



rumo



COMPASS



SÓ FAÇA
SE FOR
SEGURO!

CODE OF CONDUCT

rumo

2025

**DO THE RIGHT
THING, THE
RIGHT WAY.**



**RESPECT, INTEGRITY, AND
TRANSPARENCY DRIVE US.**

It is everyone's responsibility to understand the policies and procedures presented here. This document serves as a constant reference to guide individual and collective actions and decisions in interactions with colleagues and third parties.

Reading and adhering to the Code of Conduct is mandatory and must be formalized through an acceptance form, even when changes occur. This is also an opportunity to gain a deeper understanding of our guidelines. The information provided here prepares our team for situations that may arise in their daily work.

Our commitment doesn't end here. Training on the Code of Conduct, the Integrity Program, and our policies is integral to our commitment to guiding behavior in the right direction.

We're counting on you! You, too, are responsible for disseminating and promoting this Code of Conduct and fostering a culture of ethics and integrity.

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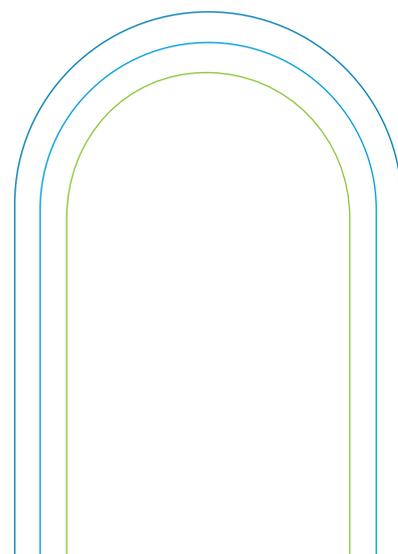
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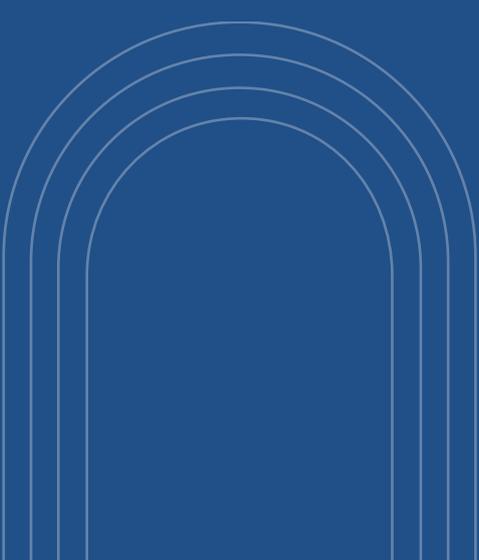
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Final Message





**WHO IS THE CODE
OF CONDUCT
FOR?**





THE CODE OF CONDUCT APPLIES TO ALL EMPLOYEES AND THIRD PARTIES.

WE CALL THEM “OUR PEOPLE”:

Employees: This includes any individual with a statutory or employment relationship with the Company. This term also encompasses members of the Board of Directors, the Supervisory Board, the Statutory or Non-Statutory Committees, the Statutory Executive Board, as well as trainees.

Third parties: This includes companies and individuals who are clients, direct or indirect suppliers of goods and services, business partners, intermediaries, proxies, subcontractors, or outsourced workers.

LETTER FROM THE CEO

Hello team,

In an ever more dynamic and challenging corporate environment, it is crucial that we continue to stand out not only for our excellence in driving people and businesses to reach their full potential, but also for the integrity and principles that steer our actions.

This Code of Conduct, which is also signed by Cosan's subsidiaries Compass, Comgás, Moove and Rumo, introduces a series of guidelines and rules that guide how each employee interacts with clients, shareholders, suppliers and business partners, ensuring a transparent, fair and sustainable organizational environment. This is how we operate, enabling us to leave a positive impact on everything we do.

After all, our values are the foundation on which we build our reputation, and these behaviors sustain our entrepreneurial culture, which is present in all our activities and relationships. Therefore, it is crucial for everyone to be familiar with the principles of this code and to embody them fully.

I thank you all for your continued commitment and dedication to following these core principles. Together, we will continue to create value for our investors, employees and society.

Marcelo Martins

CEO Cosan



HELLO

Ethical and responsible actions, coupled with the efficient and integral issue resolution, are part of Rumo's DNA. We conduct our business and generate value by always orienting our attitudes towards ensuring Rumo's sustainability and actively contributing to a more just society.

Rumo's progress is driven by an unwavering commitment to build and maintain honest, healthy, and transparent relationships with employees, customers, shareholders, partners, and the community. Our solid values should guide all our actions.

