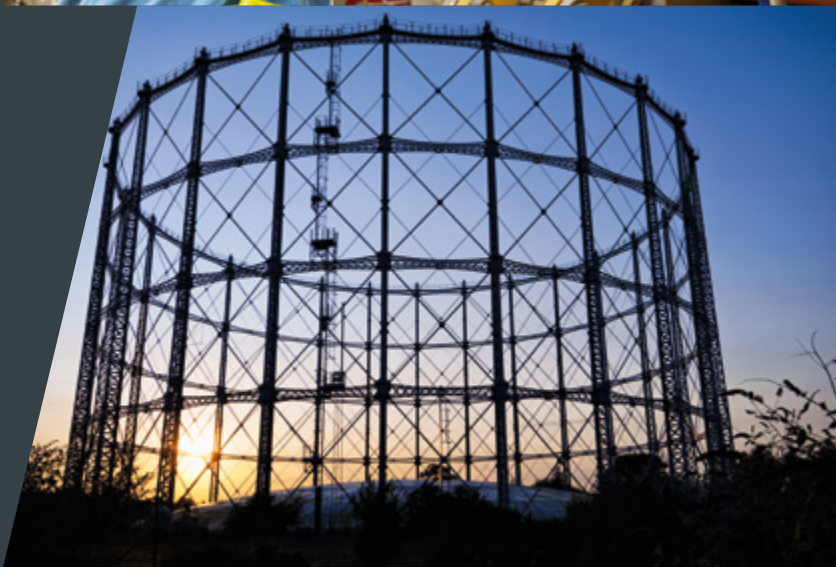


COMPASS

gás & energia



Report of
SUSTAINABILITY
2021

COMPASS

gás & energia

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A message from the CEO

GRI 102-14 | 102-15

2021 was Compass Gás & Energia's second year of life. We continue to invest in our purpose of creating options for an increasingly free gas and energy market in Brazil and we advance the ESG flags and targets assumed in 2020.

We became signatories of the United Nations (UN) Global Compact and improved our commitment to climate change mitigation and transparency, debuting in the Carbon Disclosure Project Climate Change (CDP). In the Brazilian GHG Protocol Program, we had our emissions inventory recognized with the Gold label. Comgás has advanced in the path of reducing its direct Greenhouse Gas emissions, made its first public call for renewable gas supply and made significant progress in the degree of customer satisfaction. We have also expanded the number of people impacted by our initiatives and social partnerships, increased the participation of women in leadership positions and continued to invest in the development of Brazil's infrastructure.

This was also the second year of the Coronavirus pandemic (Covid-19), which affected populations worldwide. In addition to the countless lives claimed, the pandemic has generated several social and economic impacts, such as inflationary pressures and breakdowns in global production chains. And in this context, we reinforce our commitment to the health, safety, and well-being of our employees, customers, partners, and their families.

Even in the midst of the pandemic, we consolidated our culture, named Our North, formalizing the characteristics and behaviors

expected of our employees in the construction of a collaborative, diverse, and high-performance work environment.

We have maintained our focus on the continuity of operations and ensured the supply of natural gas to our more than 2 million customers without interruptions.

Comgás achieved an excellent safety performance, following our relentless search for zero accident, and operational and expansion indicators, such as connecting new customers and expanding the pipeline network. We signed with the Government of the State of São Paulo the extension of the concession contract of Comgás until 2049, assuming the commitment to continue investing to connect dozens of new municipalities and more than 2 million new consumers to the distribution network, efficiency, competitiveness, safety, and customer focus.

Our portfolio also gained an important asset: we became majority shareholders of Sulgás, a distributor of piped gas from Rio Grande do Sul, privatized by the State Government. We also advanced in the process of acquiring Gaspetro, still conditional on procedures and approvals by the competent bodies, a holding company that holds interests in 18 gas distributors in different regions of the country.

After a long and diligent process of planning, licensing and impact mitigation actions, we have also started the works of the São Paulo Regasification Terminal (TRSP), which will give consumers options for access to the world's natural gas supply.

We know that there are still a number of challenges to be overcome in the process of opening up the Brazilian natural gas market. We believe and work for a more competitive and efficient market, and we continue to invest to create alternatives to the Brazilian consumer. We are prepared for this changing environment, with a strong socio-environmental commitment and a management and governance structure aligned with the most recognized market practices.

We remain confident and grateful for the engagement of the entire team of employees, customers, suppliers, and partners in this journey, portrayed in our second Sustainability Report!

A strong hug and good reading,



Nelson Gomes

Chief Executive Officer of
Compass Gás & Energias



About the
Report

2

This second Sustainability Report of ours reflects the achievements and evolutions we obtained in 2021 in our business and in our Environmental, Social and Governance (ESG) Flags and Goals that we have assumed in line with the Organization's Sustainable Development Goals (SDGs) of the United Nations (UN). [GRI 102-50](#)

Prepared in accordance with the Global Reporting Initiative (GRI) Standards - Essential option -, this document also includes indicators from the Sustainability Accounting Standards Board (SASB), IFRS and EM-MD Standards, and is ensured by an independent third party - Ernst & Young - demonstrating our commitment to transparency and corporate responsibility. [GRI 102-54](#) | [102-56](#)

The development of this publication was led by the Sustainability and Investor Relations teams of Compass Gás e Energia, in partnership with several areas of the company, and counted on the engagement and participation of senior management, who reviewed and approved the material. Questions regarding this report are welcome and can be sent by e-mail (ri@compass.com.br). [GRI 102-32](#) | [102-53](#)

Good reading!

Materiality

[GRI 102-21](#) | [102-40](#) | [102-42](#) | [102-43](#) | [102-46](#) | [102-49](#)

The topics covered in this document, with a small internal update of the indicators presented, follow the materiality construction work performed in 2020 and which was the basis for the definition of our **2025 ESG Flags and Goals**.

Compass Gás e Energia's materiality matrix construction process

1

Identification of the context in which we operate, with a study of more than 30 internal and external documents

2

Prioritization of relationship audiences to be consulted, through individual interviews or an online questionnaire, totaling 64 people involved, including representatives of the sector association, employees and senior leadership, customers, federal, state and municipal governments, financial institutions, investors, regulatory bodies, and business partners

3

Analysis, with the definition of material themes

4

Approval of material topics by the Executive Board.

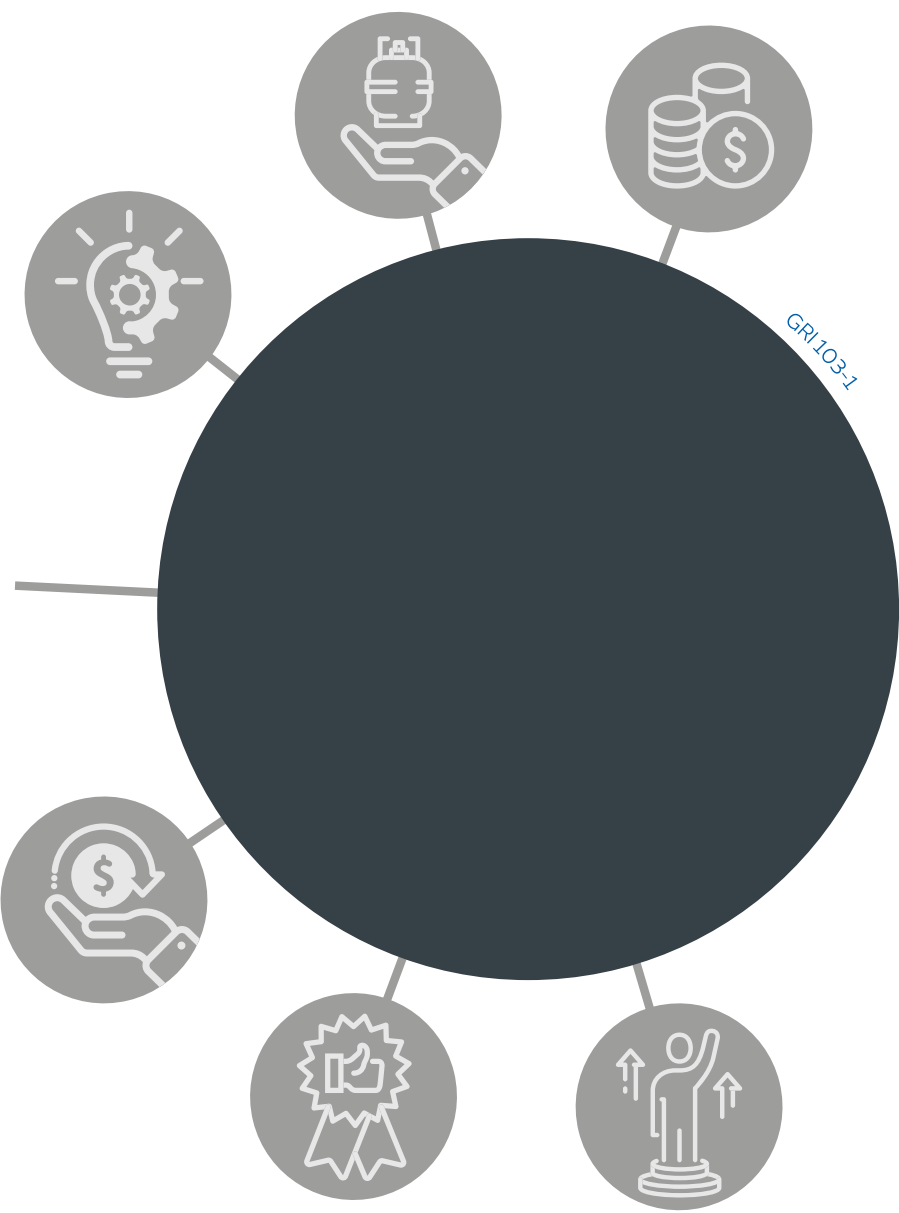
Priority Sustainable Development Goals (SDGs)



