



CODE OF CONDUCT

— **bp**bunge —
bioenergia

Introduction to our Code of Conduct

Welcome to the BP Bunge Bioenergia Code of Conduct.

This Code of Conduct serves as a guide for conducting ourselves correctly and doing the right thing. It provides us with guidelines we all must follow in living by our values.

This Code applies to any and all BP Bunge Bioenergia employees, as well as to the BP Bunge Bioenergia Board of Directors.

We also expect all business partners, hired and working on behalf of BP Bunge Bioenergia, to respect the principles of this Code of Conduct.

Our Code is a guide to help us make the right decisions, yet it does not address all situations. The Code does not provide detailed information on all legal requirements applicable to BP Bunge Bioenergia and does not address all local policies or procedures. Our Code includes references to relevant BP Bunge Requirements (Policies, Procedures and / or Practices). All of these tools are valuable resources to help our employees and other stakeholders remain informed whilst making ethical decisions.

Aim to become familiar with this Code of Conduct. Should you have any questions, do not hesitate to reach out to BP Bunge Bioenergia's Legal Department.



Geovane Consul
CEO



Mario Lindenhayn
Executive President

Mission

We cultivate
sustainable energy
that drives the
world.



Vision
Become the
global reference in
sustainable
energy.



Our Values



Security

- We conduct our operations according to the highest standards of safety;
- We look out for each other (employees, suppliers, partners, and the community);
- We do not prioritize results over security;
- We know and manage our risks;
- Our goal is for all employees and stakeholders to return to their families safely.



Integrity

- We honor and uphold commitments;
- Integrity is at the heart of everything we do;
- We comply with the law, we are ethical and just;
- We do what is right.



Respect

- We respect the world in which we operate (people, opinions, diversity, community, environment, and the public with whom we interact);
- We are open to differences of opinion.



Excellence

- We tirelessly strive to be best at what we do;
- We encourage innovation, entrepreneurship, and continuous improvement;
- We operate with a sense of ownership;
- We support the continuous development of and encourage their growth.



One Team

- We have a common purpose;
- We collaborate with each other;
- We believe that collective success bears more relevance than individual success;

Who should follow our Code

Our Code applies to all employees, managers, directors, and members of the Board of Directors of BP Bunge Bioenergia.

Business partners' behavior can have a direct impact on our reputation. For this reason, we work with partners who share our values and commitment to safety, ethics, and compliance.

We encourage all our stakeholders and their workforces, whether customers, suppliers or business partners, to know, respect and act in accordance with the principles of our Code of Conduct, reserving BP Bunge Bioenergia the right and duty to take appropriate action if violations of our Code of Conduct are committed.

Employee responsibility

- Read and become familiar with the information in our Code.
- Act safely, ethically, and in accordance with the relevant legal provisions and regulations, the policies, procedures, and the company's values.
- Raise questions and concerns should you become aware of possible violations of laws, regulations, our Code, or company policies and procedures.
- Do not report any incidents in bad faith with the intention of causing harm to others.
- Collaborate fully when participating in internal/external investigations or audits.

Additional Responsibilities of Managers

Act as a trustworthy example and support your team members.

- Create a respectful and inclusive environment.
- Encourage them to speak up.
- Listen and respond to questions and concerns raised.
- Never take or allow retaliation against those who report acts of suspected misconduct in good faith.
- Actively ensure that nobody retaliates against those who speak up or cooperate in investigations.
- Help your team members understand our Code's values and expectations, the company's policies and procedures, and the relevant legal provisions.

When should you speak up?

Each of us has a responsibility to speak up if we note situations that pose risk, are unethical, or potentially harmful.

Should you have doubts, require help, or wish to raise a concern, you should contact your line manager, HR, Legal, HSSE, Ethics and Compliance areas, or use the "Ethics Channel".

Phone: 0800 800 9797

Website: contactoeguro.com.br/bpbungebioenergia

App: Safe Contact

Available for download on Android and IOS operating systems

When prompted, enter the company name BP Bunge Bioenergia when prompted

Zero tolerance on retaliation

BP Bunge Bioenergia does not tolerate retaliation. We consider acts of retaliation as matters of serious concern.

Retaliation can happen in various ways, for example: as threats, intimidation, exclusion, humiliation, and reporting issues in malicious or bad faith.