Our Code of Conduct embodies Rumo's commitment to achieving its goals ethically. This code is founded on pillars such as respect, honesty, transparency, and integrity, with a focus on social and environmental responsibility and compliance with all applicable laws. These ethical standards also govern our interactions with suppliers, business partners, employees, government, and the broader community.

We believe that diversity is essential to reinforce our values. We promote awareness about the importance of respect as the foundation of our company, aiming to build an increasingly safe and inclusive environment.



WE BELIEVE THAT DIVERSITY IS ESSENTIAL TO REINFORCING OUR VALUES.



Pedro Palma
CEO of Rumo

I invite everyone to read and practice our Code of Conduct, using it as a valuable tool and guide for daily actions.

And remember: Brazil in motion.

SUSTAINABILITY

**THE RIGHT WAY
TO DO BUSINESS:
WORKING FOR
THE SUSTAINABLE
DEVELOPMENT OF BRAZIL**

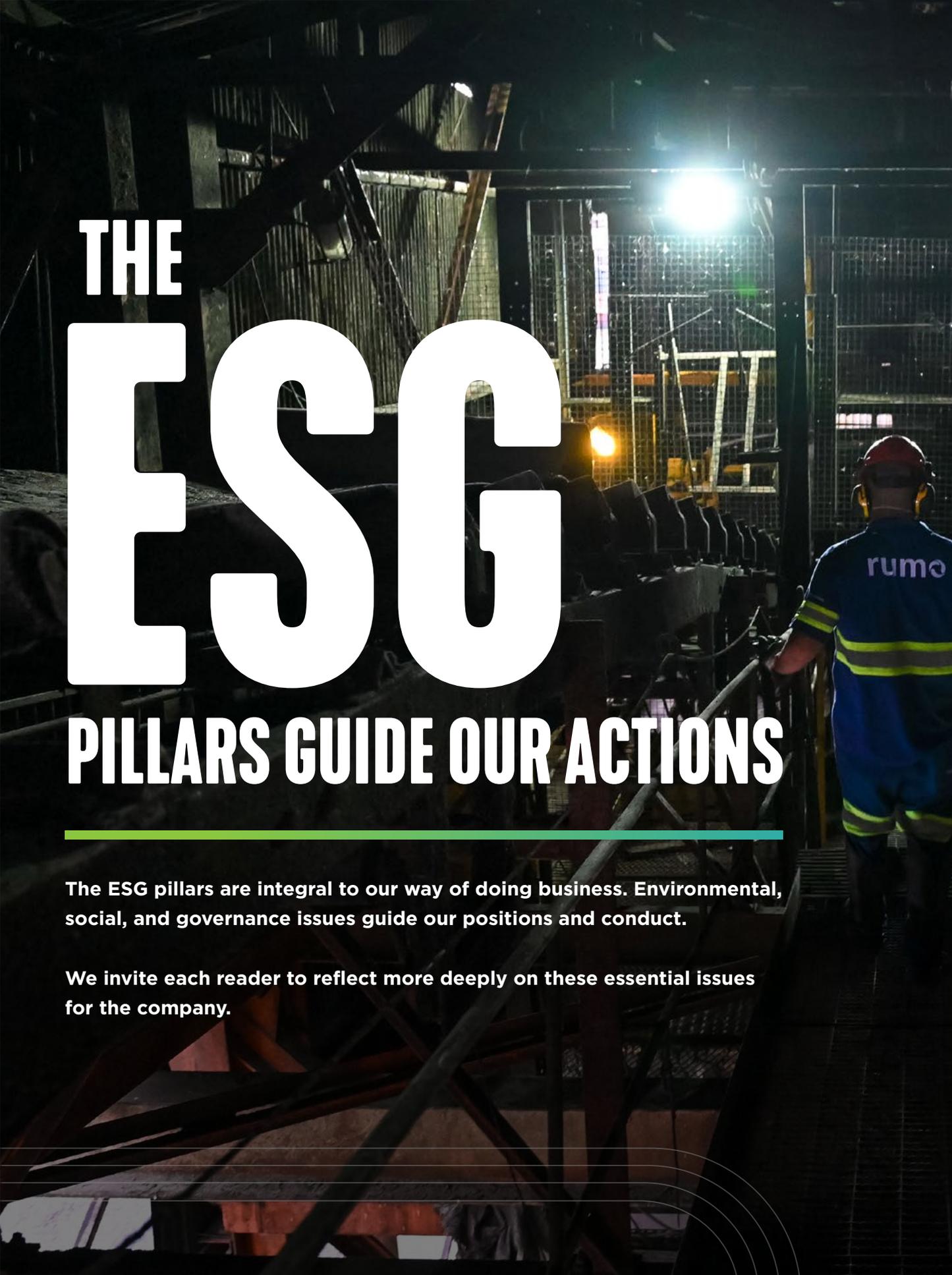


We are Rumo, a company committed to Brazil's sustainable development. We are continually investing in unique assets, operating in sectors where Brazil has a clear competitive and comparative advantage.