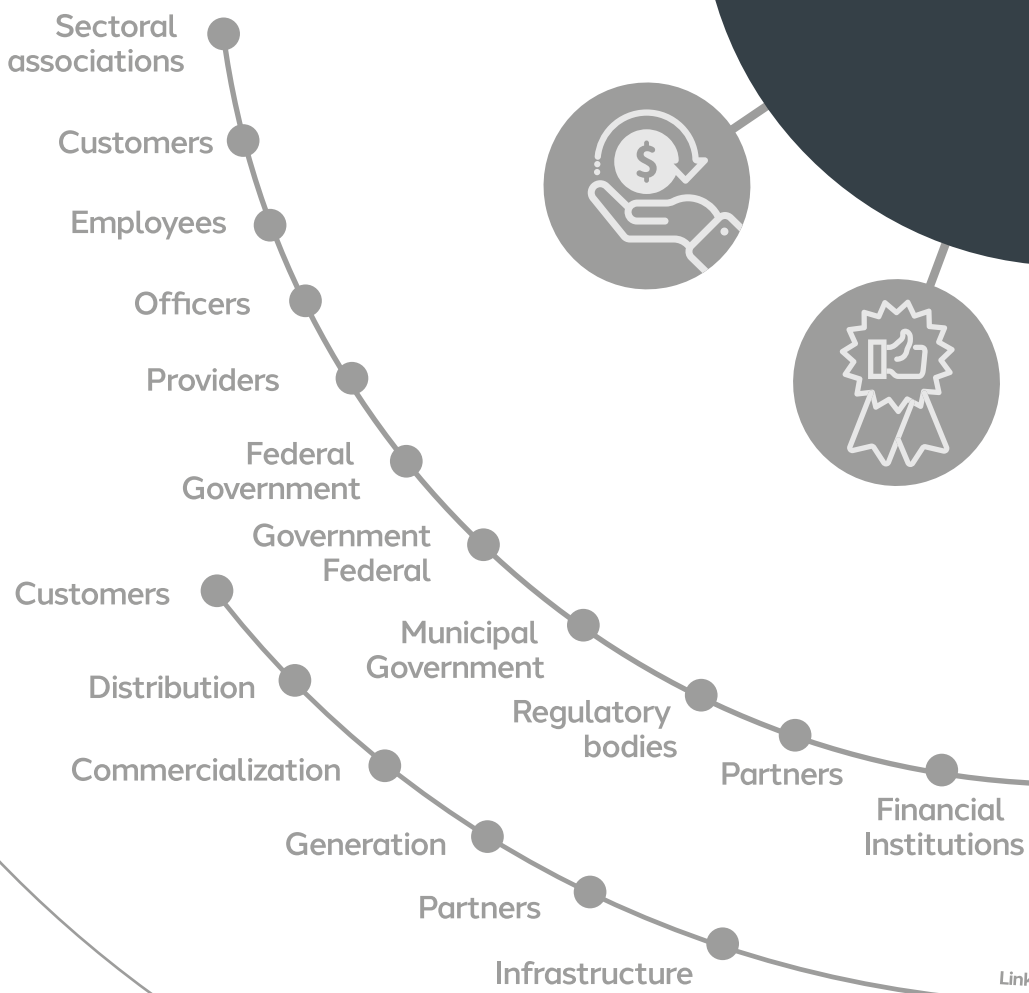
MATERIALITY MATRIX

Relevant topics

GRI 102-44 | 102-47



GRI 103-1



Shareholders for whom the topic is material

GRI 102-40

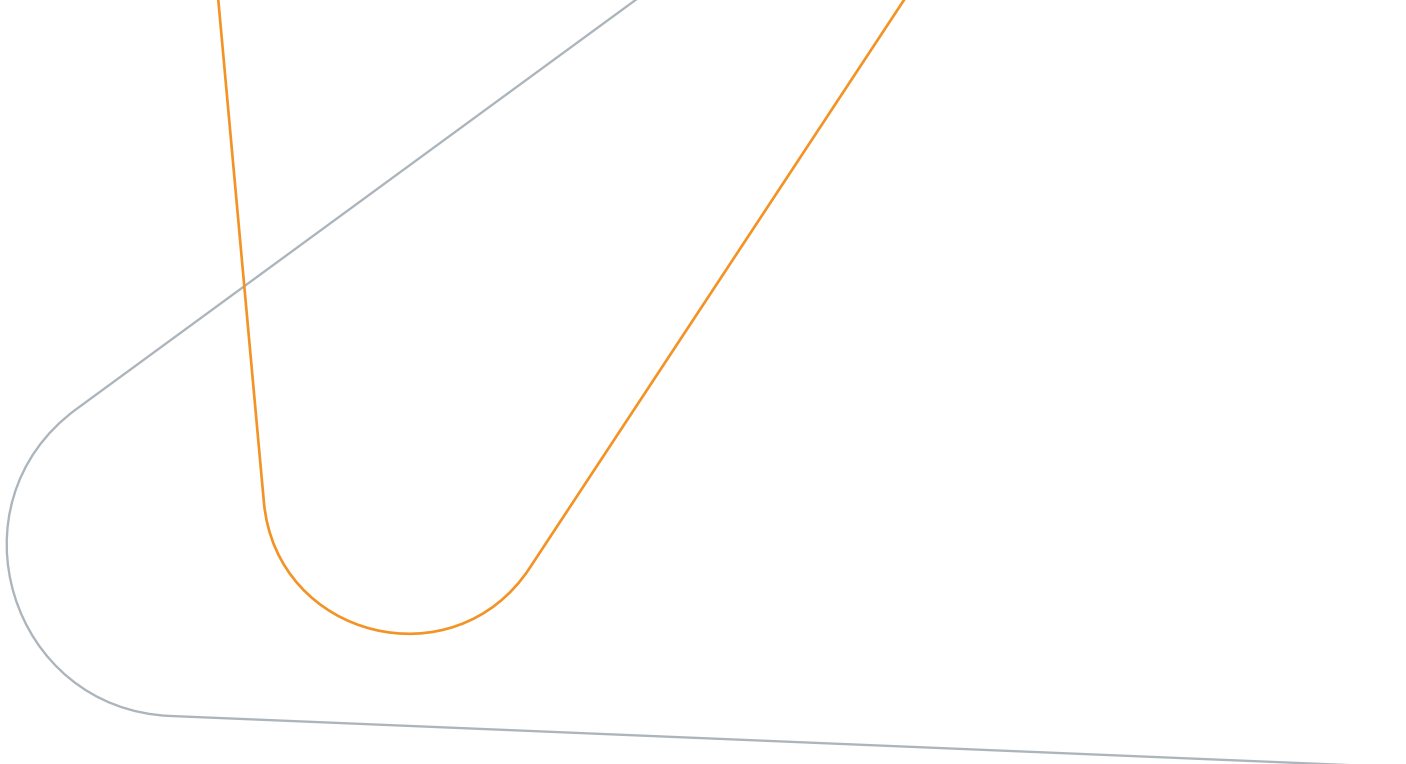
Links in the value chain where the theme is material

GRI 103-1



**Platform of
solutions** in gas
and energy

3



We are Compass Gás & Energia, a company created in 2020 by Cosan and driven by the purpose of creating options for an increasingly free market. Through our businesses, we offer services and solutions focused on customers, with the objective of expanding access to natural gas in a safe, efficient and competitive way, contributing to the security of the energy matrix, economic development, and the expansion of national infrastructure.

GRI 102-1

Our businesses are strategically focused on: GRI 102-2

- **Natural gas distribution**, to promote and expand access to the benefits of piped natural gas. In 2021, our portfolio included Comgás, the largest piped gas company in Brazil in terms of volume distributed. In the year, we also acquired Sulgás, a distributor of piped natural gas in the State of Rio Grande do Sul, which was part of our portfolio as of 2022. GRI 102-10
- **Infrastructure and gas origination**, from future access to competitive domestic gas supply and from the foreign market, with imports of Liquefied Natural Gas (LNG), through Compass Infraestrutura.
- **Gas thermal generation and Gas trading**, in the future, we intend to connect supply and demand to promote flexibility, competitiveness and energy security for our customers and contribute to national energy security, providing stability to the increasingly renewable electricity matrix.

In 2021, for this purpose, we have around 1,200 direct employees and 3,600 indirect employees, fundamental to achieving results such as net revenue of R\$12.3 billion, adjusted Ebitda of R\$2.7 billion and adjusted net income of \$1.7 billion. GRI 102-7

Flags and Goals

ESG

With an eye and commitment to the future, in our first year of life, we have already started a strategic sustainability project, reinforcing our responsibility with the global agenda by defining three Flags that represent the essence of our activities, which are based on the materiality matrix performed in 2020. Corresponding to the United Nations (UN) Sustainable Development Goals (SDGs), the three Flags reflect ESG topics relevant to the business we do, in the view of stakeholders and internal leadership. For each Flag, we have instituted three goals that must be met by 2025. Therefore, the Flags guide our day-to-day actions, always in search of sustainable development with the highest standard of governance. Due to its relevance, we instituted three ESG Working Groups (WGs) in 2021 - one for each Brand - to boost the achievement of the goals.

FLAG 1

VALUE PEOPLE AND SOCIETY, ensuring excellence in customer service, developing people and promoting diversity, relentlessly seeking zero accidents and expanding partnerships and volunteer actions..

Goals:

- **Have 1/3 of leadership positions held by women** – The year 2021 was marked by a great advance in the gender diversity agenda. We reached the milestone of 34% of women in leadership positions. For 2022, with the arrival of Sulgás and any other assets in the portfolio, we will direct efforts to continue strengthening this agenda, with the commitment to always have more than 1/3 of the leadership positions held by women.
- **Double the number of people impacted by our partnerships and volunteer actions** – In the year, with investments in volunteering actions and promoted projects focusing on culture, sports and volunteer activities, we impacted 106% more people compared to 2020, totaling 3,962 people impacted. For 2022, with the entry of new assets in the business portfolio, we will expand our social performance strategy, with the objective of enhancing the positive impacts in the new regions of operation.
- **Get Net Promoter Score (NPS1) 55 at Comgás** – Focusing on customer centricity, we performed several actions to strengthen our relationship with this audience and we reached NPS of 50, an increase of 18 points compared to the year 2020.



1. **Net Promoter Score (NPS)** is a methodology that measures satisfaction and assess the degree of loyalty towards a company or a product.

FLAG 2

OFFER MORE ENERGY WITH LESS EMISSIONS,

by contributing to the reduction of Greenhouse Gas (GHG) emissions by replacing more polluting fuels with natural gas, expanding the presence of natural gas in the transport matrix and including renewable gas in our portfolio.

Goals SASB EM-MD-110a.2.

- **Annually reduce our GHG emissions (Scope 1 and 2) per kilometers of distribution network** – Decrease of 11% compared to 2020.
- **Make Comgás Net Zero GHG emissions (Scopes 1 and 2) by 2025** – Decrease of 6% compared to 2020.
- **Incorporate gas from renewable sources into the supply portfolio** – We have included, in the public call for gas supplies of Comgás, a proposal referring to biomethane projects. In 2022, we intend to enter into the first contract for the incorporation of gas from renewable sources in the supply portfolio of Comgás. Sulgás has a volume contracted to commercialize biomethane in its region of operation.



FLAG 3

DEVELOP THE COUNTRY'S INFRASTRUCTURE,

in order to internalize and universalize natural gas, expand its presence in the electricity matrix, diversify access to the molecule and adopt and promote the best safety practices and value creation for communities.

Goals:

- **Connect 770,000 new customers at Comgás and expand the natural gas distribution network by 5,600 kilometers (considering the base year 2018, according to Comgás Regulatory Plan 2018-2024)** – In 2021, Comgás connected 130,000 new customers, totaling 457,000 customers in the 2018-2024 cycle (60% of the target) and expanded its distribution network by 911 kilometers, totaling 4,467 kilometers (79% of the target).
- **Expand the alternatives for gas supply in Brazil, installing a liquefied natural gas terminal in the country** – In 2021, we started the construction of the São Paulo Regasification Terminal (TRSP) with an expected start-up of operations in 2023.
- **Reduce the average third-party damage rate by 15% (in relation to the projection*) in the Comgás distribution pipeline network in the period from 2021 to 2025** – In 2021, we opened our new Operational Control Center and entered into a partnership for integrated action with other concessionaires through the Integrated Operations Center (COI), of the São Paulo City Hall, mitigating the risk of third-party damage. In 2021, we had a 22% reduction in the average third-party damage rate in the Comgás operation, compared to the initial damage projection for the year.

*The third-party damage rate is projected considering the variation of Brazil's Industrial GDP in the year.



Acknowledgments and highlights

The performance of our distributor Comgás was recognized by the market in 2021, with relevant awards and prominence in indices.



Gender Equality Index – for the second year running, we are among the Brazilian companies participating in the Gender Equality Index, of Bloomberg.



Honorable Mention at the 2021 WEPs – During the Women Empowering Principles (WEPs) Awards, we received an honorable mention for working with a focus on ensuring the health, safety and well-being of our employees.



Troféu Frotas e Fretes Verdes Award – Comgás was recognized for its innovation and good practices in process, product and sustainable mobility.



Carbon Disclosure Project (CDP) – In our debut in the main climate change framework, we received a “B” score, on an A to D scale.



American Gas Association (AGA) – We were once again recognized for being among the natural gas companies with the lowest rate of occupational incidents related to their direct employees, classified as sick leave and restricted work.



GHG Protocol - Gold Seal – Since 2018, Comgás has been monitoring all Greenhouse Gas (GHG) emissions based on the guidelines of the Greenhouse Gas Protocol and its national version, the Brazilian GHG Protocol Program. In 2021, the distributor received the Gold Seal of the Program, in recognition of the commitment and transparency in the mapping, quantification and management of GHG emissions.



Value **people**
and **society**

4

Our Team

GRI 103-2 | 103-3 | 102-8 | 401-1

Our organizational culture, which guides our way of working and guarantees our strategy of sustainable growth in the long term, is the result of a team of talents formed by people who came from companies of the Cosan Group, Comgás and the market, having in common attitudes such as agility in decision making, entrepreneurial vision, security as a primary value and recognition for meritocracy. Following this North, at the end of 2021, our team had 1,171 employees (1,105 at Comgás), all full-time and working in the Southeast Region, 68% men and 32% women. We also had 14 interns and 24 apprentices at Comgás and three interns at Compass. During the year, 197 people were terminated or chose to follow new directions (132 men and 65 women), and 158 were hired (78 men and 80 women).

Although we are still feeling the impacts of the second year of the Covid-19 pandemic, with 184 confirmed cases in our teams (in 2020, there were 127 cases), the adaptations and actions performed in 2021 to ensure health and safety proved to be effective and, despite the increase in cases, no fatalities were recorded. We encourage employees to get vaccinated and keep close monitoring of all cases of Covid-19 among employees and their families - from 2020 to 2021, around 3,200 services at the Comgás outpatient clinic, facilitating access to diagnosis and mitigating undue exposure to the virus. virus in emergency care -, in addition to initiatives such as:

- Lectures, safety moments, Integrated Daily Conversations (CDIs), which address topics of safety, health and quality of life, and informative materials, for guidance to employees and their families;
- Institution of scientifically validated Personal Protective Equipment (PPE) to protect against the Coronavirus, as well as lectures and explanatory videos, pointing out the importance of PPE, the proper form of use and storage;
- Restriction on the number of occupants per fleet vehicle;
- Institution of a vaccination campaign against influenza, avoiding a confounding factor for Covid-19, extended to third-party employees;
- Application of symptom screening questionnaires to employees who performed face-to-face activities;
- Specific action of mapping and prediction of percentage of immunized against Covid-19;
- Awareness of the importance of vaccination and demystification of immunizers, with a high level of engagement: by the end of 2021, practically all of our employees were immunized with at least one dose of the Covid-19 vaccine;



- Expansion of the Amigo Program, already widely disseminated and with an even greater focus due to the pandemic scenario, in its aspect called the Ombro Amigo Program, aimed at our partners, with support in the mental health of their employees and dependents, both for anxious processes triggered by the pandemic, and to assist in the grieving process among those who have lost close people by the virus.

Our activities are essential and, due to their characteristics, the presence of part of the team is essential, both on the streets, in homes and commercial and industrial establishments and in our Operational Control Center. For these teams, we reinforce the safety and support protocols of the medical team. With the advance of vaccination - 99.84% of our staff had received the first dose and 96.71% the second at the end of the period – we plan for 2022 a hybrid work model, with a three-day journey in corporate offices and two-days of remote working. Already planned, this new model will only come into effect when the control of the pandemic and the safety of employees show an improvement in their rates.

Our North [GRI 103-2](#) | [103-3](#)

The year was marked by the active listening of our employees to, in a simple and direct way, describe our essence and our way of relating and doing business. They were called “Our North” and presented with the symbology of a compass, which guides us on the path to be followed and reflects the way we practice and share our values every day. Each of our three values reinforces attributes and behaviors that we encourage in our team. Therefore, we have a strong culture, essential for the growth journey we envision, towards our greater purpose of transforming the gas and energy sector in Brazil, offering options for the market that will be increasingly free. We will do this by directing all our actions through Our North, from capital allocation and new projects to our future leadership pipeline.

OUR NORTH

DRIVEN BY

Creating options for an increasingly free gas and energy market

Always bold

There are good and authentic people here, capable of making unlikely connections without fear of making mistakes and learning. A team that starts from the client to question the status quo and look to the future, delivering concrete results with a positive impact.

Always connected

We are stronger doing it together. We listen and create from different points of view. And that’s why we don’t give up empathy and diversity.

Always transparent

In the pioneering field, everything is relative, except ethics and safety. Here, the conversation is open, the cards are always on the table, and trust sets the tone for relationships.





Communication and engagement

Boosting the connection between teams, our digital internal communication platform Workplace was once again a highlight in 2021, bringing employees together in the context of remote work. Through the system, teams share ideas, achievements, and leisure time, strengthening the alliance.

As part of valuing the process of listening to our professionals, we promoted the first Pesquisa de Cultura e Engajamento Compass (Compass Culture and Engagement Survey), which reached 95% adherence, 95.3% favorability and an overall score of 8.7, on a scale from 0 to 10. At Comgás, the “Você Fala” (You Speak) survey was performed again, also with good results: 86% engagement and 85% favorability.

Diversity

GRI 103-2 | 103-3 | 405-1 | 405-2 |

We believe in the strength of a diverse team and we invest in strengthening this agenda towards our commitment to equity, equality, and strengthening a humanized and respectful environment. We hired a consultancy specializing in diversity to guide us in literacy, acculturation, and effective strategy development, with the engagement of our leaders. At Comgás, since 2020, we have maintained a Diversity Group, part of the “Comgás Para Todos” (Comgás For Everyone) movement, and a Diversity Ambassador Group, formed by internal influencers. In 2021, we performed a consultation to understand the doubts and anxieties of our employees, to prioritize concrete and affirmative actions, with a participation of 74%.

