



COPEL

Pura Energia

Code of Conduct



INDEX

MESSAGE FROM THE BOARD

03

01 ABOUT COPEL

- 1.1 Introduction to the Code of Conduct
- 1.2 Guiding Principles of Conduct at Copel

05
05

02 TO WHOM THIS CODE APPLIES

- 2.1 Coverage
- 2.2 Audience

07
07

03 GENERAL TOPICS

- 3.1 Compliance with Laws
- 3.2 Accounting Records
- 3.3 Fraud and Corruption
- 3.3.1 Facilitation Payments
- 3.3.2 Money Laundering
- 3.4 Antitrust - Free Competition
- 3.5 Protection of Copel's Image and Reputation
- 3.6 Use of Copel's Assets
- 3.7 Conflict of Interests
- 3.8 Handling of Information
- 3.8.1 Social Medias
- 3.9 Personal Data Protection
- 3.10 Granting or Receiving Advantages, Benefits, Gifts, Hospitality and Presents
- 3.11 Sponsorships
- 3.12 Donations and Contributions
- 3.13 Participation in Biddings/Auctions
- 3.14 Environment, Health and Occupational Safety
- 3.15 Remote Labor (Tele Labor/Work from Home)
- 3.16 Labor Environment and Professional Development
- 3.17 Moral Harassment
- 3.18 Sexual Harassment
- 3.19 Discrimination
- 3.20 Information Security (cyber security)

09
09
10
10
10
11
11
11
12
14
15
15
16
17
17
18
18
19
20
20
21
22
22

04 RELATIONSHIP

- 4.1 Relationship with Suppliers and Partners
- 4.2 Relationship with Government Agents
- 4.3 Relationship with Competitors
- 4.4 Relationship with Society
- 4.5 Relationship with Shareholders
- 4.6 Relationship with Internal Customers
- 4.7 Relationship with External Customers

25
25
26
26
26
27
27

05 RESPONSIBILITIES AND CHANNELS

- 5.1 Violations to the Code of Conduct
- 5.2 Reporting Channel
- 5.3 Anonymity and Non-Retaliation Guarantees
- 5.4 Ethics Committee
- 5.5 CADAM

29
29
30
31
31

06 FINAL AND GENERAL PROVISIONS

33

MESSAGE FROM THE BOARD

In a competitive market environment, it is crucial that organizations, employees, and suppliers take care so that any and all kinds of relationship, either internal or external, take place in a strictly professional environment, ethical and honest, based on the utmost observance of undertaken commitments, preserving the loyalty, and assuring transparency of their actions.

Copel understands that the employees are its main asset, and takes care to have a healthy business culture, grounded on ethical principles and moral integrity. Having as mission the constant search for energy solutions with excellence and business safety, Copel is a benchmark in the Brazilian market, being considered a company holding values such as ethics, transparency, and responsibility.

This Code of Conduct provides the Copel's values, the principles of the United Nations Global Compact and corporate governance, providing a set of conducts related to subjects of integrity, compliance, sustainability, transparency, safety and health, social and environmental responsibility, respect, and relationship with different segments where the Company operates.

Copel believes in its organizational fundamentals and shares them with its employees and suppliers so that they continuously improve their best business practices, always keeping the high standards required by their contractors, regulators, market, and customers.

Those fundamentals, as well as ethical, integrity and conduct principles set forth by law (Law 12.846 dated 08.01.2013 and Law 13.303 dated 06.30.2016), and applied in this Code, shall be strictly observed by employees and suppliers, and incorporated into the daily routine of each one to the benefit of everyone.

It is mandatory to everyone who is part of the Company to read and observe the Code of Conduct of Copel, which is a summary of business culture that should be included into the existing structure, guiding the daily operation of all members for developing activities.

It consolidates the commitment of Copel in observing all legislation applicable to its economic activities and undertakes the commitment to foster support mechanisms so that each employee can be guided and qualified to follow the current standards to perform professional activities related to the Company.

All directors, managers or any other leader have the obligation to ensure the observance of this Code and spread it in order to familiarize all employees and suppliers with its content and support them to understand and observe the guidelines.



Marcel Martins Malczewski
President of the
Board of Directors



Daniel Pimentel Slaviero
CEO



Adriano Rudek de Moura
Chief Financial Officer and
Investors Relationships



Vicente Loiacono Neto
Governance, Risk and
Compliance Officer

01

ABOUT COPEL

Copel – Companhia Paranaense de Energia - is one of the biggest companies in the electric industry in Brazil and operating as open-stock private-public company, controlled by the State of Paraná, currently having shares traded in the stock exchanges of São Paulo, New York, and Madrid.

Created on October 26th, 1954, and headquartered in Curitiba - PR, Copel operates in the electricity generation, transmission, distribution, and trading areas.

Based on its organizational culture and strategic governance reference, Copel adopts as drivers:

Mission

To provide energy and solutions for development with sustainability.

Vision

To be a business reference where it operates, generating value in a sustainable way.

Values

- Ethics
- Respect to people
- Dedication
- Transparency
- Safety and Health
- Responsibility
- Innovation



1.1 INTRODUCTION TO THE CODE OF CONDUCT

The Copel's Code of Conduct, also referred to herein as Code, gathers the guidelines and principles which must be observed and adopted by all people who carry out activities on behalf of Copel, who have responsibilities of being guided by its provisions and observe its content in their operation field, in addition to promote its disclosure, understanding and internalization, guiding the actions and relationships with the internal and external audiences.

This Code is based on ethical principles that guide Copel and define it as solid and dependable company, reflecting its cultural identity and commitments undertaken in the market and with society.