The right way requires respect for the people in the company and the community. We are also committed to promote ethical values throughout our value chain.

Even in challenging times, we embrace the diversity of people and perspectives. This drives our business, fosters excellence, and positively impacts the community and our growth.





THE ESG

PILLARS GUIDE OUR ACTIONS

The ESG pillars are integral to our way of doing business. Environmental, social, and governance issues guide our positions and conduct.

We invite each reader to reflect more deeply on these essential issues for the company.

E

Environmental: This involves actions that monitor, prevent, and mitigate environmental damage, such as waste management, the use of renewable energy sources, and our corporate stance on climate change. In all our businesses and the attitudes described in this Code, we prioritize the preservation of the environment and natural resources.

S

Social: Focused on the well-being of Our People and the community, this pillar is guided by aspects related to Diversity, Equity, and Inclusion, respect for human and labor rights, and actions that promote social justice and equity.

G

Governance: Governance is essential for the responsible maintenance of all our processes, ensuring best management practices and integrity in our relationships.

In this Code of Conduct, we present our guidelines, reflecting a management model focused on ethics, transparency, and integrity.

SOCIO- ENVIRONMENTAL RESPONSIBILITY

Our actions are guided by socio-environmental responsibility. This means meeting today's needs while carefully preserving resources for future generation.

We believe that protecting natural resources contributes to the longevity of businesses and creates value for a sustainable future.

Part of this commitment involves recognizing and monitoring our negative socio-environmental impacts throughout the value chain and taking continuous action to mitigate them.

Everyone at Rumo must take responsibility for environmental sustainability and preservation and comprehend our Environmental Sustainability Policies.

[LEARN MORE →](#)

RESPECT FOR PEOPLE

Businesses can only thrive in an environment free of any form of discrimination, prejudice, violence, and moral or sexual harassment.

At Rumo, we value respect for the individuality, dignity, privacy, and freedom of Our People. Our commitment is to remain vigilant in ensuring equal opportunities for all of Our People.

We do not tolerate any form of prejudice or discrimination, including racism, sexism, homophobia, transphobia, ableism, or ageism.



HUMAN RIGHTS

We base all Company activities and relationships on human rights principles.

At Rumo, we follow rules of behavior that apply to all of our People, including mandatory training on the subject.

Our commitment is to respect human rights following best practices and international standards, such as the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the United Nations Global Compact, including respect for freedom of association and recognition of collective bargaining.

We respect the rights of every individual and do not tolerate any form of discrimination based on cultural

differences, origin, physical or mental abilities, ideas, race, color, ethnicity, religion, national origin, sexual orientation, economic class, gender identity, or academic background.

We comply with labor laws throughout our value chain and do not tolerate child labor or any practices analogous to forced labor, human trafficking or any form of modern slavery, including those involving overt surveillance or the possession of workers' personal belongings or documents, either directly or indirectly.

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DIVERSITY, EQUITY & INCLUSION

Working with a focus on these pillars means valuing the plurality within each individual, creating welcoming spaces free from discrimination and offering equal opportunities for all.

This is what we promote in every sector of the Company. We believe this is the key to transforming the future.

To achieve this, we have improved our ability to attract, develop, and care for our talents, promoting people's connection with our purpose and continually reinforcing the importance of diverse teams.

*FOR RUMO, DIVERSITY IS NOT JUST A BUZZWORD IN SPEECHES.
IT SHOULD BE A DAILY PRACTICE.*

COMBATING HARASSMENT OR DISCRIMINATION

We aim to reflect the diversity of our country within our staff. For us, diversity is an asset, integral to our business model, and add value to our team. We believe in providing more opportunities to minority groups as a concrete action against discrimination.

At Rumo, Our People have the right to work in an environment free from any forms of harassment or violence.

Any act of threat or misconduct, whether physical or verbal, is unacceptable. Failure to comply with these rules can lead to severe disciplinary action, including dismissal, the involvement of the police authorities, and criminal prosecution, if necessary.