We seek knowledge and consistent results and, therefore, as our first challenge, we chose gender equality, especially with women in our leadership positions: at the end of 2021, they occupied 34% of these positions - and, at Comgás, we currently have the first woman in the Operations Department in the entire history of the company (women occupy 38% of leadership positions at Comgás). Overall, 32% are held by women. In addition, there is no difference in salary or compensation based on gender, but rather in terms of performance and contribution to the achievement of our strategic objectives.

With this positioning, in 2021 we celebrate Comgás' entry into the Bloomberg Gender Equality Index (GEI), achieved again in 2022, being one of 13 Brazilian companies within the universe of 418 publicly traded companies, from 45 countries, committed to supporting gender equality. Companies were evaluated according to criteria of female leadership, salary parity, inclusive culture, sexual harassment policies, and pro-women branding. In addition, in 2021, we were recognized with an honorable mention during the WEPs Award - Women Empowering Principles. [GRI 102-12](#)

We also seek to strengthen diversity and inclusion in training processes, meetings throughout the year with the entire team for Talks, campaigns focused on awareness and literacy, with training on unconscious biases for leadership, directors and the People and Culture team, and **training for women gas workers (learn more in the topic Contribution to Society)**. During the year, we also performed actions on specific dates, inviting employees to share enriching experiences. Examples were actions on Black Awareness Day and LGBTQIA+ pride month, in which we also used the colors of the movement in the Comgás logo to intensify the flame of our team's pride.

2021 Campaigns:

International Day of Persons with Disabilities
Black Awareness Day
Yellow September
Fighting Fatphobia
Fighting domestic violence
LGBTQIA+ Pride Month
Women in science
Religious freedom
International Day against LGBTPhobia
Achievements of Feminism
Fighting xenophobia
Inspiring women
International Day to Fight Racial Discrimination
Valuation of Diversity
Unconscious biases
Trans Visibility Month

Commitment to gender equality [GRI 102-12](#)

We believe that gender equality should be a public commitment for a better world and, in 2021, we reinforced this position with the signature, by Comgás, of the Women Empowering Principles, by UN Women Brazil and *Rede Brasil do Pacto Global*. During the year, we also signed a partnership with the **NGO Mulher na Construção**, with a view to engaging in literacy actions on the inclusion of women to strengthen female interest and representation in the civil construction and gas job market.



Development and evaluation

GRI 404-1 | 404-2 | 404-3

We value the culture of humanized high performance, with autonomy and meritocracy, and we invest in the development of technical and behavioral skills. We believe that our leaders have a fundamental role in the development and acculturation of the teams and, therefore, in 2021 we promoted training involving not only senior, but middle management and employees identified as possible successors to management positions.

In 2021, we restructured the leadership training strategy and launched, at Comgás, the Liderando Program, with the objective of developing this audience to act with high humanized performance, guided by a vision of the future and support for corporate strategy. The program was structured around five pillars of continuous development: high performance, humanization, self-knowledge, strategy, and fundamentals of people management.

Also at Comgás, for synergy between executives, we maintained our leadership forum, called “Conectados” (Connected), with monthly meetings between the CEO and the entire Comgás leadership, with the objective of generating rapprochement, promoting a single vision of leadership and connecting distributor topics.

The year was also marked by the launch of the **Virei Líder e Agora?** (I Became a Leader, What’s next?) Program, which aims to support professionals who assume the role of managers for the first time. So, the trail brings concepts, situations and exchanges of experiences to the demands in the transition to the first-leadership pipeline.

At Compass, we created a leadership forum, with the main leaders of all companies, called “Papo Compass” (Compass Talk), in which we inform about the strategy of each of the business lines, our challenges, our opportunities and especially our cultural alignment between companies, which guarantees focus and uniqueness of values.

In addition, in 2021, all employees (100%) received a performance evaluations based on their performances.

Take-off Program

In 2021, we launched the Decola (Take-off) Program, which aims to accelerate the careers of senior professionals and specialists to assume a leadership pipeline, through an exclusive path of development of strategic competences. The program lasts for six months and has 20 professionals in this edition.

Training portfolio

We invest in the continuous development of our employees, through online platforms, with a portfolio of training aimed at improving skills for the exercise of their functions. In 2021, we supported the specific learning module on our Conecta platform, focusing on self-development and training aimed at improving behavioral and technical skills, with a view to boosting our team's knowledge and career. Actions include:

Trainee Upper Program: it seeks to attract full- and senior-level professionals in the market, with a view to accelerating career development for leadership positions. The program lasts for one year and the trainee has the opportunity to perform a job rotation in another area and another project in the middle of the program, with the objective of expanding knowledge about the business and career development

Internship Program: It aims to attract and professionally develop young people who are pursuing Higher Education. The program lasts for one year, with placement of interns in strategic projects, in addition to a job rotation of area and/or project after six months.

Aligned with the purpose of transforming life through education, 31% (8 out of 26) of our young apprentices were students of Escola Estadual São Paulo, in which we work through volunteer programs in an agreement signed with the NGO Parceiros da Educação

During the year, the average training period was approximately 6 hours per employee, with almost 7,000 hours of training being offered. In addition to these trainings, we offer other development opportunities, such as Integration sessions for new employees, Sales Training, Career and Mentoring Workshops, Leadership Development, and Open Talks to all employees.



Compensation and benefits

We believe in the contribution and development potential of all our employees, and we establish remuneration based on a job evaluation methodology defined corporately by the Cosan Group; without any distinction in the salary floor for men and women, or any other difference, with the exception of what fits in the methodology itself, which considers experience and seniority. [GRI 202-1](#)

We also seek to recognize the contributions and value of our team by offering a wide package of benefits, which includes medical and dental assistance; private pension; pharmacy assistance; reimbursement for hearing aid, orthopedic material and eyeglass lenses; psychological, legal and financial assistance; scholarship; meal ticket; food ticket; sick pay; and payroll loans, among others. As a citizen company, we also offer extended maternity/paternity leave (180 days for women who have a lactary on their return to work, and 20 days for men and, in the case of adoption, 45 days) and day care assistance. In 2021, we recorded a retention rate, after leaving and returning to professional activities, of 76% among women and 63% among men. [GRI 401-2 | 401-3](#)

With the purpose of helping families in the planning phase of adoption or pregnancy, we created the Comgás Family Program, in partnership with Instituto Mame Bem, which offers a six-axis training trail and 12 classes that address topics such as childbirth, adoption, breastfeeding, food introduction, and child development. We believe that families come in all shapes and sizes, so the course is open to everyone and everyone who already has, or who are thinking of forming a family. The training aims to emphasize our concern to contribute greatly to the experience of motherhood and fatherhood with a careful, inclusive, human and integral view.

Health and safety

[GRI 403-1 | 403-2 | 403-3 | 403-4 | 403-7](#)

To ensure everyone's health and safety, we maintain the Health, Safety, Environment, Quality and Asset Integrity Management System, applicable to the entire business portfolio and adopted based on recognized references, such as ISO 45001 - Occupational Health and Safety; ABNT/NBR ISO 14.001/2015 - Environmental Management; ISO 55.001/2014 - Asset Management; and ISO 31000/2018 - Risk Management - Principle and Guidelines. The System encompasses guidelines for the entire cycle of activities, from conception, planning, executive design, construction and commissioning, to effective operation. In addition, we operate with a focus in operational excellence, with the commitment to sustainable development, safety and the integrity of people and assets.

Due to the specific nature of its operation, Comgás has its own Occupational Safety Management System, which aims to improve processes and improve the safety culture among its own employees and third parties. The System was implemented based on legal requirements and current regulations applicable to the business, mapped with the support of specialized consulting, with continuous monitoring and updates. To this end, requirements are managed and evaluated monthly or whenever there is a change in municipal, state and federal laws and regulations. There is also an annual audit of the System to identify the correct use of the platform and the quality of the responses and evidence included in each current and applicable legislation/standard. Comgás also has a person responsible for OHS, whose role is to ensure the implementation of a safety culture based on legal requirements, current regulations and best practices.

Our Health, Safety, Quality and Asset Integrity Policy also determines to ensure the safety and health of employees, customers, people and communities involved or affected by our processes, projects, and operations. At Comgás and other companies, before the start of each activity, safety impact assessments are performed based on the Job Safety Analyses (JSAs). For the most critical activities, Permits to Work (PTWs) are issued in advance by a duly qualified professional. Employees are also constantly made aware, communicated and trained for the safe performance of activities and have the autonomy to identify risks and the responsibility to act in order to mitigate them. It supports the adoption of applicable tools according to the project or operation involved, such as, for example:

- Registration of occupational health and safety risks;
- Registration of environmental risks;
- Job Safety Analysis (JSA);
- Analysis of failure modes and qualitative effects;
- Failure mode analysis and quantitative critical analysis;
- Safety cases;
- Cause and effect and bow tie diagrams;
- Risk identification and quantification tool;
- Hazard and operability studies;
- Communication and engagement, with announcements of meetings and safety alerts.

Any accidents must be expressly reported so that an investigation can be initiated, with a view to eliminating the root cause and updating the risk matrix. Lessons learned, corrective measures, and potential consequences are widely disseminated to avoid the recurrence of events of the same nature. Thus, there is monthly monitoring by the Executive Board and the Board of Directors of the lost time work-related injury rate indicator (LTIF) in all business areas. At Comgás, we have monthly committees with the Board of Directors and Managements to discuss the main themes of the period, their indicators and results. In addition, we have a monthly chat with contractors to discuss security.

Visible Leadership

We believe that leadership involvement is extremely important to ensure safe working conditions. Therefore, in 2021 we created the *Tour de Liderança em SSM* (HSE Leadership Tour) program, which aims to involve senior leadership in our operations, working in the field. Another novelty was the *Ondas de Segurança* (Security Waves), with the participation of managers, engineers and technicians in specific regions and with determined frequency.

Training GRI 403-5

Based on regulatory standards and internal procedures, we offer various training in health, safety, and environment to Comgás employees. The training extends to the safety of our processes, for the correct performance of activities and a lower risk of damage and operational incidents, with a strong contribution to the safety of society and the environment in which we operate. In the year, there were more than 10,500 hours of training just for Comgás’ employees - an increase of 41% in hours compared to 2020.

Total hours of occupational health and safety training ¹ GRI 403-5		
	2020	2021
Employees	7,479	10,582
Contractors	1,963	3,718

1. In 2020, only normative training or training developed by the company’s HSE area was considered. As of 2021, the Knowledge Management area has compiled data that includes all training related to occupational health and safety of employees and partners and operational safety.

Health and safety performance

GRI 403-9 | 403-10

With the exception of Comgás, the activities provided by our employees in 2021 were eminently administrative, with occupational safety risks related to ergonomics (activities that involve monotony and repetitiveness, such as typing and sitting posture for long periods), as well as situations that cause psychic stress (work organization). However, no health changes related to these risks were identified, mitigated with the offer, considering the remote operation, of adjustable furniture, avoiding overloads in the lumbar, thoracic and cervical spine, knees, hips, shoulders and wrists. In addition, we guide our people on the positioning of keyboard, monitor and mouse, and ways to avoid joint overload and visual fatigue. During the year, we also did not record any deaths, injuries, or incidents resulting from work activities.



Comgás has an Occupational Safety team, responsible for risk analysis in the work environment, through field visits, objective measurement of risk factors, and segregating work activities into homogeneous exposure groups.

Field professionals receive Personal Protective Equipment (PPE) to reduce the impact of possible risks, and specific training recommended by regulatory standards. All employees perform occupational and care outpatient follow-up to help map risks at work, as well as changes that may be related to the work activity.

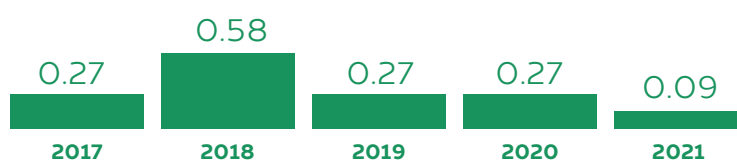
Through on-site inspection, we also follow up 23 construction sites and eight accommodation units of partner companies. It is also evaluated the Occupational Health Medical Control Program (PCMSO) and the Program of Environmental Risk Prevention (PPRA) of the employees of the 16 partner companies that participate in the Excelência (Excellence) Program, totaling 2,800 contractors.

In addition, whenever an accident occurs, we perform investigations to understand the root cause and take corrective and preventive actions. Thus, we capture the lessons learned and correct the operational, organizational and managerial processes so that there is no recurrence of an event of the same nature. Due to the commitment to the theme, the annual performance in operational safety is considered in the variable remuneration of all Comgás employees. We ended the year with a high-consequence work-related injury rate (LTIF)¹ at 0.09. It was lost time in about 10.7 million hours worked. Evaluating work-related reportable injuries (TRCF)², we recorded a rate of 0.83, with a total of nine reported cases. In addition to reportable incidents, we had 32 first aid cases in 2021.

One of the main safety risks in Brazil, which extends to our operations, is related to traffic accidents: in our workforce, 60% of employees use vehicles as a work tool and we recorded 38 incidents with motor vehicles in a total of 8.8 million kilometers traveled without any fatalities. To minimize this risk, we offer continuous safe transit training and refresher training - a mandatory requirement for our drivers. Also, 100% of the fleet has telemetry sensors, which results reports are analyzed daily by managers for the preparation of corrective actions.

Employees with good results (no fines in the month) are classified as reference - in the year, 65% of professionals were considered reference drivers.

LTIF (Lost Time Injury Frequency) - Employees and contractors¹



1. High Consequence Injury Frequency Rate: Our Lost Time Incident Frequency (LTIF) indicator, in which we consider the number of lost time occupational accidents per 1,000,000 hours worked.

2. Reported Occupational Injury Frequency Rate: Our Total Recordable Case Frequency Rate (TRCF) indicator, which considers the number of occupational accidents with lost time or restricted work, per 1,000,000 hours worked.



Health promotion GRI 403-6

At Comgás, we offer the following health benefits to employees and their dependents:

- Subvention of 50% on the purchase of non-generic medications and from 70% to 100% for generic medications (according to salary ranges);
- Health and dental plan;
- Subvention of R\$ 1,000.00/year for the purchase of eyeglass lenses;
- Benefit to stimulate physical activities (Gympass);
- **Employee Assistance Program**, provided by the Amigo Program, allowing employees and their legal dependents access to psychotherapeutic support, social assistance, judicial guidance and financial guidance, 24 hours a day, seven days a week, at no cost to the worker;
- Access to the Comgás medical service for face-to-face or tele-service consultations (only for employees).