It can be accessed at: www.copel.com/hpcweb/institucional/integridade-copel/codigo-conduto/.

We are all subject to pass on one or more ethical and controversial dilemmas throughout our professional lives. Whenever it occurs, wonder if: "Is the fact or decision according to the law, Copel's policies, values and standards, and my personal values?"

Read this Code and refer to it whenever you have doubts in your routine, both as member of Copel and the society.

1.2 GUIDING PRINCIPLES OF CONDUCT AT COPEL

The Conduct at Copel is driven by six principles:

- **Integrity;**
- **Compliance;**
- **Transparency;**
- **Safety and Health;**
- **Social and Environmental Responsibility;**
- **Respect.**



A photograph of two utility workers. One worker is in a white bucket on a wooden utility pole, wearing a white hard hat, sunglasses, and a grey shirt with yellow reflective stripes. The other worker is on the ground, wearing a white hard hat, safety glasses, and a grey shirt with yellow reflective stripes and a logo on the sleeve. The worker on the ground is holding a long orange pole that supports the bucket. The background shows a clear blue sky, trees, and a white utility truck. An orange vertical bar is on the left side of the image.

02

**TO WHOM
THIS CODE
APPLIES**

2.1 COVERAGE

This Code of Conduct comprises the Copel Holding, wholly owned subsidiaries, associated companies, controlled and jointly controlled companies.

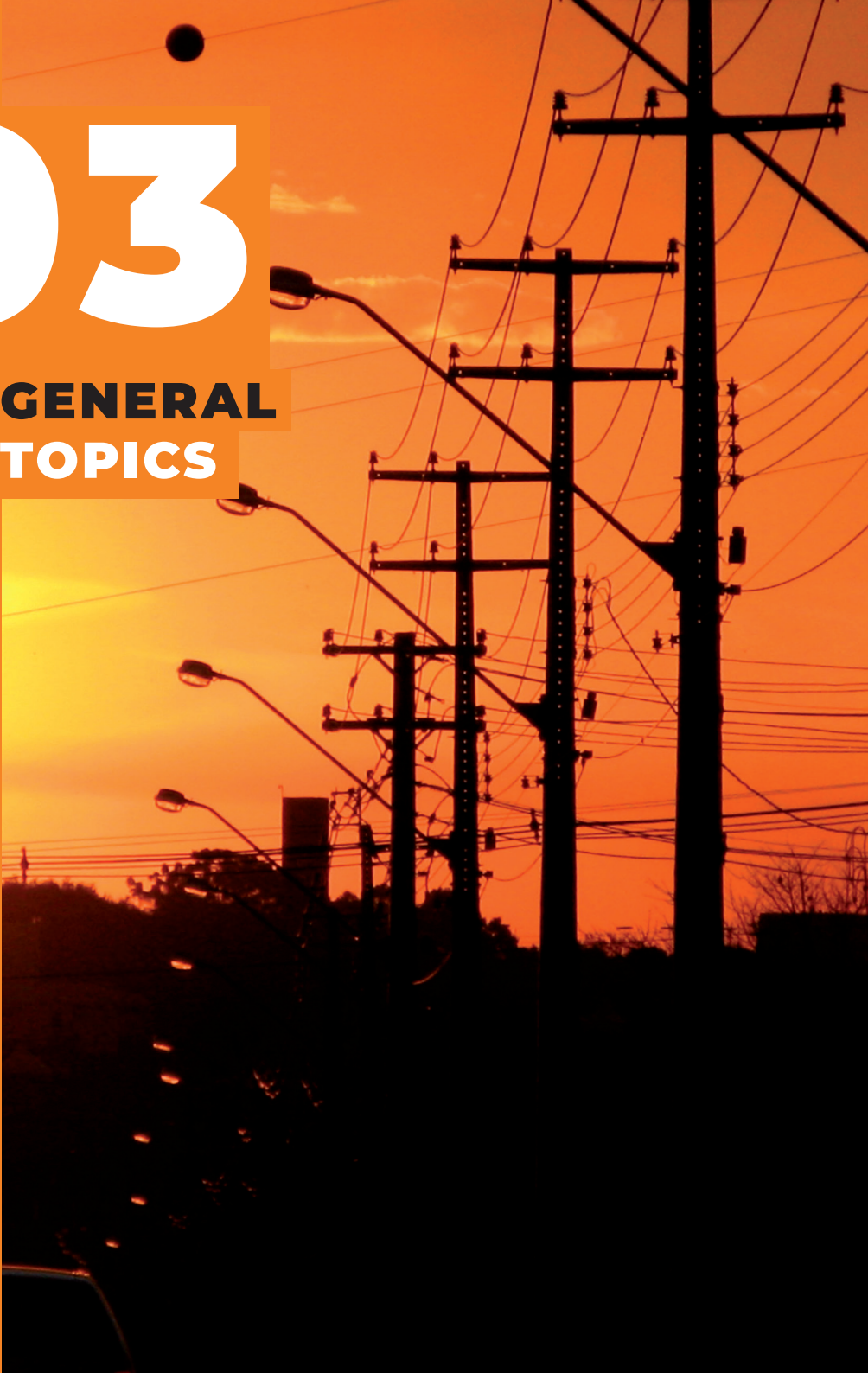
2.2 AUDIENCE

This Code applies to all employees (regardless of their role or hierarchical position), directors (members of Board of Directors and Executive Management), members of Advisory Committee and members of statutory committees, as well as interns, suppliers, contractors, and outsourced service providers, hereinafter referred to as everyone.