HEALTH AND SAFETY

At Rumo, we have established prevention and emergency response practices to ensure the safety of our operations and the integrity of our people, recognizing the potential risk of accidents and serious incidents in our business.

We encourage honesty, not omission, when reporting any accidents or situations that pose a risk to individual or collective safety, ensuring prompt improvements are made.

We conduct our activities in compliance with labor and occupational safety laws, thereby providing a healthy and inspiring environment that values the physical, emotional, and psychological well-being of our people.



INDIVIDUALITY

CAREFUL USE OF SOCIAL MEDIA AND PUBLIC COMMUNICATION

Personal use of social media is permitted, provided it respects principles of ethics and freedom of expression. Responsible use must not violate current laws or harm the Company or third parties.

We condemn any abuse or illegal activity on social media, as well as political activism on Rumo's premises or using Rumo's assets. Racism, homophobia, and other attacks on minorities are not personal opinions but crimes subject to punishment.

Our People are prohibited from communicating Company information to authorities, the press, or the government agencies, or from granting interviews on behalf of the Company without prior consent from their leaders and support from the Corporate Communications department.

Be cautious when sending emails. Remember, your words can be taken out of context, and forwarded to others. Ensure your communications are ethical and responsible, clearly differentiating opinions from facts.

ALCOHOL AND DRUGS



Engaging in any activity at Rumo or on behalf of Rumo while under the influence of alcohol or illicit drugs is strictly prohibited, as these substances pose significant risks to health, safety, and productivity.

Carrying drugs or other prohibited substances on company premises is also forbidden. Rumo's Health Department is available to provide assistance with treatment or specialized care. Safety is one of our core values.

Everyone is responsible for ensuring the health, safety, and integrity of Our People, including the correct and appropriate use of personal protective equipment in our operations.

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INTEGRITY AND CORPORATE ETHICS

Policies to ensure

INTEGRITY AND TRANSPARENCY



We are committed to conducting business with integrity through ethical, transparent, honest, and legitimate practices. These policies apply to Our People and are designed to foster a decent and dignified a working environment that respects national legislation and international agreements applicable to each business.

Our policies and procedures are available on our corporate website.

[CLICK TO VIEW →](#)



ANTI-CORRUPTION POLICY

Our anti-corruption guidelines comply with national and international laws and treaties, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

Our People are strictly prohibited from offering any undue advantage, monetary or otherwise, to any Public or Private Agent, or engaging in Influence Peddling to influence decisions affecting Rumo's business.

Rumo implements measures to prevent bribery and continuously monitors its systems to detect, prevent, and respond to such misconduct.

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ANTITRUST POLICY

Our Antitrust Policy is designed to prevent monopolies and actions that hinder free competition, and it applies to all Our People. We are guided by principles of freedom of initiative, free competition, the social function of property, consumer protection, and the repression of

economic power abuse, ensuring a free market economy for collective benefit.

Therefore, under any circumstances, Our People must engage in understanding, agreements, or plans with competitors to manipulate or adjust prices, divide markets or customers, restrict offers, rig bids, or engage in any other actions that pose a risk of anti-competitive conduct.

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DONATIONS AND SPONSORSHIPS

Donations and sponsorships must strictly adhere to our Donations and Sponsorships Policy.

Donations and sponsorships can only be made reputable and upstanding organizations and institutions, and must:

- Promote the Company's name and brand.
- Support projects focused on Rumo's activities and interests.
- Benefit cultural, social, and/or sporting projects.

Conversely, political donations and contributions (whether in kind or through the use of facilities, equipment, goods, or services) made on behalf of Rumo are prohibited. They must not be offered or promised to directly or indirectly influence:

- Business decisions.
-
- Actions, omissions, or decisions by a government agency or agent.
-
- Commercial decisions that are incompatible with current legislation, Rumo’s interests, or internal policies.

GIFTS AND HOSPITALITY

We adhere to best practices when receiving or offering gifts, presents, and hospitality, respecting all of Rumo’s guidelines.

Although, gifts and hospitality may initially seem harmless, they can create a sense of obligation and influence decisions. Therefore, it is crucial to follow our policy on this matter.

The objective is to protect Rumo’s reputation and ensure compliance with the law, the principles of this Code, and our policies.

Any exchange or provision of gifts, premiums, or hospitality must be transparent to avoid real or apparent conflicts of interest and to prevent undue influence on business decisions.

