

## 1. OBJECTIVE

Santos Brasil is a company committed to the respect, protection, and dissemination of human rights, fundamental practices to ensure the longevity of the business and its alignment with the sustainable development of society.

It promotes the protection of the rights defined in the Universal Declaration of Human Rights of the United Nations (UN). In this context, the Company establishes its Human Rights Policy, which is based on its Vision, Mission, and Values, and aligned with the Sustainability and Compliance Policies, established in accordance with the principles stipulated by the UN Global Compact, Brazilian legislation, as well as the guidelines and values internationally agreed upon by Brazil.

The goal of this Policy is to establish basic guidelines for the protection and preservation of human rights within Santos Brasil, as well as to contribute to the promotion of these rights throughout its value chain and sphere of influence.

## 2. SCOPE

It applies to all units of Santos Brasil.

## 3. PRINCIPLES

Since 2013, Santos Brasil has been a signatory of the UN Global Compact for sustainable development. In 2009, it also joined the Business Pact against the Sexual Exploitation of Children and Adolescents on Brazilian Highways. Additionally, we engage with public authorities through representative entities in our sector of activity.

The Company understands that the issues related to human rights are a continuous process that requires attention and care regarding the activities and their particularities. It recognizes that the issue demands the involvement of everyone, evaluation of scenarios and specific situations, and effective treatment of deviations, according to their characteristics, impartially and justly. Lastly, it recognizes the importance of dialogue with employees, contractors, third parties, and external stakeholders.

Santos Brasil repudiates involvement or active or passive association in situations characterized by:

- Child labor
- Forced, compulsory, or slave-like labor
- Discrimination, prejudice, and actions or expressions of violence in all its forms
- Moral or sexual harassment

- Sexual abuse and exploitation of children and adolescents

The Company values and commits to promoting:

- Diversity and inclusion
- Free labor union association
- Reduction of inequalities
- The right to collective bargaining

### 3.1 Spheres of Influence

Santos Brasil does not tolerate human rights abuses within its operations and value chain. It acknowledges that its ability to influence policies, procedures, and practices varies depending on the degree of influence it exerts over its stakeholders. Even when its influence is limited, the Company is committed to collaborating with interested parties to ensure effective actions to raise awareness and promote human rights.

### 3.2 Actions

#### 3.2.1 Employees

Santos Brasil provides decent working conditions and invests in the professional and personal growth of its employees. The Company conducts programs and training to promote excellence in its services, ensuring a healthy and safe work environment.

The Company is committed to diversity and inclusion, especially in recruitment and selection processes, compensation, promotion, and access to training. Santos Brasil's Sustainability Committee continuously monitors employees' health and safety, aiming to ensure their physical integrity and healthy, safe working conditions. The topic has been identified as one of the priority issues to guide the Company's actions, studies, programs, indicators, and goals.

To measure the effectiveness of preventive measures, indicators such as the Frequency Rate and Severity Rate of accidents are maintained and tracked. This allows monitoring the operational status and identifying the necessary steps to reduce the number of incidents.

Access the [Code of Conduct](#), [Talking About Best Practices](#) and [Social Media Best Practices](#).

#### 3.2.2 Suppliers and Third Parties

With this group, the Company seeks to build a partnership relationship, sharing its values and strategies, including those related to social and environmental issues. We aim to disseminate respect for human rights throughout our value chain. For this reason, Santos Brasil includes specific clauses in 100% of the contracts for purchasing products and services, aligned with the Global Compact, which address the prohibition of child labor, forced and slave-like labor, and specifications regarding occupational health and safety. To ensure compliance with these requirements, Santos Brasil

contractually establishes the right to conduct audits at the facilities of its business partners, including the adoption of contractual clauses and legal compliance documentation. Suppliers must also ensure the selection of business partners who operate within labor laws and ethical standards compatible with the premises of the Company's Compliance Policy.

Access the [Code of Conduct for Suppliers and Service Providers](#).

### 3.2.3 Clients

The Company seeks to respect and promote human rights in its relationships with clients, aligning values and ensuring coherence in partnerships throughout its value chain.