03

**GENERAL
TOPICS**



3.1 COMPLIANCE WITH LAWS

Copel values the unconditional and unrestrained respect to the applicable national and foreign laws, including, but not limited to the anti-corruption and antitrust legislations.

3.2 ACCOUNTING RECORDS

Copel assures that its accounting documents and records, internally created or under its responsibility, generated in strict compliance with the current accounting standards, are complete, accurate and clearly reflect each financial transaction made, assuring the required transparency to generate reliable records and reports and that reflect the reality.



3.3 FRAUD AND CORRUPTION

Corruption is an unlawful act and must be fought in every way (small, big, direct, indirect, active, or passive). Fighting corruption in all its ways, including extortion and bribery, is responsibility of everyone in the Company.

Copel considers unacceptable cases of fraud and corruption, in every way, which involve or not, financial amounts, having the public commitment of preventing, identifying, and settling deviations, frauds, irregularities and unlawful acts carried out against the public administration, either domestic or abroad.

Everyone has the duty to report cases of fraud and corruption which, in any way, involve or not financial amounts.

3.3.1 Facilitation Payments

Facilitation payments are payments of any amount used to speed up processes or obtain any advantage in an unlawful way.

Such payments are not official and not part of processes defined by the benefited agency.

Everyone is responsible for avoiding situations of vulnerability in order to reduce the possibility of requesting facilitation payments. If you witness such situations, you should report the occurrence to your immediate manager.

3.3.2 Money Laundering

Pursuant to legal definition (Law 9.613 dated 03.03.1998) Money Laundering is the act of "hiding or disguising the nature, origin, location, provision, transaction or ownership of assets, rights or amounts coming from, directly or indirectly, criminal infringement." In other words, it consists in a number of operations that basically seek to insert unlawful money into the financial system or economy of a country so that it seems to have legal source.

Any payment made by Copel, or on its behalf, must have clear, proven, and traceable source and it must be recorded according to internal regulations.

3.4 ANTITRUST FREE COMPETITION

Copel does not permit any action that may limit or have the possibility of limiting free competition.

Copel vehemently opposes to any type of agreement, either explicit or implicit, between competitors in the same market concerning to prices, production and distribution quotas or territory sharing seeking to jointly increase prices and profits.

Everyone has the duty to be careful regarding to unlawful competition and to not engage on or collude with activities or businesses harmful to consumers, public administration, or society.

The relationship with competitors must exist in a healthy way, never seeking agreements about prices, production capacity, market sharing, sales territories or production programs and attitudes that eliminate competition.

3.5 PROTECTION OF COPEL'S IMAGE AND REPUTATION

The ethical principles of our conduct are crucial to the maintenance of reputation and reliability we have with everyone with whom we relate to.

Everyone should take care of and respect the Copel's image and good reputation.

Whenever you identify a situation that may affect or impact the Company's image and reputation, report it immediately to the responsible area for communication at Copel or its Reporting Channel.

3.6 USE OF COPEL'S ASSETS

Everyone should observe the principles of economy, reasonableness and social-environmental responsibility when using the resources available to carry out activities, such as equipment, vehicles, tools, technological and strategic information, trademarks, operational basis, and other items required for the Company's activities

Computers, cell phones and systems, including e-mail and message applications (such as Microsoft Teams®) are tools that are Copel's property, supplied for exclusive use in matters related to work.

Copel may, whenever it considers necessary, to monitor or inspect the use of its property and working tools.

Copel's property should be used only for corporate activities, avoiding the use with personal purpose.

Every use of the Company's resource, in an undue way or non-compliant with the standards, will be subject to the application of administrative sanctions with full refund of damages caused to the asset.

3.7 CONFLICT OF INTERESTS

The conflict of Interests happens when, due to own interest, someone may influence or act against Copel's principles or interests, making an inappropriate decision or disregarding any of his professional responsibilities

Personal interests should not influence professional decisions.

The conflict of interests may arise when (i) personal interests of employees, directors, members of advisory committee and members of statutory committees' conflict or might conflict with the performance of their activities in an unbiased way, to meet the interests of Copel; or (ii) private activities of employees, directors, members of advisory committee and members of statutory committees are in incompatible with their obligations with Copel.

It is not allowed to (i) use the Company's property, information or resources in own benefit or of third parties'; (ii) receive personal or financial benefit in rendering services or work to supplier or competitor; (iii) carry out external professional activity during the working hours at Copel; (iv) carry out external activities, remunerated or not, that may characterize conflict of interests with the Company business; and (v) use business information, so understood as such those generated, obtained or made available in the work at Copel to perform external activities.

Copel does not permit to hire companies and/or professionals, if the decision factor is based only on next-of-kin or affinity with any employee. This rule is equally valid for cases when the relative, collateral or in law has a membership interest in a company that renders services to Copel.

Everyone who eventually have relatives or personal friends working or intending to work in services rendering or supplying materials to Copel must refrain from personally work in the management of such business, avoiding any act that can influence decisions of other employees who are managing the matter.

Everyone has the duty of analyzing their own status in the Company and immediately report any prospective conflict of interests that might exist.

If there is any conflict of Interests or private interest related to processes or activities, the related person is responsible for promptly reporting it to his immediate management or Ethics Committee.

In a meeting or activities where the person is not independent related to the matter under discussion or resolution, this person should promptly report such conflict of interests or private interest, leaving the discussion immediately and take measures to not attend the decision process up to the end of subject.

Reporting a situation of conflict of interests and the abstention should be included in the minutes of meeting.