BEST PRACTICES FOR RECEIVING OR OFFERING GIFTS, PRESENTS, AND HOSPITALITY

We recommend avoiding the exchange of gifts and hospitality with public officials, politically exposed persons, or related parties, following our policy guidelines.

Acceptable items include gifts featuring the donor’s brand logo, such as pens, notebooks, calendars, and key rings.

RELATED PARTIES AND CONFLICT OF INTEREST



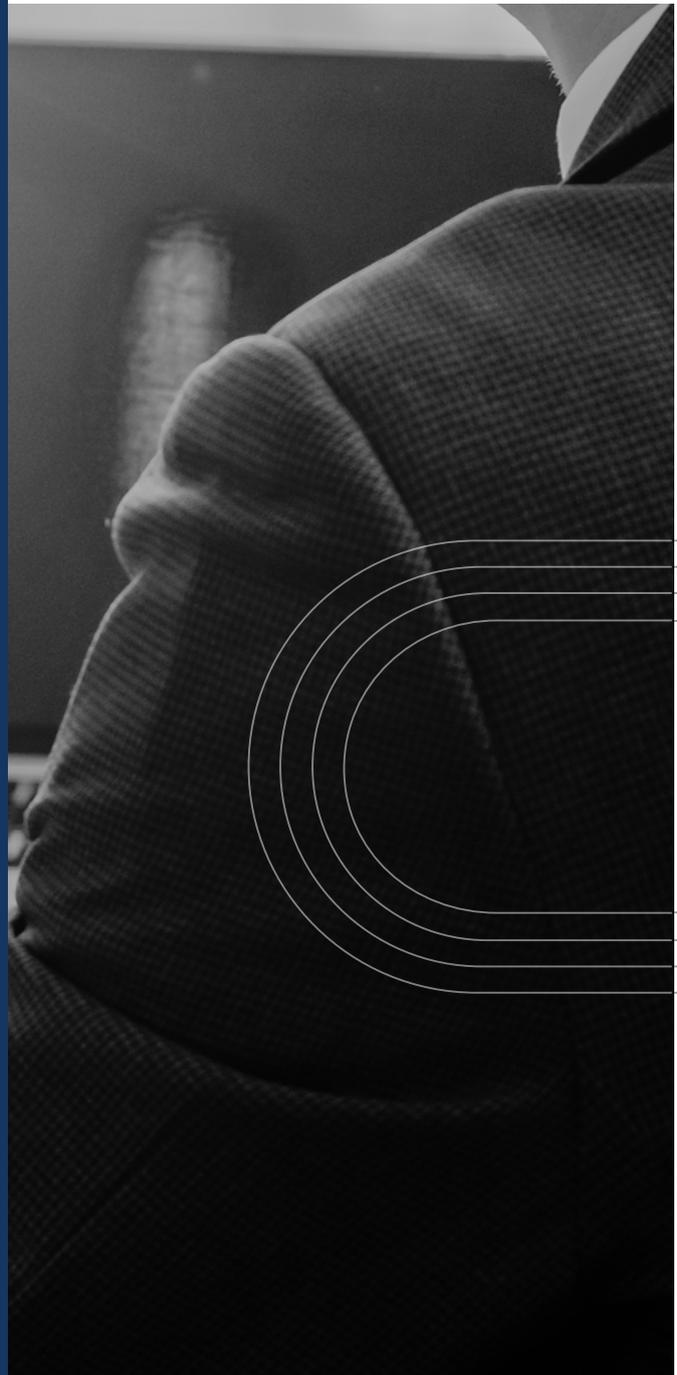
A conflict of interest arise when personal relationships or private financial interests interfere with one's ability to make objective decisions or perform work duties.

When a Collaborator's direct or indirect private interest may conflict with the Company's interests, the Conflict of Interest must be declared.

This is essential for maintaining ethical, transparent, impartial, and strictly professional relationships with Third Parties.

We condemn any attitudes or comments that could harm our reputation and credibility.

All transactions between related parties must be documented and approved by the Committee responsible for each business.



*HAVE YOU WITNESSED
POTENTIAL CONFLICT OF
INTEREST OR SITUATION
THAT CAUSED THIS
IMPRESSION?*

Our People must be familiar with the relevant policies and report the situation to Legal Compliance or their direct leadership.

RELATIONS WITH GOVERNMENT AGENCIES

Our relationships with government agencies, their agents, or related third parties are based on transparency, ethics, and morality.

Any act of corruption or bribery, whether direct or indirect, is unacceptable in these interactions.

Therefore, in accordance with our policies, we do not offer money or any other benefits, directly or through third parties, to any government official to influence decisions, obtain or maintain business, or secure any undue advantage.