If you think you have been retaliated against, or know someone who has suffered retaliation, get in touch via the available channels mentioned above.

Chapter 1 Health, Safety, and the Environment



We prioritize the health, safety, and the protection of our workforce, as well as the communities and environment in which we operate. BP Bunge Bioenergia does not tolerate any type of violence, including threats, intimidation, or acts of violence. You must put safety first.

- Do not perform jobs for which you are not qualified.
- Immediately report any incident that may jeopardize health and safety to your line manager or any other resource provided by the company, as mentioned above.
- Actively ensure you protect the environment - make it a personal priority.
- Ensure that your performance is not impaired due to sleep deprivation, alcohol consumption, or any kind of drug use - including the use of prescription or over-the-counter medication.
- Expect and encourage all those who provide services to the company to comply with all relevant health, safety, and environmental standards.
- Know the emergency procedures applicable to your workplace.

Chapter 2 Our People



Respect in the workplace is a key tenet of BP Bunge Bioenergia.

- No form of workplace discrimination, intimidation, abuse, or harassment should be encouraged.
- Encourage and listen to people who speak out.
- Treat everyone with respect.
- Ensure everyone is treated equitably and with dignity.
- Respect the privacy of coworkers and protect all personal and confidential information that the company collects for legal and operational purposes, in accordance with applicable data privacy laws.
- Inappropriate comments of a sexual nature or any other sexually offensive behavior will not be tolerated.

Any employees' external activities will be noted should they affect the company's reputation or legitimate business interests. **We only use information of a personal nature when effectively necessary.**

All personal information is confidential. Ask your line manager or the company's Legal department if you have any doubts.

Chapter 3 Business Partners



Our suppliers and partners are essential to our ability to do business and live up to investor expectations. That is why we make careful choices and follow an objective process to select partners.

- Communicate our expectations clearly to our suppliers and business partners, establishing contractual obligations, if applicable.
- Take appropriate action if they do not meet these expectations or obligations.
- Report any evidence that a supplier or business partner is not in compliance with the relevant legal provisions or their contractual obligations.
- You should know and verify the company policies applicable to suppliers and partners who operate in your business. This includes requirements for government contracts and joint ventures.
- Respect free competition.
- Refuse bribery and corruption.
- Act with integrity, respecting all laws applicable to our commercial transactions.
- Ensure that third parties chosen to represent BP Bunge Bioenergia, such as consultants, agents, representatives, transportation agents, other logistical agents, and other partners, know and comply with anti-corruption laws when conducting our business, since the company is responsible for their actions.
- Be proactive and manage conflicts of interest.
- Ensure to follow all laws and rules that regulate our international business activities.

Exchange gifts and entertainment appropriately

We do not accept or offer gifts or entertainment in exchange for any type of business, services, confidential information, or with the intent of improperly influencing a decision.

- In the event of a conflict between company policies and legal requirements regarding gifts and entertainment, follow the most stringent requirements.
- Some gifts and entertainment are never acceptable, as they may be illegal or damage our reputation; for example, anything that can be viewed as a bribe or that is obscene, improper, or inappropriate.
- Obtain legal permission before paying the travel expenses of government officials or agreeing to pay per diem travel allowances.

BP Bunge Bioenergia complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. This means that we cannot initiate transactions involving funds generated from criminal activities, such as fraud, terrorism, or the drug trade.

In the event that you find suspicious transactions, you have a duty to report the problem and contact the BP Bunge Bioenergia Legal Department so that the company can adopt the appropriate measures.

Be proactive and manage conflicts of interest.

A conflict of interest can occur when your interests or activities affect your ability to make objective decisions for BP Bunge Bioenergia.

Be aware of different situations in which conflicts of interest may occur. For example:

- External employment and affiliations with competitors, customers, or suppliers.
- Working with close relatives, especially if they hold government positions.
- Having an intimate relationship with another employee who has the power to influence decisions such as salary, performance rating, or qualification for a promotion.
- Acting as a Board member of an external organization.
- Making investments, including on behalf of close relatives, that may influence or appear to influence your judgment.

Disclose situations that may generate conflict (even if potentially) to your line manager, in accordance with the respective BP Bunge Policy on Conflicts of Interest.