Any external private professional activity carried out by employee or administrators, members of advisory committee and members of statutory committees where there is interaction with Copel, its suppliers or clients may be considered conflict of interests and not in accordance with this Code of Conduct.

In case of doubt about the existence or not of conflict of interests, you can request clarifications by registering a notification the Reporting Channel.



3.8 HANDLING OF INFORMATION

All information obtained in the working environment, even if not related to your specific area and even if they do not contain explicit warning, should be handled as confidential, as they may include business secrets, commercial, economic, and financial information, strategic or legal data, and so on.

Take care with storage, transport, transmission and disposal of corporate information and documents. The original documents of probatory value should be protected and kept on file according to the terms defined by law.

Disclosing Company information that is not in public domain is not permitted, regardless of existence of formal obligation of confidentiality. The same applies to third parties' information, protected by confidentiality terms defined by the Company.

Employees, managers, members of advisory committee and members of statutory committees who have access to confidential or privileged information should not use such data in their own benefit or third parties' and they should keep confidentiality even after the end of labor agreement.

It is not allowed the use of personal or Company communication tools to record audio and/or image of conversations, meetings, among others, without knowledge and consent from the recorded party, as well as it is prohibited to disclose in any mean audio and/or image records of conversations, meetings and similar carried out without the knowledge and consent from the recorded party.

It is prohibited to employees, directors, members of advisory committee and members of statutory committees manifest themselves in the name of Copel in the press, public institutions, social media, and market in general, without being expressly authorized to do so.



3.8.1 Social Medias

The integrity must keep on guiding the attitudes of everyone, either inside or outside the company. Therefore, proper behavior is important under any circumstance, as individual or employee. What is spoken and done, including what is posted in social networks, can impact both personal and Company reputation.

The employees, directors, members of advisory committee, and members of statutory committees should not spread messages, by any mean, which have illegal, abusive, insulting, pornographic, racist, sexist, and prejudiced content.

As it is known by everyone, it is prohibited the manifestation on behalf of Copel in social media, except in expressly authorized cases.

The employees, directors, members of advisory committee and members of statutory committees should segregate information of professional and personal type, respecting the intangible assets of Company. Therefore, they must make sure that all their online activities, including the use of social medias, even whether for personal purposes, are appropriate and does not affect the Company in a negatively way.

3.9 PERSONAL DATA PROTECTION

Copel has as principle to manage personal data with diligence, care, and professionalism, complying with all applicable legal requirements, especially those related to General Personal Data Protection Law - LGPD (Law 13.709/2018) and Privacy Policy and Personal Data Protection.

The company strictly keeps confidentiality protection of occupational records related to employees, directors, members of advisory committee and members of statutory committees to those who are responsible to deal with it, while exercising their role, except if the professional authorizes the disclosure or when required by law, regulation, or court decision.

Copel fully respects the right to confidentiality and privacy of personal data of customers and all stakeholders due to their business processes, creating reliable and long-term relationships.

Whenever required, specific contractual clauses will be included for personal data processing and appropriate diligences in order to ensure the same safety level provided by Copel to its contractors.

3.10 GRANTING OR RECEIVING ADVANTAGES, BENEFITS, GIFTS, HOSPITALITY AND PRESENTS

Copel does not accept granting or receipt of undue advantages of any kind, directly or indirectly, to any person or organization. In this regard, it is expressly prohibited to accept from third parties or offer to them, directly or indirectly, advantages, benefits, gifts, hospitality and presents of personal character that may influence decisions, facilitate business, or benefit third parties and/or the Company itself.

Gifts or institutional courtesies of symbolic value may be accepted when they do not exceed 10% of the national minimum wage.

Presents, gifts or free offers beyond such amount, if it is not possible to refuse or return them, should be forwarded to the Compliance Department - DCOM, so that it is given to them the due treatment.

Under no circumstance it will be permitted to accept gifts or courtesies connected to gambling or unlawful games in general.

Invitations for events, training sessions and seminars may not be accepted when paid by customers, suppliers, government agencies and other audiences of stakeholders in general should not be accepted, except when:

- It also includes other companies and upon authorization by immediate manager;
- The invitation addressed to the company, not to a certain person;
- The invitation does not include spouses and/or relatives as prospective guests;
- There is no procedure of hiring or contractual renewal where it is participating the renderer of services/supplier and the areas of company that will be benefited by the invitation;
- The event is of technical, management and/or governance nature;
- There is no situation that results in conflict of interests; and
- Other expenses related to transport, hospitality and food not paid by the host, but by Copel.

No offer or receipt of benefits or gifts may generate negative perception nor impact the Company image or of its employees.

If there is suspicion that the offer of a benefit, gift or hospitality may be decisive to obtain business, favor, grant or unfairly favoring the Company, such offer should not be accepted under any circumstance.

The Compliance Department - DCOM should be formally consulted if there are doubts about the permission or not granting or receipt of benefit, gift, or hospitality.

3.11 SPONSORSHIPS

According to policy defined by Copel, a sponsorship is permitted at any moment, only if the reason and purpose are transparent and justifiable.

Sponsorships: Financial support provided by Copel to projects, events, and activities of third parties' initiative, preferably those included in laws that support tax waiver, of cultural nature, social-environmental, sport, educational, technical-scientific, innovation or strategic, upon disclosure counterparts that generate recognition for Copel's operations, and add value to the brand, increase sales and spread its name, promoting, and widening the relationship with stakeholders.

Only sponsorships to initiatives aligned with the principles that guide the Copel's sponsorship policy may be granted.

No benefit may be offered to obtain any undue advantage and every sponsorship should be granted according to the standards and current laws, including those related to tax and accounting records.