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USE AND PROTECTION OF ASSETS

We permit the use of the company's equipment, vehicles, supplies, and electronic resources (including hardware, software, cell phones, smartphones, email,

chat and instant messaging apps, and voice messages) to conduct business and carry out our activities following current guidelines and policies.

The Company's assets are monitored and audited periodically, irrespective of authorization.

It is strictly forbidden to use the Company's electronic resources to disseminate content that may violate our guidelines and the applicable legislation in any way.

DATA PROTECTION AND PRIVACY

Rumo is committed to complying with national and international laws and regulations on privacy and the protection of personal data, including Brazil's General Data Protection Act (LGPD).

We adhere to a policy that implements and guides best practices, ensuring the proper processing of Our People's personal data.

INFORMATION SECURITY

All Our People must to prioritize security when utilizing the Internet in both in-person and remote work.

The Guardian Program provides guidelines to educate and empower Our People to use information security resources safely, responsibly, professionally, ethically, and legally.

[LEARN MORE →](#)

BEST PRACTICE TIPS:

- [Protect accounts and passwords](#)
- [Think before clicking any link](#)
- [Know your network](#)
- [Secure your devices](#)
- [Share data responsibly](#)

ACCOUNTING, TAX, AND FINANCIAL RECORDS

At Rumo, we adhere to national and international norms and standards for accounting, financial controls, and internal and fiscal reporting.

Therefore, the Company's accounting, financial, and tax books, records, and accounts must accurately reflect the

operations and events incurred and comply with the required accounting principles and internal control systems.

The practice of distorting or manipulating, directly or indirectly, accounting, financial, and tax data to hide, disguise, or alter the Company's financial position and results are prohibited and considered illegal. All records must be honest, complete, and accurate.

TO ALWAYS REMEMBER:

EXAMPLES OF PROHIBITED CONDUCT

- Giving, offering, promising, or authorizing undue advantages to public and private agents or third parties related to them, directly or indirectly, through another person or company acting on behalf of Rumo.
- Financing, funding, sponsoring, or in any way subsidizing the commission of illicit acts as provided by law.
- Hindering the investigation or inspection activities of public bodies, entities, or agents, or interfering in their activities de fiscalização do sistema financeiro nacional.
- Receiving or offering any gifts, presents, and hospitality in cash or cash equivalents, such as PIX, gift vouchers, shares, loans, vacation per diem payments, trips, or luxury items.
- Receiving gifts, presents, and hospitality from the same supplier, partner, or third party more than two (2) times within a twelve (12) month period or without the necessary approvals.

REMEMBER: IN CASE OF DOUBT, CONSULT OUR POLICIES, WHICH ARE AVAILABLE ON OUR INSTITUTIONAL WEBSITE

[CLICK TO VIEW →](#)

PROHIBITED CONDUCT: MORE EXAMPLES



- Discriminating against individuals based on their color, gender, sexual orientation, age, physical condition, social status, position, or any other reason.

- Subjecting individuals to conditions analogous to slavery.

- Engaging in moral harassment, whether verbal or non-verbal, including offensive or unwanted comments, embarrassment, and any attack on a person's dignity.

- Engaging in verbal or non-verbal sexual harassment, including but not limited to unwanted physical contact, tickling, squeezing, caressing, rubbing against, hugging, kissing, forced sexual intercourse, or sexual assault.

- Making threats of aggression or practicing psychological and/or physical violence.



HAVE YOU SEEN ANY CONDUCT THAT DOES NOT COMPLY WITH THIS CODE?

COMMUNICATE

All Our People can access the Ethics Channel to report inappropriate, corrupt, or discriminatory conduct, as well as other situations that violate human and labor rights.

Remember: reports are received by an independent company, ensuring the confidentiality of the identity of those who report a violation. Additionally, we do not tolerate retaliation of any kind. **Harassment or punishment of whistleblowers is strictly prohibited.**

