

9. Reporting Channel

Tietê Agrícola Ltda provides a secure, confidential and accessible reporting channel through which employees, suppliers, customers and third parties may report suspected misconduct or violations of this policy. The channel operates according to the following principles:

- Confidentiality: All information is treated in strict confidence.
- Anonymity: The reporting person may choose not to identify themselves.
- Impartiality: All reports are reviewed fairly and impartially.
- Protection against retaliation: No person who makes a report in good faith will suffer reprisals.
- Monitoring: Periodic reports are submitted to the Executive Management, protecting the identity of reporting persons.

Reporting process: Receipt → Screening → Investigation → Corrective actions.

10. Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary measures, such as a warning, suspension or dismissal, as well as civil and criminal legal consequences. Suppliers and partners that violate these guidelines will be subject to immediate contract termination and appropriate legal action.

11. Approval and Effective Date

This policy takes effect on the date of its approval by the Executive Management of Tietê Agrícola Ltda. It will be reviewed periodically to ensure that it remains up to date, aligned with best practices in corporate integrity and compliant with changes in the law.