3.12 DONATIONS AND CONTRIBUTIONS

Any donation or contribution, from the Company on its behalf, should only be allowed when its reason and purpose are transparent and justifiable, according to the policy that deals with donations and voluntary contributions.

Donation: Any contribution (financial or otherwise) to a third party, when there is no benefit in return (counterpart).

They are allowed exclusively for social interest purposes and use, after assessing the opportunity and socio-economic convenience related to the choice of another disposal method.

All donation and voluntary contribution should follow a formal process and minimum governance, and depending on the amount involved, will be the responsibility of the Executive Board and Board of Directors, in accordance with the provisions in the Company's Bylaws and policy details concerning to this matter.

No benefit may be granted in order to obtain any undue advantage.

The current legislation and policy that deals with donations and voluntary contributions should be fully complied with, especially when related to tax legislation and accounting records.

3.13 PARTICIPATION IN BIDDINGS/AUCTIONS

Copel conducts its business with Public Administration always in a transparent, ethical, and honest manner, observing and complying with every relevant legislation.

Any practice that harms the Public Administration should, mandatorily, be rejected, and reported to the proper reporting channels provided by the Company.

Any actions that may defeat, defraud, prevent, or manipulate the competitive nature of public bidding procedure are unacceptable.

3.14 ENVIRONMENT, HEALTH AND OCCUPATIONAL SAFETY

The individual rights are legitimate and should be observed. Therefore, Copel provides proper occupational environment to employees, aiming at safety, hygiene, health, and wellbeing.

Copel does not allow child or slave labor in its business, encouraging everyone to adopt practices that contribute to strengthen the human and labor rights in order to eradicate cases of forced and child labor.

Safety and Health are responsibilities shared by everyone in the company. Each person is responsible for creating and keeping a safe labor environment and take care of safety of their colleagues. All employees are encouraged to share their concerns related to safety with their immediate manager, safety areas or Reporting Channel.

Whenever a risk analysis detects that a task is not following the safety steps, it must be postponed or suspended.

Whenever the personal and collective protective equipment are necessary to perform occupational activities, the employees and suppliers should require and effectively use them.

When an employee has any doubts from about the correct use of occupational safety equipment and their need or who should request the replacement of any equipment, he/she should immediately inform their immediate manager or contact the Health and Occupational Safety areas.

It is not allowed to sell, carry, or consume any type of alcoholic beverage in the work

environment or any Company facility, except while holding corporate events out of working hours.

It is not allowed to sell, carry, or consume any type of illegal drugs in the work environment or any Company facility.

The Company is committed to protecting and respecting the environment, to mitigate the negative environmental impacts that may result from its activities, as well as complying with the environmental legislation, prioritizing the prevention of pollution, proper waste disposal and application of ethical and integrity standards in its activities.

Employees should share any doubts or concern about the environmental management related to the Company's activities with their immediate managers, with the Environment areas, or even through the Reporting Channel.

3.15 REMOTE LABOR (TELE LABOR / WORK FROM HOME)

The employees who work from home in a hybrid mode should pay attention to all the Copel's internal regulations when carrying out activities and must observe them as if they were in the facilities at Copel.

They should observe and comply with the policies and internal regulations about the matter, especially the policies of Information Security, Occupational Safety and Health, as well as personal data privacy legislation (LGPD).

Furthermore, the employees who work this way should have a self-manageable profile, valuing the productivity and time management in order to assure the productivity levels agreed with their managers.



3.16 LABOR ENVIRONMENT AND PROFESSIONAL DEVELOPMENT

Copel is committed with the creation and maintenance of respectful, courteous labor environment, which encourages diversity, provide dignity to the employees and favor teamwork.

The concept of meritocracy is strongly encouraged, not being allowed any type of protectionism between leaders and subordinates. The opportunities for professional development and recognition will follow the guidelines defined in internal regulations and will be aligned with the best business practices.

Copel encourages the education of employees, providing specific training sessions whenever necessary and encouraging self-development. The commitment of employees with the development programs offered is essential as well as empowerment and self-management of the career.

Education, respect, transparency, and cordiality should rule the workplace.

3.17 MORAL HARASSMENT

All and any abusive and repetitive behavior, especially manifested by behaviors, words, acts, gestures, and written materials that may cause harm to the personality, dignity or physical or psychological integrity of a person, jeopardizing their employment, or degrading the work environment.

Moral harassment is abusive and reiterated behavior that is against the integrity of a person intended to cause humiliation, coercion or psychologically distressing them or also degrade the working environment.

Abuses of any nature are not tolerated, and any verbal or physical behavior of humiliation, aggression, coercion, or threat to the Company's members, creating a hostile work environment, is unacceptable.

It may not be considered moral harassment behavior (i) to exercise management to define activities, goals and expected results, (ii) to coordinate, follow up and assess activities and results, (iii) to guide and supervise the fulfillment of corporate standards, (iv) to impose job transfers or rearrangements resulting from the Company priorities, (v) to apply disciplinary sanctions, and (vi) to use technological control mechanisms.

Any occurrence of moral harassment should be immediately notified through the Copel's Reporting Channel in order to take the proper measures.

3.18 SEXUAL HARASSMENT

Sexual harassment is a behavior of sexual nature, physically manifested or by words, gestures, or other means, proposed or imposed to a person against his/her will, causing embarrassment and violating his/her sexual freedom.

Harassment usually means any invasive and impertinent approach towards the individual freedom, constant persecution, suggestion, or pretension related to someone which consists in the purpose of inducing behaviors, obtain favors, sexual or not, in a non-consensual manner.