ETHICS CHANNEL LINK →



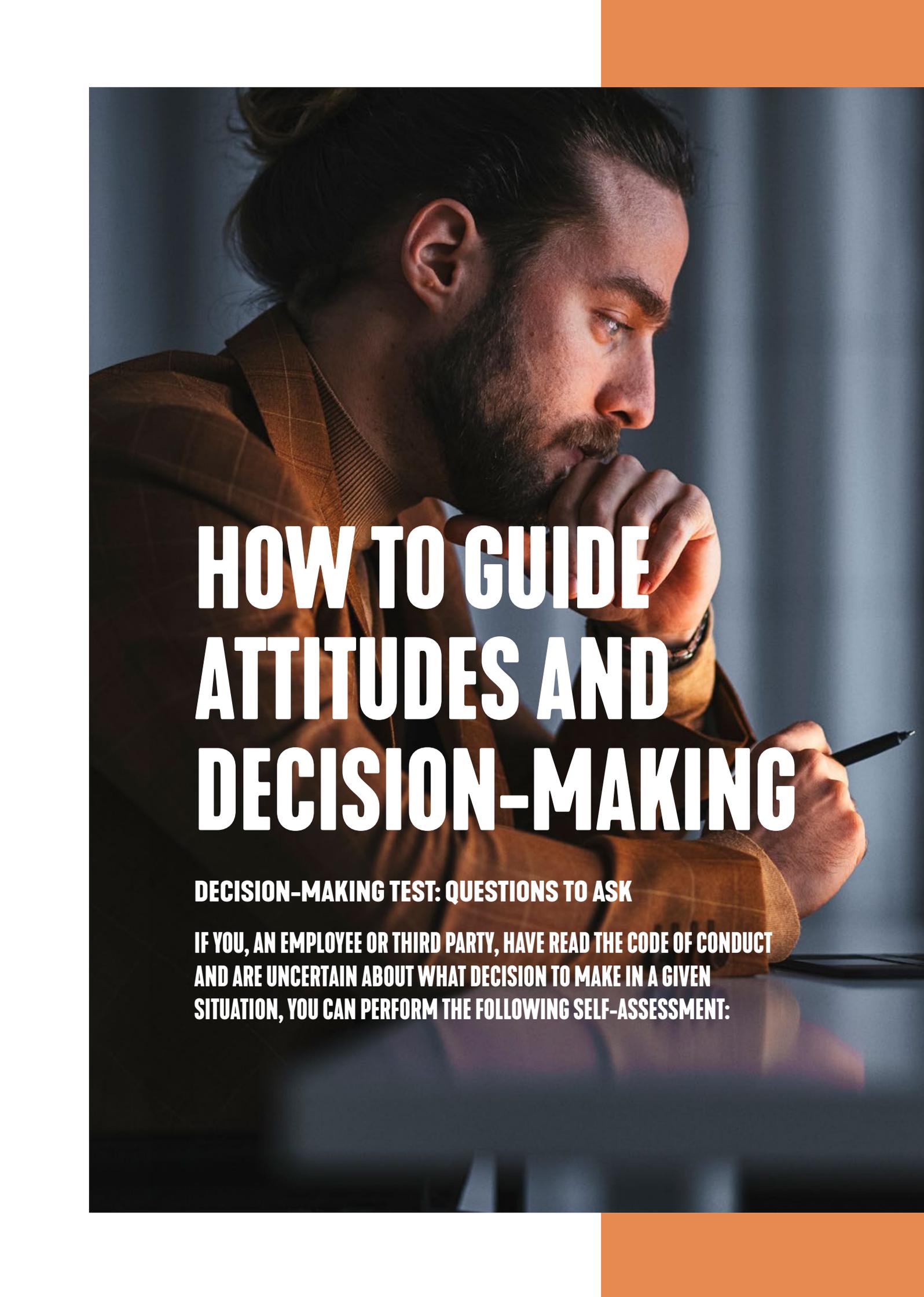
DISCIPLINARY MEASURES

Once a complaint has been investigated, employees will be instructed by their line managers and Legal Compliance to immediately cease any conduct deemed inappropriate or improper.

Please be advised that violations of current legislation, the Values of this Code, the Company's policies, or other regulations may result in disciplinary measures under the terms of the current "Disciplinary Measures Policy."

These measures can include verbal warnings, written warnings, suspension, dismissal without cause, or dismissal with just cause, among others. In

addition to disciplinary measures, any duly ascertained and proven unlawful conduct will be reported to the competent authorities and will be **subject to applicable civil and criminal liability.**



HOW TO GUIDE ATTITUDES AND DECISION-MAKING

DECISION-MAKING TEST: QUESTIONS TO ASK

IF YOU, AN EMPLOYEE OR THIRD PARTY, HAVE READ THE CODE OF CONDUCT AND ARE UNCERTAIN ABOUT WHAT DECISION TO MAKE IN A GIVEN SITUATION, YOU CAN PERFORM THE FOLLOWING SELF-ASSESSMENT:

1
Am I acting within internal guidelines (Code of Conduct, Policies, and Procedures) and legal

2
Would I stand by my decision if it became public?

3
If this doubt were another employee's, would I recommend the same decision in a similar case?

4
What would my family and loved ones think of this decision?

5
Do I accept this decision even if it affects someone else?

If all my questions are answered affirmatively, I can proceed with the decision, as it is probably in line with our principles. Otherwise, if I still have questions, I will contact the channels indicated in this Code of Conduct.