We also perform annual influenza immunization campaigns, extended to legal dependents; smoking cessation program, with medical follow-up at the outpatient clinic and full subsidy for the medications used in the treatment; and, in the outpatient clinic, diagnosis, treatment, guidelines, second medical opinions, and other health care. In all actions, the confidentiality of personal information related to health is guaranteed, kept in an electronic medical record for exclusive access by health professionals at the clinic (doctors, nurses and nursing technicians) and in physical media, stored in a file with lock, with access also exclusive to the medical clinic team. Data referring to the use of health, dental and pharmacy plans are also restricted to the outpatient clinic.

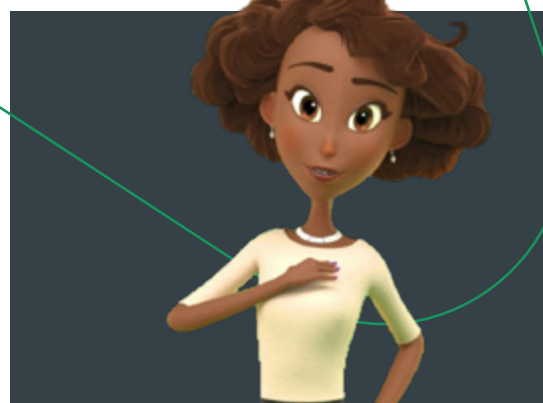
Clients in the center

GRI 103-2 | 103-3

Customer centricity is one of our strategic objectives, meeting the increasingly demanding demands of consumers in an energy market in transition. To maintain our successful trajectory, we are increasingly closer to customers, offering competitive, safe and efficient supply alternatives, continuously pursuing reasonable tariffs and contributing to universal access to natural gas in our concession area. In this way, we are investing in new processes, solutions and technologies, always considering the best experience in the customer journey.

Service and relationship actions

We provide different relationship channels, continuously improved for fast and effective resolutions and services. An example in 2021 was the review of more than 70 features and the creation of another 13 on **Comgás Virtual**, our digital platform of customer service. Investments in virtual relationship channels aim at efficiency gains for Comgás, and more convenience for consumers, with agility in responding to the demands received. We also innovated on WhatsApp (available at 11 3325-0197) with the time forecast for calls, and we created a digital assistant, Cris, which can be accessed via chat on Comgás Virtual or by voice, on our telephone channel.



2021 customer service data



Cris - Virtual Assistant: 65,000 voice calls and 58,000 calls per month via chat



08000 + emergency: 79,000 calls per month, with an average service time of 485 seconds and a Service Level of 98.0%



Chat: 26,000 calls per month and Service Level of 85.4%



E-mail: 6,000 calls per month and Service Level of 84.0%



BackOffice: 16,000 calls per month and Service Level of 94.9%

Debt renegotiation

Through our website and WhatsApp, we once again promoted a wide-ranging debt renegotiation campaign. We offer up to 50% discount on the amounts due, without additional penalties and interest, in addition to the possibility of payment by Pix. In the year, 3,728 customers benefited from the initiative. Another action was the Gasista Quitação, through which we communicated to customers the importance of remaining compliant and thus avoiding cuts due to non-payment. With the action, 3,903 customers benefited from this new functionality.

In October, we launched another innovative service, **Comgás Express**, which speeds up calls made through virtual channels (website and WhatsApp): if requested before 4 pm, they are performed on the same day. In the model, leak repairs, stove and cooktop conversion for use with piped natural gas, heater duct replacements for better equipment operation and stove gas hose replacement due to leakage or wear of parts are available. Also in Comgás Virtual, we maintain the functionality **I want to be a Comgás customer**, so that, in three steps, homes and businesses are connected in a single day after the self-contracting request. The channel grew by 75% compared to 2020, with 6,416 new customers joining.

The improvement of interaction with customers also occurs through award campaigns and with a socio-environmental focus. In 2021, we launched the **Embaixador Comgás** (Comgás Ambassador) Program in Guarulhos, Campinas, and Piracicaba. With the initiative, in recognition of the loyalty of our brand, customers who referred new consumers received points to be converted into consumer goods, supermarket shopping vouchers, fuel vouchers, travel miles, and cell phone recharge, among others.

Between April and August, Comgás intensified communication actions to raise awareness of the use of gas in homes and businesses. In parallel, it created a campaign to clarify the tariff composition to customers and the market. The campaign included publications on social media, account banners and SMS and email marketing to the customer base of all segments. In the end, we achieved a 19.9% reduction in total complaints regarding gas bills compared to 2020. The action reinforces Comgás' commitment to transparency with its more than 2 million customers.

Customer review

Our process of innovation and digital transformation aims to provide increasingly efficient services and assertively meet the demands of current and future customers, for whom we seek to provide the best experience. In this sense, in 2021 we increased our satisfaction survey, measured from the Net Promoter Score (NPS) - there were approximately 100,000 queries in 2020 and, this year, there were around 1 million. In addition, we created **Pulso do Cliente** (Customer Pulse), making NPS results available to all employees and including customer satisfaction in the performance contract of all Comgás managers. We also started to hold some important rites, such as the **Customer Service Forum**, with a weekly discussion of actions relevant to this audience; and **Voz do Cliente** (Customer Voice), in which, at Board meetings, action plans focused on improving satisfaction, service and services provided are discussed. With these actions, in 2021 we advanced 18 points in NPS, which jumped from 32, in 2020, to 50. The percentage of complaints also outperformed, dropping from 7,084 in 2020 to 5,597 - a 20.3% decrease.

Innovation and technology

Comgás invested in the modernization and computerization of field equipment for the automation of the gas pipeline network, through the Comgás 4.0 project, started in 2019. In 2021, 111 new assets now have telemetry and control systems, adding up to 303 modernized stations since the initiative was launched. Another evolution was the launch of the consumption management platform through which more than 70,000 residential consumers with installed remote consumption sensors were able to analyze and simulate the use of natural gas, hour by hour, promoting conscious and intelligent use. The action also aims to bring more comfort and safety to customers, minimizing possible human errors in reading, and contribute to the lower emission of Greenhouse Gases (GHG) resulting from the displacement of readers. **As a result of its benefits, we have committed, starting with the renewal of the Comgás concession, to install 126,400 new remote measurement sensors annually by 2049.**

With the use of intelligence tools, we also promote smarter travel of our professionals, with 100% of technical assistance and emergency services performed with an automated routing tool. The action brings productivity gains, more agile service - with technology, calls are answered in an average of up to 40 minutes - and lower CO₂ emissions.

Stimulating open innovation

In 2021, we launched **Plugue** (Plug), Comgás' open innovation hub, aimed at disseminating knowledge, increasing our ability to experiment with new technologies, generating new business and attracting potential partners to solve together the challenges of the gas and energy sector. Therefore, we invite startups, universities, research institutes and companies to present innovative ideas, solutions and tools in the areas of market intelligence, logistics, supply chain, ESG, smart and sustainable cities, energy saturation and efficiency, among others, promoting and democratizing the culture of innovation.



Discovery / Exploration and discoveries

Acceleration of ideas and Projects

From solution to MVP, from Prototype to Co-To-Mkt

Solution and prototyping

Assessment and structuring of business models

Prospecting, curating, and evaluating startups

Solving complex challenges

At the end of the period, 342 proposals had been registered (167 in Challenges; 46 in Accelerate; 129 through a partnership with 100 Open Startups). We also had 55 subscribers to the Academy, who will undergo a curating process throughout 2022.

In addition, at the end of the period, Comgás' Research & Development (R&D) portfolio had 16 projects, 15 partners and investments of more than R\$9 million.

Operational Control Center

At the beginning of the year, we reformulated our Operational Control Center (Centro de Controle Operacional, CCO), which integrates and brings together, in the same place, the field service dispatch room, emergency management and control room, with gains in operational management, safety, and efficiency. In addition, we signed a partnership with the Integrated Operations Center (Centro de Operações Integradas, COI) of the City of São Paulo, dedicating a CCO operator to work directly on site, which has 62 cameras installed for monitoring with 268-way high technology in the city of São Paulo. The IOC brings together 16 public service companies to work together with the Civil and Military Police, the Metropolitan Civil Guard (GCM), the Civil Defense and the Fire Department in risk situations, allowing for the centralization of public policy management in the areas of service and security, in addition to providing:



- Opportunity in security with the integration of our teams and other service providers;
- Efficiency in joint assistance with Firefighters, Civil Defense and CET and reduction in the emergency response time;
- Support in the mobilization of major emergencies and damage to distribution networks;
- Anticipation of assistance to works that may cause damage to our distribution network;
- Information about distribution networks, active customers and registration status in real time within the COI.

With a focus on reducing damage to our network, we also made progress in offering free training and field guidance to employees of other concessionaires, in addition to supporting public concessionaires with on-site or virtual guidance in the field, with augmented reality resources. **The Shared Works Center** also contributes to protecting our network, which brings more safety and efficiency to the management of the urban underground, and the **Tokyo Project**, started in 2020 and which encompasses strategic actions to prevent damage, proactively working with third-party companies that operate in the Comgás concession area. In 2021, among the highlights, there is the partnership to create a **Damage Prevention WG with the participation of our distributor, Sabesp (sanitation concessionaire) and Enel (power concessionaire), three of the major users of the urban underground, with the support of Arsesp.**

Partnership with suppliers

GRI 102-9 We are convinced of our responsibility throughout the supply chain and, therefore, we adopt criteria that aim to guarantee legality and the generation of value in all activities. One of the aspects observed is integrity: in the pre-approval of potential partners, we perform a Background Check - repeated annually for active suppliers -, with reputation analysis to ensure adherence to our Code of Conduct and applicable legislation. It is evaluated, for example, violations of human and labor rights, such as slave or child labor (not identified in our supplier base in 2021), environmental assessments and embargoes by the Brazilian Institute of the Environment and Renewable Natural Resources (Ibama) - in the base of Comgás' partners, 12 companies (0.7%) had some environmental embargo or assessments performed by Ibama. **GRI 308-2 | 408-1 | 409-1 | 414-2**

We also perform constant analyzes to ensure the levels of our inventories and the continuity of the provision of our natural gas distribution service, essential for well-being of the society and economic development. Our suppliers contribute to this purpose, especially companies that supply natural gas and materials such as tubes, connections, valves and meters; service providers, which work in the construction of networks and branches, internal installations, inspection and customer assistance; and meter readers, who check customer consumption.



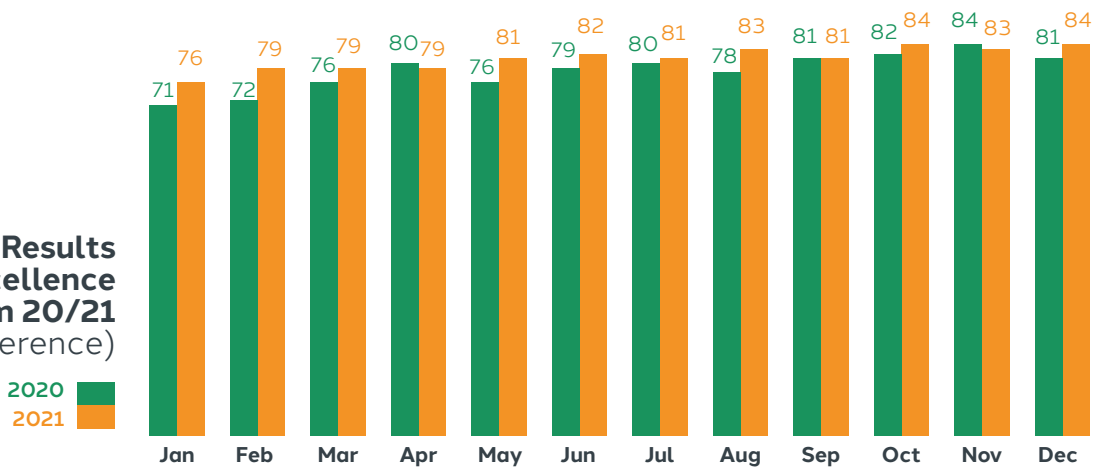
Excellence Program

In its third year, our Comgás Excellence Program has gained even more strength and recorded good results. We revitalized the initiative, which aims to develop the network of suppliers through management based on operational and sustainability performance indicators, encouraging the improvement of critical processes. To this end, we carefully monitor the indicators and develop, together with suppliers, action plans suggested by audits. In addition, we held a series of events and workshops with relevant information on sustainability and ESG principles.

As a result of the actions, we evolved in 2021 in important areas: we achieved the best result, since the beginning of the program, in the basket of safety indicators, the participating companies had no record of incidents with lost time; in the customer basket, we worked to reduce the number of complaints related to external works; in quality and integrity, the network registration indicators stand out, with the challenge of reducing registration time by four days and achieving 98% in this objective. On average, our Excellence Program advanced by 3 p.p. compared to 2020, with an average of 82% adherence - a historic performance!

On the sustainability front, we apply **Letramento Plural** (Plural Literacy), a course to improve the repertoire in gender equity for partners and Comgás. As a result, we developed critical thinking about gender and opened doors in organizations to receive professional women - more than 30 women were hired at different partner companies

Evolution of the Results of the Excellence Program 20/21
(% of adherence)



Contribution to society

GRI 102-12 | 203-1 | 203-2 | 413-1 | 413-2

In 2021, with Comgás, we became signatories of the **Global Compact**, the largest corporate sustainability initiative in the world. Led by the **United Nations (UN)**, the Global Compact is a call for companies to align their strategies and operations to 10 universal principles, in the areas of Human Rights, Labor, Environment, and Anti-corruption. In total, the initiative brings together more than 16,000 members, including companies and organizations, distributed in 69 local networks, covering 160 countries. [GRI 102-13](#)

With the extension of Comgás' concession contract, signed in 2021, the concessionaire will expand its distribution network to 41 new municipalities by 2049, taking investments in infrastructure and technology to guarantee gas supply and energy security, in addition to promoting the generation of direct and indirect jobs and, consequently, the income of the population. To this end, Comgás assumed, within the scope of the 7th Amendment to the concession contract, the following commitments*:

Comgás' Commitments - 7th Amendment to the concession contract

1. Install at least 126,400 remote mediation units between December 2024 and May 2049.
2. Expand the distribution pipeline network by 15,400 kilometers (additional network), between December 2024 and May 2049.
3. Connect 2,310,000 new consumers between December 2024 and May 2049.
4. Expand the distribution network to at least 41 new municipalities in the concession area by May 2049.
5. Encourage the inclusion of biomethane, gas of renewable origin, in the supply portfolio, as long as competitive.