Harassment offends the person's honor, image, dignity, and intimacy. It can take the form of acts, insinuations, forced physical contact, impertinent invitations and that have diverse characteristics, such as, for instance, but not limited to, condition for granting or keeping employment, influencing promotions of the harassed person's carrier, or harming his/her professional performance, humiliating, insulting, blackmailing, or intimidating the victim.

Several behaviors can mean sexual harassment, even without physical contact. They can be explicit or subtle, with physical or verbal contact, such as spoken or written expressions or means such as gestures, images sent by e-mails, comments in social networks, videos, gifts, and so on.

Copel considers sexual harassment unacceptable, repudiates it and assures to take measures about the facts, regardless of role or hierarchical position of the harassing agent.

Any occurrence of sexual harassment must be immediately notified through Copel's Reporting Channel so that the proper measures are taken.



3.19 DISCRIMINATION

No type of discrimination is tolerated in the Company, either in physical or virtual spaces, and there must be unbiased and respectful treatment to everyone.

Copel considers unacceptable the discrimination of anyone due to color, race, ethnicity, gender, gender identity, sexual orientation, disability, disease, appearance, age, social class, political conviction, belief, religion, cult, ideology, regional origin, nationality, civil status, education, hierarchy, position, role, or others.

It is also not allowed to disclose, share, and promote facts, gossips, rumors, and images, either by physical or digital means, which may cause any type of embarrassment, as well as expose any individual in a prejudiced way.

Discrimination occurrences must be immediately notified through Copel's Reporting Channel.

3.20 INFORMATION SECURITY (CYBER SECURITY)

Information Security: A set of guidelines, instruments and actions that assure proper levels of confidentiality, integrity, availability, and information traceability at Copel.

Information: Asset, expressed in print, written on paper, digitally stored, transmitted by mail or electronic means, shown in films or lectures, posted in social networks, social medias or formal or informal meetings that require, due to their importance, to be properly protected, handled, and managed.

Information Base: A set of data kept in storage infrastructures at Copel facilities or external infrastructures that are part of an internally developed application, by its own labor or from third parties' or resulting from acquisition procedure. It has access control mechanisms, and the management has direct access to the main user registered in internal system.

It is necessary to use the Copel's information technology resources in a proper manner, as everyone is responsible for their security.

The users at Copel should follow the existing standards, preserving the provided

resources in an ethical manner and, if it is absolutely necessary to share them with persons outside the Company, it is required to take care with such resources.

Access passwords of information technology systems or resources at Copel are of individual and nontransferable use and the employee is responsible for adopting the best practices for information security and individual protection.

Everyone should be aware on strategies and attempted frauds carried out by cybernetic attacks, therefore, protecting the Company structure and resources.



04

RELATIONSHIP



4.1 RELATIONSHIP WITH SUPPLIERS AND PARTNERS

Copel requires from its providers to operate according to the ethical and integrity principles defined in this Code, observing the current legislation, rejecting any corruption act, respecting the employees' basic rights, and spreading the culture of ethics and integrity in the supply chain.

Every employee must deal with partners and suppliers in a respectful and courteous manner, requiring reciprocal treatment and always act according to the applicable legislation.

Every supplier should, when contracted, receive, and read this Code of Conduct in order to be aware about the guiding principles of conduct at Copel.

All suppliers contracting should be according to the Internal Regulation of Biddings and Agreements.

No supplier may, under any circumstance, carry out activities not in accordance with the agreement signed with Copel.

The regular follow up of agreements with supplies and partners is also mandatory and, if there is any signal of alert, the Compliance Department - DCOM should be notified.

4.2 RELATIONSHIP WITH GOVERNMENT AGENTS

Within the scope of relationship with public entities, the Company's dealings with rulers, public agents, public authorities, regulating agencies, or political parties must be based on transparency and ethics, in order to ensure upright and sustainable relationships.

Copel does not admit any kind of payment or favor to public or private agents aiming at doing business, influencing decisions, or inducing persons to grant undue permits or violate their functional duties to favor Copel or a person it represents.

If there is request for undue advantage by Public Agent, in addition to denying the request, the Compliance Department - DCOM must be immediately notified.

It is unacceptable by Copel any actions that may hinder investigation activities or inspection by internal and external control bodies of public entities or agents, or intervene in their operation, including the scope of regulating agencies and inspection bodies of the national financial system.

4.3 RELATIONSHIP WITH COMPETITORS

It is prohibited to use unlawful or unethical methods to obtain information about competitors, as well as their use or disclosure.

It must not adopt actions that may damage the image of its competitors, as well as their products and services.

4.4 RELATIONSHIP WITH SOCIETY

The relationship with society must be based on respect to principles, traditions and needs of communities where the Company operates, considering the legitimate interests of society.

A dialogue must be maintained with society, aiming to improve the relationship, communicating information of their interest in a timely, clear, and transparent manner.

In order to involve the employees in actions aiming to benefit the company and communities, the Company strongly encourages volunteer actions, offering a fully structured program for this purpose.

In all relationship situations, it is emphasized the importance of always seeking the balance between the interests of shareholders, Company, and society.

4.5 RELATIONSHIP WITH SHAREHOLDERS

The balance between the parties is a crucial factor in the relationship with shareholders.

The interests of both controlling and minority shareholders should be considered in the Company decisions, and under no circumstance should the interests of a shareholder be given preference over the other.

The communication must be accurate, transparent, and timely. The information must allow to follow up the Company activities and assess its performance and potential.