Legal Compliance

Contact:

compliance.juridico@rumolog.com

THE ROLE OF LEADERSHIP

Rumo's leaders have the responsibility to help build **ethical practices and a healthy environment** based on this Code. Their decisions and how they handle concerns, opinions, and bad news are crucial in building trust within the teams.

The role of leadership is vital to the team's success. In our mission to do things the right way, **setting the right example is paramount.**

QUICK HANDBOOK FOR LEADERS ON BUILDING TEAM ETHICS AND INTEGRITY:

- **Talk to your managers** about ethical behavior.
-

- **Emphasize that Rumo expects** all staff to comply with current policies, laws, and regulations.
-

- **Listen to your team** with respect and openness, even in complex situations.
-

- **Do the right thing, set an example,** and show what guides your decisions.

- **Respond respectfully and take Our People's concerns seriously,** even if you disagree. Show commitment to the issue at hand.
-

- **Be an ethical role model** by ensuring that those under your management comply with the guidelines of the Code of Conduct.
-

- **Encourage your team** to complete periodic training on this Code and other policies.
-

- Ensure that staff and third parties associated with your area **have completed the available training.**

AT RUMO, WE ARE ALL RESPONSIBLE FOR COMPLYING WITH THE CODE OF CONDUCT.

If you, as a leader, are unsure how to handle a problem that has come to you or believe it requires a different approach, **consult with Legal Compliance.**

Legal Compliance

Contact: compliance.juridico@rumolog.com

THE ETHICS CHANNELS IS FOR EVERY- ONE

A place to communicate in confidence and
with the assurance of non-retaliation

[ETHICS CHANNEL LINK](#) →

Rumo does not tolerate retaliation against anyone, internal or external, who reports a violation or suspected violation of our policies or the Code of Conduct. We guarantee the confidentiality of the identity of anyone who reports a possible violation.

Retaliation is subject to disciplinary measures, which may include the dismissal of the Employee or termination of a contract, as applicable.

THE ETHICS CHANNEL CAN BE ACCESSED



through the website:

canaldeetica.com.br/cosan/



and by phone:

0800-725-0039.

MANAGING THE CODE OF CONDUCT

This Code is jointly managed by Rumo's Legal Compliance and Internal Controls. It is approved by the Ethics Committee, Rumo's Statutory Audit Committee, and Rumo's Board of Directors.

All Our People have a duty to uphold this Code. We periodically offer training in the areas covered here: integrity, human rights, and diversity.

Additionally, every two years, we conduct a mandatory recertification of this Code of Conduct to reaffirm the main policies.

The Ethics Channel is managed by an external company, ICTS, which ensures the anonymity of the whistleblower and the confidentiality of reports. It can be accessed via the link canaldeetica.com.br/cosan/ and by telephone: 0800-725-0039.

ICTS classifies and forwards the reports to the Company for proper handling. The reports are sent to the responsible area within the Company, which investigates the complaints with support from multidisciplinary teams, such as People & Culture and Legal, implementing corrective or preventive actions to contribute to the development of the Company's Integrity program. The responsible area reports all cases received by the Ethics

Committee on a managerial basis, ensuring anonymity. The Ethics Committee, comprised of the Company's top leadership, adopts strategies, policies, and measures to ensure compliance with internal and external rules applicable to the Company. They also promote a culture of ethics, compliance, controls, and risk mitigation. The Audit Committee and the Legal Department may also investigate complaints received by the Company.



FINAL MESSAGE

We pride ourselves on doing the right thing, even when no one is looking.

Our People are our greatest asset. We have built a solid group that upholds ethical behavior and commitment to the community, regardless of external scrutiny.

READ AND PRACTICE THIS CODE
AS A VALUABLE TOOL WHENEVER
YOU MAY NEED.

Doing the right thing also means collaborating with each other.

Our success, and the success of Our People, directly impacts the quality of what we deliver to stakeholders and communities influenced by Rumo.

WE'RE COUNTING ON YOU!
COUNT ON US!

rumo



*The Code of Conduct will undergo constant review, with a maximum interval of three years, subject to approval by the Board of Directors. The requirements for revision adhere to ISO certification standards and are outlined in the bylaws.