### 3.2.4 Society

Santos Brasil develops a range of actions to strengthen its relationship with communities around its operations, which also addresses one of its management's priority issues for Sustainability: human development. The Company's operational units have direct and indirect impacts on the economic development of the locations where they are installed. For this reason, it monitors risks and opportunities, directing resources with this focus. Santos Brasil promotes its commitment to human rights, with special attention to promoting the rights of children and adolescents and social inclusion through sports, culture, and education, guided by its [Donations and Sponsorship Policy](#).

### 3.2.5 Public Authorities

Santos Brasil complies with the legislation and regulations of the locations where it operates and cooperates with authorities to respect and promote internationally recognized human rights. It also cooperates with the investigation of any incidents involving violations of these rights throughout its supply chain.

### 3.2.6 Media

Santos Brasil seeks to ensure a transparent relationship with this group, contributing to the consolidation of democracy by encouraging freedom of expression and access to information, which are prerogatives of the Brazilian press.

### 3.2.7 Labor Unions

Regarding employees' right to free labor union association and the right to collective bargaining, Santos Brasil is open to dialogue and ensures the labor rights of its workforce, respecting agreements and collective negotiations with legitimately representative labor organizations and considering the possibility of new agreements to facilitate mutual understanding whenever necessary.

## 3.3 Action

On the themes related to eradicating child labor and forced, compulsory, or slave-like labor, combating discrimination and prejudice, valuing diversity and inclusion, preventing moral and sexual harassment, respecting free labor union association, and the right to collective bargaining, Santos Brasil has:

- Guidelines for the Company's management on the mentioned topics (e.g., Human Rights Policy)
- Prevention of direct and indirect involvement in situations that contradict human rights themes (e.g., training and interactions with employees)
- Guidelines for managing the supply chain (e.g., contract clauses and supplier selection evaluation)
- Internal and external communication campaigns that promote the commitments and topics mentioned in the Human Rights Policy
- Actions to promote this commitment in its value chain (e.g., training, supplier verification, sustainability reporting, and others)

## 3.4 Reporting Irregularities

Reports of irregularities related to this Policy's guidelines, perceived in the Company's business and its subsidiaries, should be immediately reported through the Confidential Portal, available to all its relationship groups.

The Confidential Portal is available on the Company's website 24 hours a day for receiving and handling complaints about employees, contractors, representatives, and others who, in any capacity, perform activities in the interest of Santos Brasil and its subsidiaries, even if without remuneration. Complaints can be submitted in any form, orally or in writing, anonymously or identified.

In any case, the whistleblower cannot suffer intimidation or moral harassment if they are an employee or contractor of the Company, even if the complaint is deemed unfounded. The whistleblower's identity will only be known by the Compliance Committee and must be kept confidential.

## 3.5 Responsibility

Based on this Policy, applicable laws, and other current Company policies, involvement in child labor, forced, compulsory, or slave-like labor, discrimination in all its forms, moral or sexual harassment, and the sexual exploitation of children and adolescents are punishable offenses and will result in sanctions, which may include termination of the employment contract (in the case of administrators or employees) or termination of the service contract (in the case of suppliers), regardless of any communication made by the Company to the competent authorities for civil reparation investigation

and potential criminal complaints.

Every employee, whether own or third-party, administrator, representative, partner, supplier, service provider, or anyone else performing activities on behalf of Santos Brasil must be aware of and comply with this Policy. Lack of knowledge of the rules will not be accepted as a justification in cases of non-compliance with this Policy.

This Policy must be analyzed and understood in conjunction with the Compliance Policy, Personnel Regulation Policy, Code of Conduct, and related policies and procedures.

### 3.6 Dissemination

The Corporate Communications area is responsible for the broad dissemination of this Policy through all available communication channels in all business units of the Company. The People and Management area is responsible for ensuring that all employees are aware of this Policy.

All employees must be trained regarding the Human Rights Policy. Those who undergo training must ensure the dissemination of its content to their subordinates, guiding them to adopt the presented best practices and monitoring compliance with the rules defined in this Policy.

## 4. RECORDS

Identification	Storage	Protection	Retrieval	Retention	Disposition
N/A	N/A	N/A	N/A	N/A	N/A