4.6 RELATIONSHIP WITH INTERNAL CUSTOMERS

The Company is committed to promote trust and participation through open and honest dialogue.

Performance assessments should be carried out in a fair and unbiased manner. The subject must be handled with discretion and directed to the individual, thus avoiding the spread of opinions that could damage the image of the person to be assessed.

The Company respects the right and freedom of expression and free association, as long as the Company's resources and name are not used. Free labor union association and right to collective bargaining are also guaranteed.

The participation in political-party activities should occur in strictly personal way and out of labor times and sites, never using the Company's resources and its name.

The synergy between areas, cooperation among employees from all companies in the Copel group and sharing knowledge as a way to learn and disseminate best practices should be valued.

4.7 RELATIONSHIP WITH EXTERNAL CUSTOMERS

Considering customers' needs and expectations when offering products, services and options is essential for a good relationship with external customers.

External customers should be duly guided about the effectiveness and correct, efficient, and safe use of products and services of Company, receiving clear and truthful information.



05

**RESPONSIBILITIES
AND CHANNELS**

5.1 VIOLATIONS TO THE CODE OF CONDUCT

Any infringement to this Code and/or legislation in force is subject to disciplinary measures and/or penalties defined according to the seriousness of occurrence, as defined in internal standard.

After ascertaining the facts, if an infringement of the provisions of this Code is found, the employee, member of advisory committee or member of statutory committee will be subject to penalties provided in the internal rules that deal with functional discipline and the violator's employment contract may be terminated for just cause.

In case of infringement by suppliers, the contract may be terminated based on this Code of Conduct.

After careful analysis of facts and proven responsibility of the involved parties, having disciplinary measures being applied, they must fully reimburse the losses and/or damages caused to the Company's assets.

These penalties do not interfere in addressing ethical-disciplinary, civil, and criminal actions, if applicable, to relevant external bodies

5.2 REPORTING CHANNEL

Reporting Channel at Copel is a safe way to register complaints about fraud, corruption, moral harassment, sexual harassment, discrimination, ethical and conduct deviations, and other irregularities, as well as for consultations related to the Code of Conduct.

The Reporting Channel, managed by external, independent, and specialized company, is available 24 hours a day, seven days a week and contact can be made by telephone or online form, with full guarantee of confidentiality and protection to the complainant. Under no circumstance will the location or telephone number used to make the record be identified.

All complaints are forwarded to a specialized multidisciplinary team with exclusive dedication to managing them, which reports to the Governance, Risk and Compliance Management - DRC, except in exceptional cases, which will be handled according to alternative flows defined by internal regulations.

Cabe a todos comunicar, por meio do Canal de Denúncias, sempre que tomarem Everyone should inform, through the Reporting Channel, whenever they become aware of a possible infringement of this Code, internal rules and/or legislation in force.

It is everyone's obligation to provide an ethical, honest, and safe environment for Copel. In case of doubt, you must contact the Compliance Department - DCOM.

Copel repudiates the practice of empty, conspiratorial, or vengeful denounce.

A good faith complaint will be considered when the complainant presents facts, data or situations that may harm the Company, its employees or other Copel's stakeholders. When it occurs, anonymity and investigation will be guaranteed, following the procedures provided in the Copel's Integrity Program and other related regulations and legislation.

Copel will not accept acts against professionals who, in compliance with their duties, make communications through the relevant channels defined herein.

Reports of infringements may be made through the Reporting Channel:

0800 643 5665

www.copel.com/canaldedenuncias/

5.3 ANONYMITY AND NON-RETALIATION GUARANTEES

Any and all communication will be handled confidentially, except those where there is legal obligation to inform the authorities. Copel ensures protection to the complainant, anonymity, confidentiality, and due response to his or her communication. The Company also ensures the confidentiality of information of all those involved in ethical denunciations, aiming to preserve rights and protect the neutrality of decisions.

Copel does not accept and repudiates retaliations or punishments against professionals or any persons who present, in good faith, criticism, suggestions, denunciations, complaints or information to the superior authority or any other relevant authority. Safety is guaranteed against any and all type of internal retaliation, and the employees who prove to have such behavior are subject to disciplinary actions, including dismissal.

Any person who believes to have been victim of any type of retaliation or has doubts about it should report it to his immediate manager, to the Compliance Department - DCOM or make a complaint through the Reporting Channel.

5.4 ETHICS COMMITTEE

The Ethics Committee is an advisory collegiate body to the Board of Directors, and its main duties are to monitor the process of receiving and investigating reports received through the Reporting Channel, to periodically review and issue guidelines about this Code of Conduct, and also cooperate to review internal policies and regulations related to the matter.

The procedures required for the operation of Copel's Ethics Committee are regulated in the Committee's Internal Rules of Procedure.