Training of gas workers

In line with our purpose of changing lives through knowledge and development, focusing on inclusion and diversity, in 2021 we performed a partnership with the Faculty of Technology of the State of São Paulo (Fatec) to offer the Gas Worker course (a profession mostly performed by men) to the female audience. In partnership with Minha Chance (My Chance), a professional training program run by the government of the State of São Paulo that prioritizes low-income and socioeconomically vulnerable people, the action had 72% of students graduated, with 32 professionals already hired (five at Comgás).



* Provided that approved in the RTQs (five-year tariffs reviews).



Social responsibility

In the planning of each project, we perform prior assessments of our potential impacts on the surroundings, with a view to sustainable performance, an effective contribution to local development, and the generation of long-term value. This purpose is materialized, for example, in the design of the implementation project for the São Paulo Liquefied Natural Gas Regasification Terminal (TRSP) - which is in the implementation stage in Baixada Santista and, therefore, does not yet have any impacts arising from its operation.

The project was born from a locational risk analysis, with a focus on the population surrounding Santos and, from the beginning, included frequent contacts with the local community, in order to listen to them and capture their perception, considering the local demands in the environmental studies that would be performed. In addition, we defined an environmental indicator to monitor the planning of the TRSP, referring to the environmental compliance of the work, measured by the compliance with the monitoring programs (campaigns provided and required in the environmental license, considering their frequency and requested analyzes). Throughout 2021, all monitoring campaigns were performed on schedule, meeting the indicator, without deviations. Moreover, despite the extension of the schedule, after evaluation of the Environmental area, it was decided to keep monitoring critical programs before the start of works. As a result, seven previous campaigns were performed, and the license requested only two.

Also, due to the location of the development in the Santos Estuary, which includes an artisanal fishing community, the Basic Environmental Plan included programs dedicated to this community, such as the **Fishing Support Program**. With the action, it was possible to identify the lack of information technology infrastructure in the Fishermen's Colonies, entities responsible for assisting artisanal fishermen in their needs. Thus, we provided the necessary computer equipment for the activities of five colonies.

Also with a focus on local development, we encourage, for fishing communities, the performance of the Professional Fisherman (POP) training course, a certification for access to closed-season insurance, guaranteeing income during conservation periods of fishing species, in which the activity has to be stopped. With our dialogue, the Navy opened an extra class in 2021, with 36 participants. In addition, we provide study materials and form a partnership with UniSanta, which provided its pool for the required swimming tests. All participants, including three women, received the certificate. In 2022 we will continue to encourage and support the community with training in courses provided by the Navy and other entities such as Senai.

From an environmental viewpoint, already in the conception of the TRSP project, we included as a premise the adoption of the best constructive practices, with a view to minimizing the impacts on the environment, mainly related to the suppression of vegetation, with consequent loss of biodiversity. In this context, we opted for a non-destructive method of directional drilling, which avoided the need to suppress vegetation in an area of 3.14 hectares, in addition to not interfering with water courses - which would occur in the case of construction by ditch method.

In addition, we chose to insert the regulation and measurement station - the custody transfer point for natural gas - in an industrial area of Cubatão, already anthropomorphized. Other actions included:

Ilha Limpa Project – With the Municipality of Santos and in compliance with the Neighborhood Impact Study, as part of the compensation process, we allocated resources to the Urban Development Fund (Fundurb) of the municipality of Santos, for use by municipal authorities in urban infrastructure requalification projects. In addition to the compensation, a recycling and composting project is ongoing on Ilha Diana, mainland area of Santos, at the confluence of the Diana River with the Santos Estuary, which is home to a traditional caiçara fisherman community. The project was named Ilha Limpa (Clean Island), with its own logo, and aims to promote the separation of waste produced by residents of Ilha Diana into at least three fractions (organic, dry recyclables and tailings), with organic waste transformed into fertilizer in the location.



Ilha Limpa Project on Diana Island
in the Santos Estuary



Fishing Monitoring Program

Cotia Pará Park –In compliance with the Neighborhood Impact Study of the City of Cubatão, we invested resources in the Housing Fund, which will be allocated to the development of public education infrastructure in Vila Esperança, a poor community in the municipality. With a focus on sustainability and in agreement with the Department of the Environment, it was proposed a review of the Management Plan for Cotia Pará Municipal Park, an important green area in the middle of the city. The review of the Management Plan, with the updating of the diagnosis and evaluation of the planning and management, aims at the inclusion of this Conservation Unit in the Law of the National System of Nature Conservation Units (SNUC). The work had the direct participation of the community, which participated in diagnostic and planning workshops, for the exhibition and debate of the results of the new zoning, planning and management programs of Cotia Pará Park.

Training – We seek to help fishermen have access to new sources of income through training actions, disseminating platforms for offering professional training courses, such as those of the Santos Port Excellence Center (Cenep) and the National Service for Industrial Learning (Senai), as well as structuring specific courses that will continue in 2022.

Instituto Elos – We voluntarily entered into a partnership with Instituto Elos, non-profit institution with extensive experience in social projects in the region, to act on two axes: territorial development, specifically for the fishing village located in front of the TRSP, and promotion of fishing, with broad community participation in defining the best social organization.

Socio-environmental management at Comgás GRI 413-2

At Comgás, the socio-environmental impact assessment of works and projects is performed during the environmental licensing process, required for the implementation and operation of the gas network, with the monitoring of the programs performed, the results of which are periodically sent to the granting authority (Government of the State of São Paulo). The entire distribution network (100%) is licensed, and the environmental licenses and their respective reports are available to the general public on the Comgás' [site](#).

In compliance with the environmental licensing processes, we promote several initiatives, such as social communication and environmental education programs, in addition to mapping the stakeholders for effective implementation of communication plans, mainly in carrying out works and expanding the network. Therefore, the population is engaged and communicated about the stages, duration and potential impacts of interventions in their regions. In addition, we maintain an Ombudsman and several **service and relationship channels** with customers, local communities, and other stakeholders.

The main impacts are associated with the implementation of natural gas distribution networks, but the interventions occur, for the most part, on paved and already consolidated roads. Regardless, we use constructive characteristics (non-destructive method) that do not generate significant ground movement. Still, a potential negative impact is the risk of erosion and silting. In addition, the period of execution of works can cause minor inconveniences to the population neighboring the installation sites of the natural gas distribution system, with the generation of dust and particulate material, arising from the movement of soil masses, during the opening of ditches and drilling wells; generation of noise during the operation of the necessary machinery; total or partial blockage of the roads during the activities of digging the trench and laying the pipe; increase in local traffic, due to the movement of machinery, equipment, workers and vehicles from the operational fleet; and local waste generation. As a benefit, we recover and seek to return the roads eventually affected during the works in better conditions than those presented before our intervention. To do so, there is:

- Placement and maintenance of signaling in the affected sections until the conclusion of the works;
- Scheduling the execution of works on days with lower traffic flow, in agreement with the manager of the transit route in question;
- Use of construction sites with existing infrastructure (water, sewage, electricity, telephony, etc.);
- Promotion of recycling and reuse of waste subject to such destination;
- Noise reduction, especially at night, with the use of asphalt cutting equipment, avoiding the pneumatic breaker; and adjustment of vehicle engines and equipment, thus avoiding noise;
- Dust containment, through the humidification of land roads using a water truck.

In order to minimize traffic, Comgás foresees the intensification of signs and their implementation in accordance with the “Standards for Signaling and Execution of Works on Public Roads”; requirement of at least warning signs regarding the existence of works; warning signs relating to the nature of the situation/work (lane narrowing, deviation, speed, etc.); cones and/or beacons and barriers to channel traffic. In the case of operations that require partial road closures or deviations from routes, we call the responsible local authorities for joint work.

To minimize all these impacts generated by the network construction works, Comgás developed a communication plan with the objective of informing residents in advance and transparently about the works.

Disclosed between April and December in eight regions, the plan was broadcast on social media, programmatic media, billboards, advertisements in newspapers and local radio stations, in addition to other media such as push notifications and Waze.

In addition, a landing page was developed to explain in detail the step by step of the work (<https://virtual.comgas.com.br/campanhas/obras>). By clicking on ads or scanning QR Codes present in communication pieces, users impacted by the media are directed to the page.

The same landing page is also now available on our service channels (toll-free, chat bot, and WhatsApp), ensuring that residents impacted by the network construction works who contact Comgás have clarity of the entire work step by step .



Incentive and volunteer projects

Our entry into the municipalities is accompanied by social actions, performed through volunteer work, partnerships and incentivized programs. For the past five years we have had an agreement with the NGO Parceiros da Educação, through which we sponsor two schools, the EE São Paulo (continuity project) and a school in Indaiatuba (SP), for actions via a volunteer project. In addition, in 2021 the partnership included the implementation of a work plan focused on pedagogical strengthening of pre-selected institutions and improvement of education evaluation indices. With a donated amount of R\$ 163,909.41, we benefited around 640 students and 49 professionals, including the management team and teachers, in the state schools São Paulo and Camilo Marques. Other initiatives of the period were:

Donation of food baskets – In June, we donated 1,000 food baskets to the São Bernardo do Campo Social Fund and 500 to the Pindamonhangaba Social Fund. On August 26, more than 9,000 basic food baskets were delivered to the Social Fund of São Paulo, donated in partnership with the Social Fund of São Paulo, the Government of the State of São Paulo and Comunitas, a non-profit, non-partisan and independent organization that promotes the sustainable development of Brazil.

Donation of Scholarships – We offer scholarships to students selected by the **Associação Endowment Direito FGV** and approved in the selection process of the undergraduate course in law at Fundação Getulio Vargas. In 2021, the amount donated was R\$ 41,940.00.

On the volunteer front, our employees, considering the impacts of the pandemic, donated 103 food baskets to the Corona no Paredão project, by Gerando Falcões, a social development ecosystem that works in a network to accelerate the power of impact of favela leaders across Brazil; contributed to the Agito Virtual event at Escola Estadual Camilo Marques, with the participation of three collaborators in an action performed in children's month, with the proposal of reflections on the advances in the role of women in society and gender equity. In addition, in Ação Recorde, 34 volunteers contributed in person, enabling the collection of approximately R\$ 37,000.00 for Instituição Acorde. Solidarity through volunteering also had 11 employees registered to offer mentoring at Instituto Reciclar, with a view to guiding young people in their professional trajectory and contributing to their integral development.

Programs supported through incentive laws

Area	Supported projects Institution
Sports Incentive Law (Sports)	<ul style="list-style-type: none"> ■ Running to the future - Phase III (Instituto Vanderlei C. de Lima) ■ Year VI of the Network of Socio-Educational Sports Centers (Instituto Esporte Educação) ■ Formation Through Sport - Development Pillar (Instituto Superação)
Municipal Fund for the Rights of Children and Adolescents (Fumcad)	<ul style="list-style-type: none"> ■ Creative Solutions Workshops (Instituto de Reciclagem do Adolescente (Reciclar)) ■ Culinart (Associação ACORDEL Oficinas para o desenvolvimento humano) ■ Work in Action (Ação Comunitária do Brasil VOCAÇÃO) ■ Access to treatment, quality of life and basic protection for children and adolescents with cancer (Associação Helena Piccardi de Andrade Silva I AHPAS)
Elderly Rights Funds	<ul style="list-style-type: none"> ■ Support for the Elderly (Fundação Pio XII - Hospital do Amor) ■ Senior Rehabilitation (Prefeitura de São Caetano do Sul) ■ Realize (Casa de Repouso e Apoio Geriátrico Vó Laura) ■ Building Health in a Sustainable Way (Casa de Oração Missionários da Luz I COMLuz) ■ Revitalization of cafeterias (Casa São Vicente de Paulo) ■ Equip Laundry to Qualify (Comunidade de Amparo Social e Asilar C.A.S.A.) ■ Implementation of Leisure, Landscaping, and Accessibility Space (Comunidade de Amparo Social e Asilar C.A.S.A.) ■ Implementation of structural repairs (Comunidade de Amparo Social e Asilar C.A.S.A.) ■ Um Sonho de Recanto II: Accessibility and Safety (Obra de Ação Social Pio XII Recanto João de Deus I)
National Program to Support Health Care for People with Disabilities (Pronas)	<ul style="list-style-type: none"> ■ Development of the Skills of People with Intellectual and Multiple Disabilities and TEA at APAE de Diadema (Associação de Pais e Amigos dos Excepcionais – Apae Diadema)
National Support Program for Oncology Care (Pronon)	<ul style="list-style-type: none"> ■ Implementation and Expansion of the Imaging Service with the Offer of Magnetic Resonance Exams (Centro Nacional de Pesquisa em Energia e Materiais) ■ Customized therapeutic testing platform in breast tumors (Grupo de Assistência à Criança com Câncer)



Offer **more**
energy with
less emissions

5

Emissions management

GRI 103-2 | 103-3 | 305-1 | 305-2 | 305-3 | 305-4 | 305-5 |
305-6 | SASB EM-MD-110a.2.

Being aware of our importance in mitigating the effects of climate change, we produce, sell and distribute natural gas, a fossil fuel with the lowest generation of Greenhouse Gases (GHG) and which practically does not emit sulfur oxide, soot, and particulate matter. Our natural gas emits, approximately¹:

- Less 11% of CO₂e compared to Liquefied Petroleum Gas (LPG).
- Less 28% of CO₂e compared to fuel oil.
- 41% less CO₂e compared to coal.
- Less 24% of CO₂e compared to diesel oil.

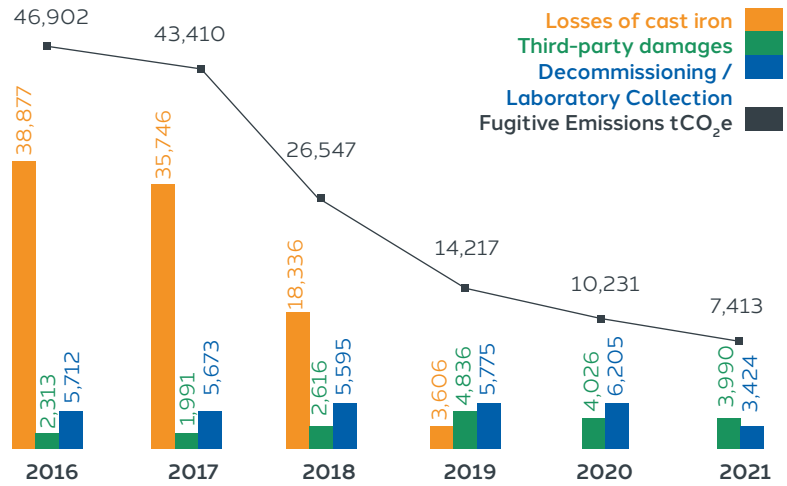
In addition, in 2020, we ended the Cast Iron Network Renewal Plan, zeroing emissions resulting from natural gas leaks caused by cracks in cast iron. Performed over five years, the Plan included the replacement of the iron network with polyethylene (PE), with investments of approximately R\$ 159 million in the renovation of the last 186 kilometers of cast iron in Comgás gas pipe network. As a result, we reduced by 84% the fugitive emissions of Comgás, the company's main source of direct GHG emissions, which in 2016 were at levels close to 47,000 tCO₂e/year.