Avoiding Anti-Competitive Behavior

Competition and antitrust laws are complex and often very specific. For this reason, if in doubt, consult the BP Bunge Bioenergia Legal Department.

Do not engage in the following activities: establishing any type of agreement or understanding with competitors to fix prices, collude in bids, allocate customers, and/or restrict offers.

Chapter 4

Governments and community engagement



We do not accept or offer gifts or entertainment in exchange for any type of business, services, confidential information, or with the intention of improperly influencing a decision.

Sustainability

BP Bunge Bioenergia conducts its business in a way that promotes economic, social, and environmental value. We are committed to promoting local community development where we operate. Each of us has a responsibility to be aware of the company's social responsibility policies and local environmental legislation.

Refuse outright corruption and bribery

BP Bunge Bioenergia does not tolerate corruption and bribery in its business, in any form. The Company complies with anti-bribery and anti-corruption laws and regulations.

- Do not offer or accept bribes or any other improper payments, including facilitation payments.
- Report any act of this nature.
- Keep accurate books and records so that payments can be described honestly and that company funds are not used for illicit purposes.
- Know who you do business with by following due diligence procedures applicable to business partners.

Chapter 5

Notices to the public and protection of our reputation

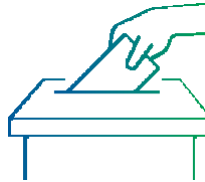


It is essential that our public communication is clear, accurate, consistent, and responsible.

- Remember that your posts and comments on social media are not anonymous and even if they do not represent the principles or ideas of the company, they will be attributed to a professional who works there and can have a negative impact on the company's reputation.
- Only authorized persons are permitted to speak to the press or the investment community. Please contact BP Bunge Bioenergia's management to obtain the necessary guidance.
- External presentations can be an excellent way to share our expertise with others; however, make sure you have the necessary permissions before accepting an invitation and obtain the necessary approval for the content.
- The company's strategic, confidential and intellectual property information must not be disclosed by its employees, under penalty of disciplinary and legal sanctions.

Chapter 6

Our policy on political activity



In accordance with current legal provisions, BP Bunge exercises the right and responsibility to comment on relevant issues.

As an individual, you have the right to personally participate in political processes, as well as engage directly in politics.

However, it is necessary that you make it clear that your personal opinions and actions do not reflect those of the company.

- Do not use company funds or resources to support any political candidate or party.
- Obtain prior authorization when engaging in any lobbying activities.
- Personal and political activities can generate conflicts of interest with the company. Talk to your line manager or consult the company's Legal Department.

Chapter 7 Protection of assets and financial integrity



Honest and accurate accounting practices

BP Bunge Bioenergia trusts its employees to keep books and records accurate and complete. These documents are the basis of our public disclosures and reports. They must provide an accurate view of our company's operations and financial performance.

We all must ensure that the information reflected in the company's records is complete, accurate, and comprehensive. We cannot falsify or alter the nature of any transaction.

We are also strictly prohibited from conducting any transactions that are not recorded in our books and records.

Disclosure of financial information and fraud

All of us must comply with all legal and regulatory requirements that govern reporting, as well as follow the company's internal controls.

Inaccurate, incomplete, or inappropriate records or reports may result in legal liability for the individuals involved, as well as disciplinary action, including termination of employment.

All employees are required to report any suspicious accounting or auditing irregularities as soon as possible.

We must never compromise our core value of integrity by committing fraud. Fraud is committed when an employee misuses company resources, hides, alters, falsifies or omits information for their own benefit or for the benefit of others.

Chapter 8

Audits and investigations



BP Bunge Bioenergia must cooperate with external and internal auditors and investigators, as well as with government inspectors conducting inspections or reviewing the company's products or activities. As employees, we must never attempt to interfere with or unduly influence any inspection or revision.

If you have doubts in the event of an audit or investigation, consult your line manager or the company's Legal Department. In the event of a government investigation, follow local protocols, including contacting the Legal Department as soon as possible.

In case of doubt, contact BP Bunge Bioenergia's Legal Department.

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Our Code of Conduct and its contents may not be repealed without prior authorization. Repeals will only be granted in exceptional circumstances. All repeals must be solicited by the company's Board of Directors. Our Code does not change the terms and conditions of your employment contract. Failure to comply with our Code of Conduct may result in disciplinary action and even termination of employment.

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