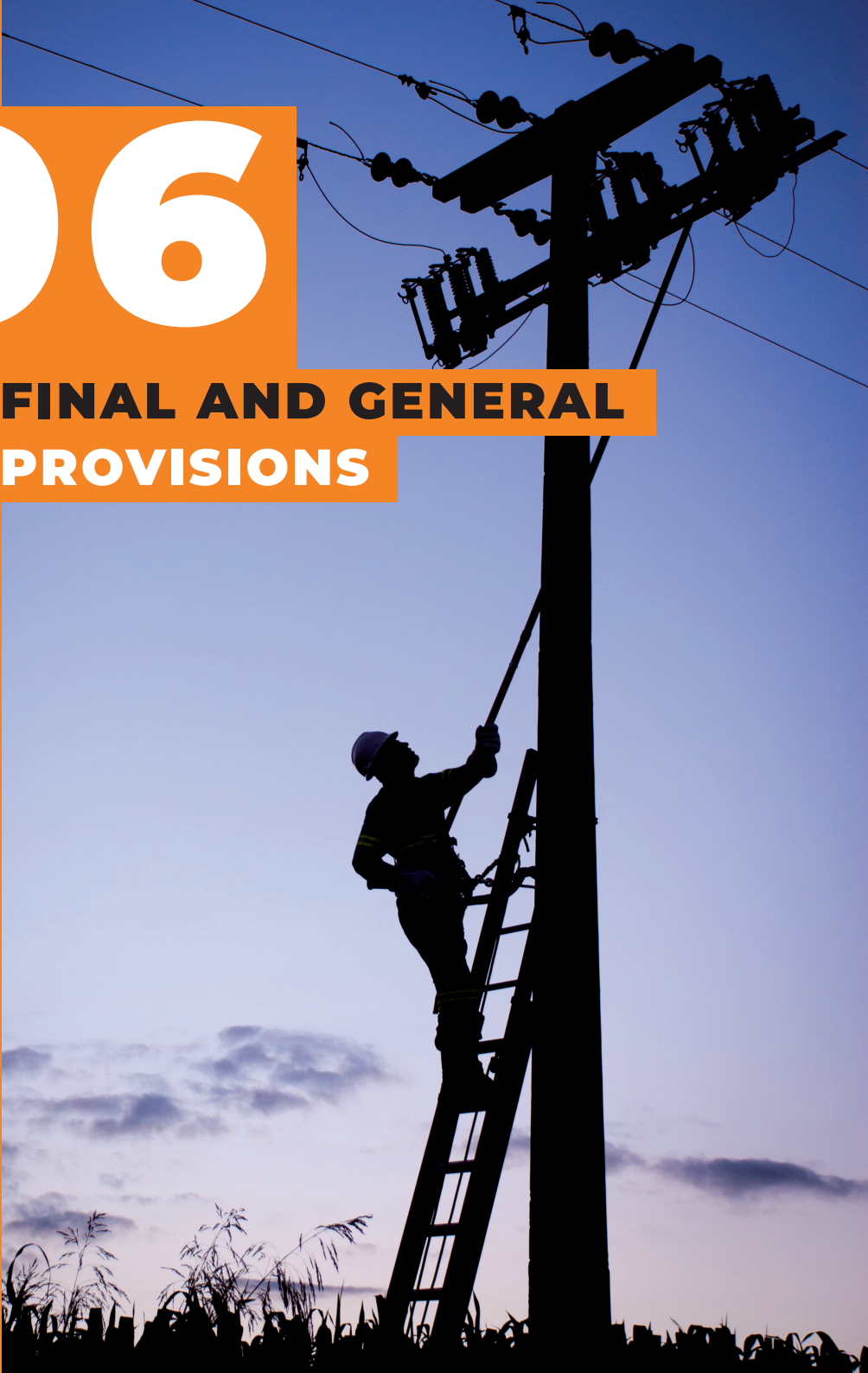
The data related to denunciations and consultations sent to the Company's Ethics Committee will be disclosed on yearly basis on the intranet and Internet. This disclosure consists in the presentation of total number of complaints and consultations, preserving the confidentiality of the involved parties.

5.5 CADAM

The Commission for Analysis of Complaints of Moral Harassment - CADAM has the duty of analyzing the complaints of moral harassment in the Company. As a supplementary attribution, CADAM is responsible for guiding employees about preventing moral harassment according to social responsibility and best practices of corporate governance.

06

FINAL AND GENERAL PROVISIONS



This Code of Conduct has the purpose to be as comprehensive as possible, however, situations not defined in its provisions may arise. In case of occurrences not mentioned in this document, and which may raise doubts related to the proper way to proceed, the matter should be submitted to the immediate management or Compliance Department - DCOM.

Copel shall conduct a yearly training on this Code of Conduct.

This Code will come into effect on the date of its approval and will be effective for an indefinite term.

No unawareness of the guidelines included in this Code may be claimed, under no circumstance or any argument.

Everyone who work in the name of Copel are required to observe the rules and procedures designed to ensure the compliance with applicable domestic and foreign laws, especially the Anti-Corruption Law (Federal Law 12.846/2013 and Decree 8.420/2015 which regulates it) and internal regulations.

The commitment to the Code of Conduct, as well as its reviews, must be formalized by signing a specific Document, even if electronically.

This Code of Conduct must be reviewed in every four years, under the coordination of Ethics Committee and such review may be done less often, at discretion of the Committee.



DOCUMENT OF RECEIPT AND COMMITMENT

I hereby declare on this date that I have received, acknowledged, read, and understood the provisions included in the Copel's Code of Conduct which was delivered to me, in which were incorporated, among others, the provisions of Law 12.846/2013 as well as Decree 8.420/2015.

Therefore, I commit myself to respect and comply, in the performance of my activities, with all terms, conditions and ethical principles included in the Copel's Code of Conduct.

I also state that in case of doubt, suggestions, or awareness of infringements to this Code, I will report it alternatively or cumulatively:

- (i) To the Denounces Channel: Telephone number 0800 643 5665;
- (ii) To the Denounces Channel: www.copel.com/canaldedenuncias;
- (iii) To the immediate superior; or
- (iv) To the responsible for the Compliance Department - DCOM.

Name: _____

CPF [Individual Taxpayer's Registry Number]: _____

Function or Position: _____

Enrollment: _____

Date: ____ / ____ / _____

Signature: _____



COPEL

Pura Energia