Another highlight is our Damage Prevention Plan, with actions for the maintenance of our assets, as it helps to control fugitive emissions of natural gas caused by leaks in the network resulting from damage by third-party companies. In addition, in 2021 we adapted the laboratory collection methodology at Comgás, performed to guarantee the quality of natural gas and the required percentage of the odorant. From August onwards, 100% of the collections were performed via bag, reducing the need to "purge" the natural gas in 4.5 minutes per collection. This action contributed to the reduction of 32% of tCO₂e emissions from this activity.

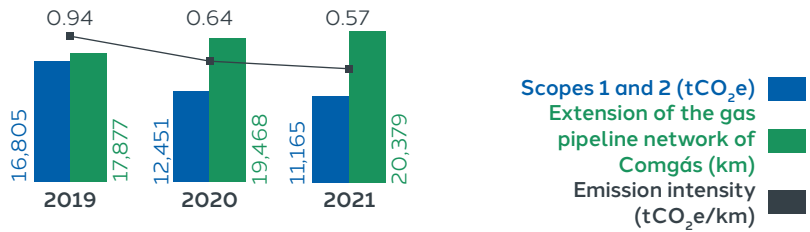
In March, celebrating the Consumer Day, and in June, in celebration of Atlantic Forest Day, we committed to planting a seedling of a tree native to the biome, in the region of Promissão, in the interior of São Paulo, for each customer who opted for the option of receiving the invoice by e-mail and payment by automatic debit. A total of 6,328 seedlings were planted, equivalent to a capture of around 1,050 tCO₂e. [GRI 102-12](#)

¹ According to data from the Intergovernmental Panel on Climate Change (IPCC) report and the National Energy Balance (BEN).

History of fugitive emissions of natural gas in Comgás (values in tons of CO₂e equivalent - tCO₂e)



Comgás emission intensity (tCO₂e/km pipeline network)

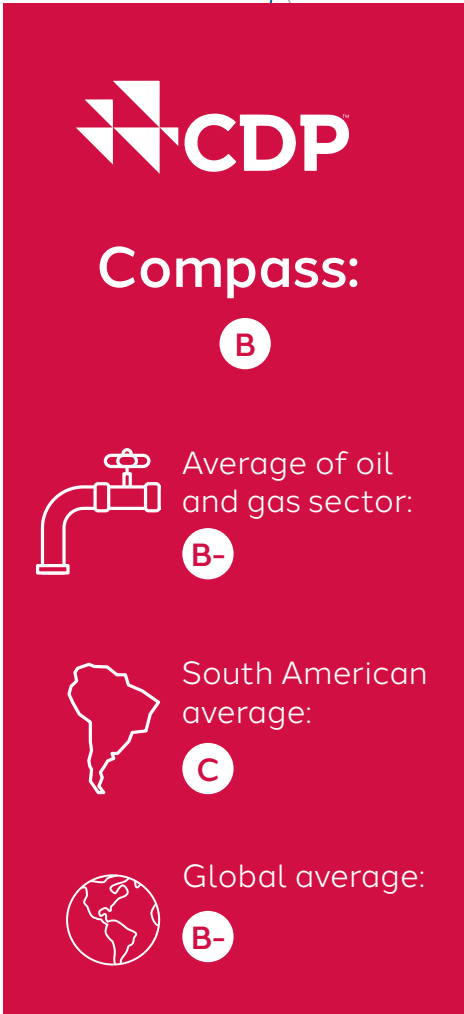


Since 2019, in line with the commitment to minimize the impacts of climate change, we have monitored all sources of GHG emissions by Comgás, based on the guidelines of the Greenhouse Gas Protocol and its national version, the Brazilian GHG Protocol Program. In 2021, we were recognized by GHG with the Gold seal, granted to companies that meet all the criteria for transparency in publishing their emissions data and submit them to an independent institution for verification. [GRI 102-12](#)

Another big step in the decarbonization journey was our debut this year in the Carbon Disclosure Project - Climate Change (CDP), the main global climate change framework. In the first year, we received a grade “B”, on a scale from A to D - recognition of our actions to minimize the environmental impacts of our operations. [GRI 102-12](#)

In the year, we achieved a 6% reduction in emissions from scopes 1 and 2 compared to 2020. This important achievement towards Comgás’ goal of being “Net Zero” in 2025 is mainly due to the adequacy of the laboratory collection methodology carried out to guarantee the quality of natural gas and the percentage of odorant initiatives to reduce the rate of damage to the company’s gas pipeline network caused by third-party companies through the actions of our Asset Integrity Management System. In this System, it is worth mentioning the **Tokyo Project**, which conducts strategic actions to prevent damage, working proactively with third parties operating in Comgás’ concession area; our emergency response management, which aims to reduce the average response time related to leaks; and the front of updating and defining the new as built¹ standard of our network. These actions together represented a 28% reduction (2,816 tCO₂e) in fugitive emissions when compared to 2020, but due to the need to suppress vegetation from the infrastructure works, we had an increase of 2,108 tCO₂e in this category of land use change. The compensation of 14.15 hectares inherent to this activity will take place in the same biome of implementation of the project in 2022.

We also achieved a 11% decrease in the total emissions intensity of the company’s 1 and 2 percent of the company’s pipeline network in the year, even with an increase of 911.12 kilometers in Comgás’ networks, which totaled more than 20,000 kilometers in 2021.



1. NBR 14645-1 “As built”.

Direct Greenhouse Gas emissions - Scope 1 (tCO₂e) GRI 305-1

	2019	2020	2021
Stationary combustion	559.00	830.00	645.65
Mobile combustion	922.00	967.00	887.86
Fugitive emissions in the natural gas distribution network	14,216.00	10,230.00	7,413.46
Other fugitive emissions	748.00	191.00	109.69
Solid waste and liquid effluents	39.00	0.00	0.00
Land use change	0.00	0.00	2,108.27
Total gross CO₂ emissions	16,484.00	12,218.00	11,164.94

Indirect emissions - Scope 2 (tCO₂e) GRI 305-2

	2019	2020	2021
Energy acquisition	321.00	232.00	490.78



Incentive to **biomethane**

With the need to diversify the Brazilian energy matrix and to prepare for a process of transition to a low carbon economy, another goal of Compass is the addition of biomethane in the supply portfolio of the largest natural gas distributor in Brazil, Comgás.

Biomethane, obtained through the processing of biogas, is produced from biomass, which is abundant in Comgás' concession area, considering organic waste from the sugar-energy, agricultural, industrial and sanitation segments of solid urban waste and sewage. The State of São Paulo holds 30.5% of the total Brazilian potential for biomethane production, with 52% coming from the sugar-energy sector. In this context, according to the PDE 2031 Report, produced by the Energy Research Company (EPE), it is estimated that the potential for biogas production in Brazil in 2031, intended for generating electricity, replacing diesel and injecting it into distribution, only for the sugar-energy segment, is 35 million m³/day.

Through existing technologies, it is possible to achieve a chemical composition of biomethane that presents great energetic similarity to that of natural gas, which makes it possible to inject this energy into distribution and transport pipelines - as published by the National Petroleum Agency (ANP) in Regulation No. 685, of 2017, and by the Public Services Regulatory Agency of the State of São Paulo (Arsesp), in Ordinance No. 744 of 2017. Thus, this renewable source can have several applications, such as electricity generation, vehicle use and, especially for Comgás, injection into natural gas distribution networks with the potential to reduce CO₂ emissions by up to 90% in its different possibilities of use, minimizing our Scope 3 emissions and helping our customers to reduce their Scopes 1 and 2 emissions.

In this scenario, in 2021, Comgás joined the Brazilian Biogas Association (ABiogás) to join forces with producers, customers and society to discuss viable models for this renewable energy source. At the same time, the distributor opened, for the first time in its history, a public gas supply call including biomethane, in which 12 different projects were offered, representing approximately 500,000 m³/day of biomethane offered, but still under analysis by Comgás.

Thus, the distributor remains engaged in the development of the Brazilian biomethane market, aware of the major challenges that still need to be overcome so that this energy source can gain scale and following the recent developments in the segment. The goal is, soon, for biomethane to be a decarbonization option accessible to a growing portion of society.

Partnership to accelerate the CNG market

Also to accelerate the development of the Compressed Natural Gas (CNG) and biomethane market for use in heavy commercial vehicles, we entered into a partnership with the bus and truck manufacturer Scania, through Comgás. The objective is to promote the sustainable transformation of the transport sector by increasing the supply of less polluting fuels as an alternative to diesel, boosting the gas market in Brazil. For this, the partnership foresees the mapping of corridors and logistical routes to increase the number of natural gas and biomethane supply points in the State of São Paulo, in addition to contemplating the evaluation for the installation of filling stations in fleet owners' garages and/or bus operators.





Develop the
Country's
infrastructure

6

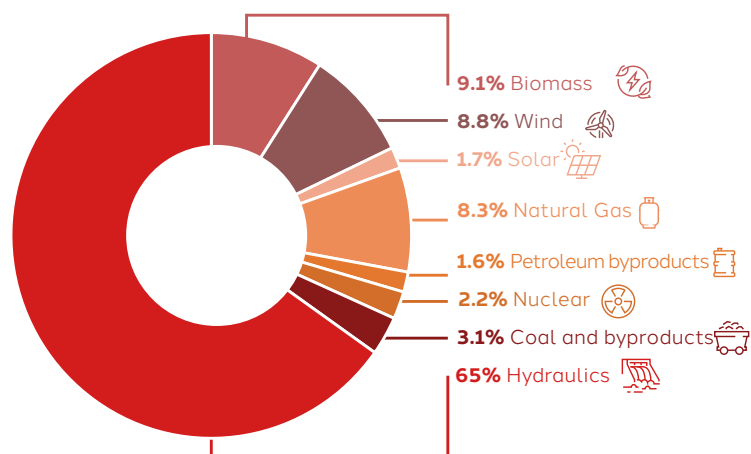
Gas and energy market scenario

The opening of the natural gas market in Brazil registered relevant regulatory advances in 2021 with the approval of the New Gas Law (Law 14,134/2021), regulated by Decree 10,712/2021, which sets a benchmark for the sector in the country by setting rules in areas such as transport, storage, production flow and market capacity.

The Term of Commitment to Cessation of Conduct (TCC), signed in 2019 between Petrobras and the Administrative Council for Economic Defense (Cade), with a view to reducing the company's dominant participation in the sector, also brought advances, especially in the area of gas transportation, with the opening of public calls, and the sale of the participation of the state-owned company in distributors, such as Gaspetro. However, despite these advances, there are still uncertainties regarding access to essential infrastructure.

In the electric energy market, in the context of the biggest water crisis of the last 90 years, investments in the natural gas sector proved to be even more relevant for the security of the national energy matrix, essentially hydraulic.

Brazilian energy matrix



Fonte: EPE | Balanço Energético Nacional 2021

Business strategy

Through our business lines, we are working to consolidate ourselves as a platform for generating value in the gas and energy sector, contributing with the effective opening of Brazil's natural gas market. To this end, our strategy aims to:

- Expand demand and presence in the distribution segment, based on Comgás and new companies in the portfolio, such as Sulgás.
- In the future, operate infrastructure for access to imported natural gas, building a portfolio of diverse sources of supply with a focus on optionality, flexibility, and security. The flow and regasification projects should provide access to more competitive natural gas alternatives.



Distribution

GRI 102-4 | 102-6

We operate the largest distributor of piped natural gas in Brazil, Comgás, which, at the end of 2021, served more than 2.2 million customers, with 130,000 new connections made in the year, with over 20,000 kilometers of distribution network in 94 municipalities out of the 177 in the concession area. Since privatization in 1999, Comgás has had a virtuous trajectory of investment and growth (the number of clients served, for example, has increased more than seven times), with operational efficiency, security and low tariffs.

Renewal of the concession contract

In 2021, with the Government of the State of São Paulo, we signed the 7th Amendment to the Concession Agreement for Public Services for the Distribution of Piped Gas No. CSPE/01/99 of Comgás, extending the concession until 2049. In a market undergoing significant changes, both in the regulatory sphere and in the gas supply scenario, this extension, whose regulatory process took place with transparency and broad participation of society, will anticipate the necessary investments towards the advancement of the expansion of access to natural gas in the State of São Paulo. GRI 102-10

We are therefore committed to performance goals that include connecting 2.3 million new customers and expanding the distribution pipeline network by over 15,400 kilometers, connecting 41 new municipalities until 2049. In addition, the amendment promotes the upgrade of the concession contract, with the replacement of the IGP-M by the IPCA as the readjustment index; the reduction of the inflationary impact that would be paid by residential and commercial customers over the next two years; and the encouragement and inclusion of biomethane, a gas of renewable origin, in the supply matrix, contributing to the decarbonization and diversification of the energy matrix.

In 2021, Comgás started the project called “Strengthening the Gas Infrastructure Baixada - Metropolitan Region of São Paulo”, which is the implementation of a distribution pipeline of approximately 14.7 kilometers long. The pipeline also includes Comgás’ new City Gate, to be installed in the municipality of Cubatão, to improve the security of supply of its concession area.



Acquisitions

In July 2021, still subject to Cade's approval, we signed a contract to acquire Petrobras' 51% share in Gaspetro - a company that holds shares in 18 gas distributors, which exclusively operate local piped gas distribution services in several states of Brazil.

The sale of Petrobras' share in Gaspetro is part of the Term of Commitment to Cessation (TCC) signed between the entity and Cade, to de-verticalize Petrobras in the natural gas chain and stimulate competition in the sector.

In October, we won the auction for privatization of Sulgás, through the acquisition of 51% of the share capital belonging to the government of the State of Rio Grande do Sul. Sulgás is the distributor of piped natural gas in the State of Rio Grande do Sul and operates this service exclusively through the concession model valid until August 2044. Its distribution network totals approximately 1,400 kilometers, serving more than 68,000 customers in 42 municipalities, with a distributed volume of 2 million m³/ day. On January 3rd, 2022, we took control of Sulgás.

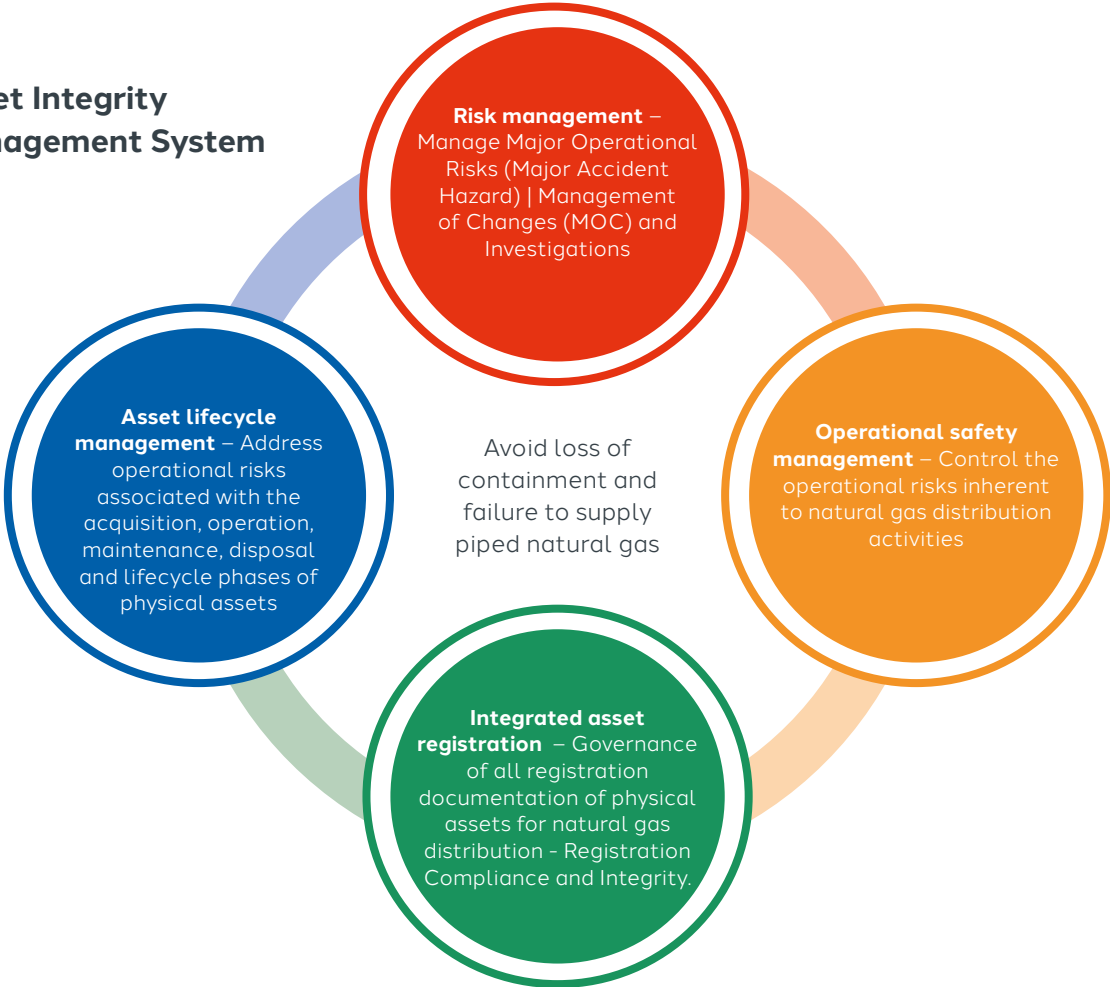
These movements aim to add our experience, with a track record of investment and growth in Comgás, to other state natural gas distributors. With this, society benefits through the expansion of access to natural gas, which guarantees the energy security necessary for Brazil's economic growth.

Assets management SASB IF-GU-540a.4 | GRI 403-1

To minimize the risk of loss of containment and shortages in the distribution of piped natural gas, we maintain a robust Asset Integrity Management System (SGIA), anchored in international references and acknowledged practices, such as the British Standards Institution (BSI), Publicly Available Specification (PAS), Institute of Asset Management (IAM) and the ISO 31000, ASME B31.8S and ISO 55001 series.

Our Asset Integrity area manages 48 performance indicators, also with a view to prevention, detection, control and emergency response. There are two categories: Scorecard (SCR), with five indicators and Critical Security Element (ECS), with 43 indicators, considered the most relevant due to the potential to generate, in the event of failure, a major event. In 2021, we recorded an evolution in the Integrity Basket Scorecard result, from 79% to 100%, compared to 2020. We ended the year with a maximum score of 5.0 (100% - on a scale of 1.0 - 5.0). There was also an advance in the ECS, from 82% to 84% between 2020 and 2021. The score for the year was 4.19 (84%).

Asset Integrity Management System

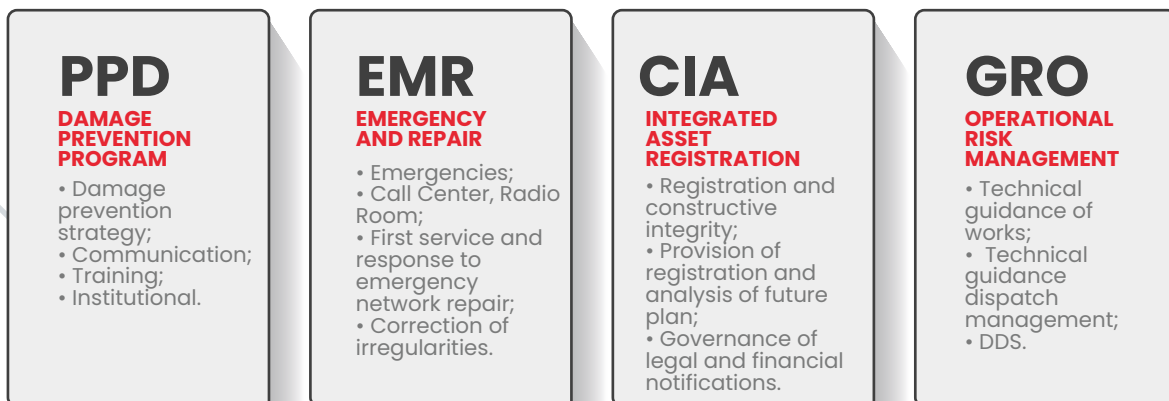


Programs and actions that make up the Asset Integrity Management System (SGIA)

1. Risk Identification and Management Project
2. Pipeline Risk Management and Licensing
3. Steel Networks Integrity Project
4. Tokyo Project: Strategic Damage Prevention Actions
5. Emergency Response Management
6. Asset Compliance
7. Registration Legacy Project
8. Registration Technology: availability, location and identification of networks
9. Operation and Maintenance Focused in Reliability
10. Operational Safety Projects
11. Research, Lessons Learned and Effectiveness of Actions
12. Safety Culture with Leadership Engagement

Our Damage Prevention Management System, which includes a Damage Prevention, Emergency and Repair Program, Integrated Asset Registration and Operational Risk Management, also contributes to the efficiency and safety of natural gas distribution. In 2021, the evolution of the theme took place with the launch of our Operational Control Center (CCO) and the partnership signed with the Integrated Operations Center (COI), of the City of São Paulo.

Damage Prevention Management System



At Comgás, we also maintain an operational support program, being the main operational safety requirements agreed:

- Renovation of networks and branches, with a focus on reducing the occurrence of incidents due to gas leaks and ensuring the supply of user units.
- Renovation of stations, replacement due to life limit or obsolescence (Pressure Reducing Stations, Regulation and Measuring Sets and Mains Block Valves).
- Network reinforcement, with interconnection of mesh and supply systems, including structuring projects (virtual pipelines).
- Network relocation, due to requests from third parties or situations of irregularities, which may compromise the integrity of the assets.
- Network monitoring (Scada), which has the objective of monitoring the pressure, temperature and flow variables of the entire high and medium pressure distribution network, and monitoring the odorant injection rate at the City-Gates.
- Maintenance projects, which include pressure control and monitoring programs, pipeline corrosion control, equipment replacements and application of new technologies.

Emergency Action Plan (PAE)

The Comgás PAE establishes technical and administrative procedures for the control of emergencies (leakage of natural gas and odorant; fire/explosion; lack of natural gas and absence/excess of odorant in natural gas), enabling quick, efficient and orderly actions to minimize damages and losses, quickly restore operations, preserve facilities, community safety and environmental quality. The Plan establishes communication and articulation mechanisms with state and municipal bodies, natural gas supply companies and society in general, for the adoption of appropriate measures to combat and control emergencies.

Emergency calls are categorized into three levels (A, B and C) showing the severity and resources needed to control the occurrence. For the control and emergency actions, a leadership figure is created to centralize the entire flow of communication and decision with a support structure composed of a multidisciplinary team.

Operational results

SASB IF-GU-000.A | IF-GU-000.B | IF-GU-000.C

In 2021, Comgás served more than 2.2 million customers, of which 99% were in the residential segment. In the year, there was a 15% increase in the consolidated volume of natural gas distributed compared to 2020, a period impacted by the Covid-19 pandemic, mainly in activities in some sectors of the industrial and commercial segments. The increase in 2021 occurred in all segments, but compared to 2020, it was the cogeneration and CNG (automotive) segments that showed the greatest recovery, with increases of 29% and 28% in 2021.

In the year, Comgás invested R\$ 1.1 billion, in line with the tariff business plan. With these investments, more than 800 kilometers of pipelines were built, connecting about 130,000 new customers to the distribution network.

Number of customers, per segment	2019	2020	2021
Residential	1,989,004	2,081,466	2,211,826
Commercial	18,652	18,244	18,763
Industrial	1,358	1,400	1,481
Cogeneration	33	29	29
CNG	222	216	214
Thermoelectric	2	2	2
Total	2,009,271	2,101,357	2,232,315

Volume of natural gas distributed, per segment (m ³)	2019	2020	2021
Residential	279,449,607	301,517,141	312,313,921
Commercial	160,573,310	114,919,983	127,996,261
Industrial	3,516,469,008	3,335,512,382	3,804,594,091
Cogeneration	333,800,033	319,907,225	412,153,079
CNG	222,078,986	157,564,689	202,018,647
Total	4,512,370,944	4,229,421,420	4,859,075,999

Volume of natural gas distributed, per segment (MMBTU)	2019	2020	2021
Residential	10,450,621	11,275,884	11,679,653
Commercial	6,004,985	4,297,681	4,786,696
Industrial	131,505,946	124,738,683	142,281,006
Cogeneration	12,483,172	11,963,621	15,413,354
CNG	8,305,123	5,892,472	7,554,923
Total	168,749,847	158,168,341	181,715,632



Compass Infraestrutura

GRI 102-4 | 102-6 | 203-1 | 203-2 | 413-2

Conceived with a focus on diversifying the alternatives for accessing the natural gas molecule, Compass Infraestrutura had two projects in its portfolio in 2021: the São Paulo Liquefied Natural Gas Regasification Terminal (TRSP), in the Baixada Santista, and the Route 4, a pipeline that will take natural gas from the pre-salt layer to the coast.

São Paulo Liquefied Natural Gas Regasification Terminal (TRSP)

After all the licensing procedures, the construction of the TRSP - with investments estimated at R\$ 700 million - began in August. During the year, we completed complex contracting processes, with emphasis on the companies responsible for the dredging stages; engineering, procurement and construction management; and the regasification vessel, acquired in a charter model from the Floating Storage Regasification Unit (FSRU). [GRI 102-10](#)

Completed in January 2022, the first stage of the works, dredging, took place without interruption. With the project progressing according to schedule, the start of operations is expected to be in the first semester of 2023. We will be responsible for managing the Terminal, which will represent a new and important alternative for supplying imported LNG to the Brazilian market.

Route 4 [GRI 102-4 | 102-6](#)

Also in line with our strategy of diversifying access to the natural gas molecule, Route 4 will connect the production sites located in the south part of the pre-salt layer to the mainland. For such purpose, we studied two alternatives for installing an outflow gas pipeline, with a capacity of up to 21 million of m³ of natural gas per day, and a Natural Gas Processing Unit (UPGN). Thus, we continue, in two possibilities of routes, with the studies demanded for the licensing processes.



Compass Comercialização

GRI 102-4 | 102-6

2021 was a year of great learning and skills building at Compass Comercialização. In this process, we strengthened contacts with local producers of natural gas, onshore and offshore, and international ones, such as Bolivia and Argentina. As a result, we were very successful - signing the Liquefied Natural Gas (LNG) contract with Total Gas and Power Business Services for the ten-year supply, to be regasified at the TRSP – still subject to compliance with timely conditions. We thus have security of supply for a long time.

Compass Geração GRI 102-4 | 102-6

Compass Geração's strategy is to develop a portfolio of thermal generation that is complementary and synergistic to the investments already made in infrastructure for the outflow and import of natural gas, contributing to energy security, the increase in the supply of natural gas and, consequently, with the national development.

The increase in cleaner and non-intermittent generation alternatives, such as natural gas, supporting the growth of renewable sources, such as solar and wind, proved to be even more essential in 2021, the year in which we faced the biggest water crisis in the last 90 years, with effects on energy prices, since the national energy matrix is still predominantly hydraulic. In this scenario, there was an emergency dispatch from the thermal plants - in August and September, Brazil generated an average of 19 thousand MW of thermal energy, record values for the historical series, according to the National System Operator (ONS). This showed the imminent need for planning the contracting of thermoelectric plants, which have different purposes, either as reserve energy (preserving hydraulic reservoirs) or as capacity reserve (dispatch to cover system intermittence).

We therefore believe in the importance of thermal generation from natural gas, one of the few dispatchable energies with low emission of Greenhouse Gases (GHG), and throughout 2021, we participated in the auctions promoted - which featured natural gas as the leading role - by the Federal Government, to leverage our learning in this business model.



Financial **results**

7

After the negative impacts arising from the Covid-19 pandemic, with the recovery of economic activity in all segments where Comgás operates, our biggest operating asset, we continued in 2021 with an increasing trajectory of financial results, advancing in the execution of our expansion plan and ensuring the supply of natural gas to our more than 2.2 million customers.

Year-to-date, we recorded adjusted Ebitda of R\$2,707 million and adjusted net income of R\$1,775 million, increases of 24% and 88%, respectively, compared to 2020.

In the period, we carried out our second round of capital increase, through a private transaction for the subscription of new shares. Together with the first round, we raised R\$ 2,250 million. Investments performed amounted to R\$ 1,432 million, of which R\$ 1,175 million was allocated to Comgás operations and the remainder directed mainly to the São Paulo Liquefied Natural Gas Regasification Terminal (TRSP). [GRI 102-10](#)

As of December 31, 2021, our net indebtedness was R\$1,981 million, with 70% of long-term financing. Financial leverage, measured by the ratio between net debt and Ebitda, was 0.75 times.

Our direct economic value generated in 2021 was R\$ 16.26 billion, an increase of 41% compared to R\$ 11.47 billion recorded in 2020.

[GRI 102-7 | 201-1](#)

Economic and financial performance (R\$ thousand)			
	2020	2021	2021 x 2020 (%)
Net Revenue	9,093,170	12,330,209	36
Gross Profit	2,658,980	3,129,985	18
Ebitda	2,184,264	2,532,886	16
Adjusted Ebitda ¹	2,188,829	2,707,047	24
Net Profit	940,465	1,742,636	85
Adjusted Net Income ¹	943,478	1,775,207	88
Investments	1,012,456	1,432,275	41
Net Debt	3,535,166	1,980,974	-44
Leverage (Net Debt/Ebitda LTM ²)	1,62x	0,75x	-57

¹ Adjusted Ebitda and net income in order to maintain a normalized basis of comparison. Adjust to consider: Comgás regulatory current account and extraordinary events.

² Ebitda LTM refers to the Ebitda accumulated in the last 12 months, adjusted only by the Regulatory Current Account at Comgás.

Direct economic value generated (in thousand R\$) GRI 201-1			
	2019	2020	2021
Revenue	R\$ 12,172,514	R\$ 11,479,409	R\$ 16,268,299

Economic value distributed (in thousand R\$) GRI 201-1			
	2019	2020	2021
Operational costs	R\$ 8,237,880	R\$ 7,826,185	R\$ 11,558,902
Purchases of goods and services	R\$ 241,805	R\$ 219,775	R\$ 262,045
Employee salaries and benefits	R\$ 194,641	R\$ 161,629	R\$ 205,701
Payments to capital providers	R\$ 1,739,911	R\$ 1,390,516	R\$ 2,529,696
Tax payments	R\$ 1,420,008	R\$ 1,380,590	R\$ 1,151,961
Total	R\$ 11,834,245	R\$ 10,978,695	R\$ 15,708,305



Corporate **governance**

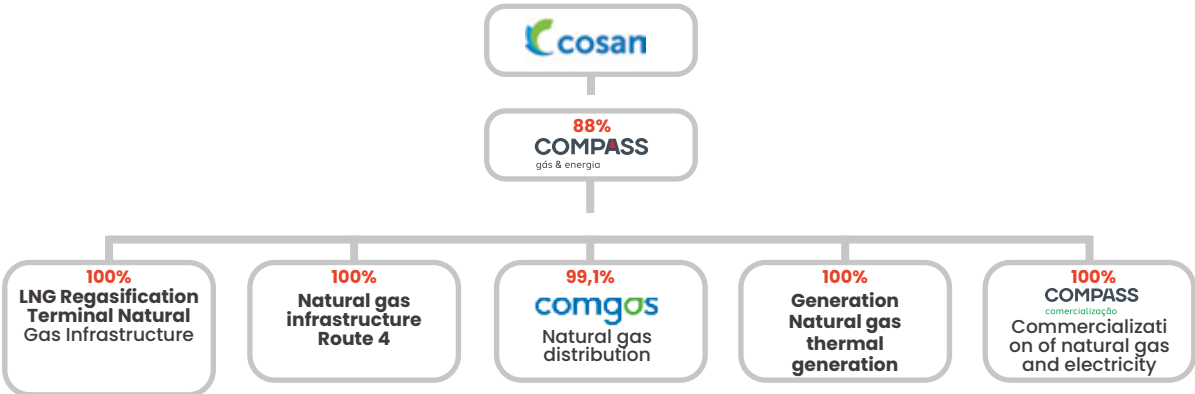
GRI 103-2 | 103-3

8

We are a joint stock company, controlled by Cosan S.A. and listed in the Basic Segment of B3 - Brasil, Bolsa, Balcão under the tickers PASS3, PASS5 and PASS6. Since our incorporation, we have adopted corporate governance practices in line with the highest standards of the Brazilian stock exchange, which go beyond the requirements of our listing segment. Among the differences are: [GRI 102-5](#)

- Segregation of duties between the chairman of the Board of Directors (BD) and the Chief Executive Officer. [GRI 102-23](#)
- Maintenance of the Statutory Audit Committee and Related Parties Committee.
- Compliance Program, with an Ethics Channel and public policies related to the topic.
- Risk Management, Compliance and Remuneration Policies, among others, approved by the Board of Directors.
- BD composed of at least 20% independent members. There is also a member representing employees on the Board of Directors of Comgás, under the terms of its Articles of Incorporation and the Corporate Law. In addition to diversity, the composition of the BDs considers previous experience as a director or executive and knowledge of finance and accounting, topics regarding national and international markets, corporate governance, compliance, internal controls, risk and people management.. [GRI 102-24](#)
- Periodic and individual assessment of directors, based on sustainability goals (health, safety of people and operations and the environment) and financial, projects, behavioral and attitudinal elements, as well as the commitment to the formation of succession and people development, aligned with the guidelines defined by the People Committee, and adherence to the commitments with sustainable development approved by the Board of Directors. [GRI 102-28](#)

Societal structure



Governance structure

GRI 102-18 | 102-22 | 102-26

We maintain governance structures and practices in line with market requirements and through which business objectives, corporate strategies and risk management mechanisms are established and communicated with transparency. Decisions on economic, environmental, and social issues are taken by the Executive Board and the Board of Directors.

Our highest decision-making body is the General Meeting of Shareholders and our administrative structure is composed of the Board of Directors (BD), the Executive Board and auxiliary and support bodies, such as the Audit (statutory); People; Strategic; Socio-environmental and Governance; Financial; Disclosure; Related Parties committees; and Fiscal Council, at Comgás. The actions of these bodies are governed by the provisions of our **Articles of Incorporation** and internal regulations. The CVs with the qualifications of the members are available on our **Investor Relations** website.

Compensation of executives

GRI 102-35

Our Remuneration Policy - in line with the strategic objectives, focused on the continuity of our business and on the creation of long-term value - establishes objectives, guidelines and rules that must be observed and applied for the remuneration of the statutory elected members of the Board of Directors, Statutory Board, Fiscal Council and Statutory Committee.

The members of the Board of Directors are entitled to a fixed remuneration, consisting of 12 monthly installments, the amount of which is determined based on their responsibilities, competences, their time dedicated to the functions performed and their services in the market. The remuneration of the Board of Directors thus reflects market practices, verified through periodic remuneration surveys performed by specialized consultants.

The compensation of the Statutory Board is composed of fixed and variable short- and long-term elements. The fixed element is determined according to the complexity and level of responsibility of the functions performed and market practice. In short-term variable compensation, to ensure differentiation and meritocracy, individual performance indicators are also taken into account, partly behavioral, and partly linked to financial, project and ESG goals. In turn, the payment of long-term variable compensation takes into account the individual performance of those eligible and our long-term performance..

Ethics and compliance

GRI 102-16 | 103-2 | 103-3

Our operations and those of our subsidiaries are guided by transparency, ethics and integrity - values driven by the Compliance Program, which establishes policies and procedures related to topics such as anti-corruption, conflict of interest, transactions between related parties, dialogue with the Government, respect for diversity and appreciation of human rights, among others. We chose as a guideline “doing the right thing, even when no one is looking”, which is provided for in the determinations of our Code of Conduct, reissued in 2020 and applicable to all employees and contractors.

Values and principles of the Code of Conduct



Agility and discipline: Agility in decision making, honoring safety, diligence and compliance with the internal processes and rules.



Innovation and inclusion: new ideas and the relentless search for creative solutions, privileging teamwork and valuing the diversity of Our People and their experiences.



Overcoming and excellence: Constantly overcoming challenges and seeking a better performance every day, in an ethical and sustainable way.



Respect: respect for the individuality, dignity, privacy, fundamental rights and freedom of Our People, so that we can have a work environment free from any type of discrimination, prejudice, violence and harassment, whether moral or sexual.



Integrity and ethics: integrity of our conduct and corporate processes in compliance with legal norms, contractual rules and corporate practices and the repudiation of fraudulent practices, acts of corruption and illegal conduct.



Diversity: respect and recognition of the value that comes from the sum of cultural differences, origin, physical and mental abilities, ideas, color, ethnicity, religion, sexual orientation, economic class, gender, and academic background.



Personal development: training, instruction, and recognition of Our People and focus on the development of each professional so that they increasingly excel.



Health and safety: Performance of our activities with respect to applicable labor and safety laws. We ensure everyone a healthy and inspiring work environment that values health and safety..



Sustainability: socio-environmental responsibility, through the protection of natural resources, attitudes seeking the continuity of the business and the creation of value for the community.

We operate with transparency, ethics and integrity

Under this focus, we also provide guidance to the teams to prevent situations that constitute a conflict of interest, a topic addressed in a specific section of our Code, in the Related Parties and Conflict of Interest Policy and in training and communications. The determination is that employees report possible conflicts of interest in an electronic form, with evaluation by the immediate manager and our Compliance, Legal and Internal Controls teams, which approve or disapprove the conflicting transaction, justifying their decisions. Additionally, through the Conecta platform, they must annually fill in a form declaring the existence or absence of a conflict of interest. GRI 102-25

Issues of ethics and conduct are jointly led by the Corporate Legal Compliance and Internal Audit, Risks and Compliance areas, subordinated to the Financial Board, the Audit Committee and the BD. These teams are available to clarify any doubts about our policies, our documents, and applicable legislation. Concerns and suspicions of ethical and legal violations (such as inappropriate conduct, discrimination, questionable accounting practice, violation of internal controls, auditing, laws or our Code) must be reported through the Ethics Channel, accessible by telephone (0800-725-0039) or online. The complaints, identified or anonymous, are received and managed by an independent and specialized company, which guarantees absolute confidentiality of the information and makes the appropriate referral for treatment, without any type of damage or retaliation to the complainant. GRI 102-17

Complaints received by the Ethics Channel GRI 102-17

	2019	2020	2021 ¹
Total number of complaints received	106	62	82
Percentage of complaints answered	100%	100%	100%

1. The main types of complaints were related to deviant behavior, tampering with the Gas Meter/Gas Diversion, moral harassment and/or physical aggression, and non-compliance with internal procedures and policies.

Risk management

GRI 102-15 | 102-30

Ensuring the management and rapid response to risks that could affect our business, our reputation, and our relationships is the responsibility of all teams. To do so, employees work with the guidance of processes and tools - such as the international model defined by ISO 31000 and COSO 2017 - and our Risk Management Policy, which aims to identify, assess and monitor, through mapping and risk assessment and identification of opportunities, to support the achievement of our business objectives.

There is also the support of dedicated instances, such as Internal Controls; Health, Safety and Environment (HSE); Crisis Management; and Risk Management. These areas work in an integrated manner, also involving the board responsible for the process in which the risk was identified, with sophisticated operating systems and specific security resources for risk mitigation, assessing the degree of impact and the probability of occurrence.

Through the Executive Board and the BD, our senior management is also engaged in monitoring and assessing risks, as well as establishing mitigation and correction actions. All mapped risks are taken to the Audit Committee and Risk Committee for discussion and knowledge, which act to assist in the specific treatment.

The main risks for which we seek protection are:

- **Strategic Risks**, associated with senior management's decision-making, which may generate a substantial loss in our value. In addition, they may have a negative impact on our revenue or capital as a result of poor planning, adverse decision-making and changes in our business environment.
- **Operational Risks**, related to the possibility of losses (of production, assets, customers, revenues) resulting from failures, deficiencies or inadequacy of internal processes, people and systems, as well as external events, such as natural disasters, fraud, strikes and acts terrorists. Operational risks generally lead to a reduction, degradation, or interruption, in whole or in part, of activities, with a negative impact on our reputation, in addition to the potential generation of contractual, regulatory, and environmental liabilities.
- **Market/Financial Risks**, configured by volume declines linked to industrial activity, which brings great challenges to the company's economic balance, and exposure of our financial operations and segregated into:
 - ▶ **EXCHANGE RATE**: associated with market volatility and which may affect us when there are assets or liabilities linked to foreign currency.
 - ▶ **INTEREST**: it is also associated with market volatility. From time to time, we may contract debt and derivatives indexed to fixed or floating interest rates, however, changes in the perception of risk by market agents may generate volatility in the interest curves and, thus, increase our financial expenses.
 - ▶ **LIQUIDITY**: situation in which we encounter difficulties in meeting the obligations associated with our financial liabilities.
 - ▶ **CREDIT**: associated with counterparties that may eventually fail to honor their commitments and obligations.

We guarantee risk
management and
rapid response

- **Compliance Risks:** associated with exposure to non-compliance with laws and regulations issued by central and local governments, as well as regulations issued by regulatory bodies or even internal in nature. They are associated with money laundering prevention and integrity, among others.
- **Regulation Risk:** as we operate in the regulated distribution market, the risk is associated with performing activities that do not meet the requirements of our concession agreement.
- **Technology Risk:** in the constant evolution of technology and the exponential growth of its use in our operations, we depend on information technology systems for the qualified continuity of activities.
- **Environmental Risks:** associated with the environmental impacts generated by the operations and mitigated with governance and commitment to comply with the applicable laws.
- **Occupational Safety Risks:** related to accidents in our own and contractors' workforce. To mitigate this risk, various actions are implemented to reduce the accident rate in operations and activities, including the provision of periodic training for all employees and investment in better safety systems, among others.

The identification of social, environmental and economic risks and impacts occurs during the **materiality process**, in which we consult customers, regulatory agencies, federal, state and municipal governments, financial institutions, investors, associations, and contractors. The responses highlighted which environmental, social, and economic topics, impacts, and risks are most relevant from the perspective of these audiences, prioritized according to the perceptions of our senior management and the sustainable development strategy of our businesses. [GRI 102-29](#)

Climate changes

GRI 201-2

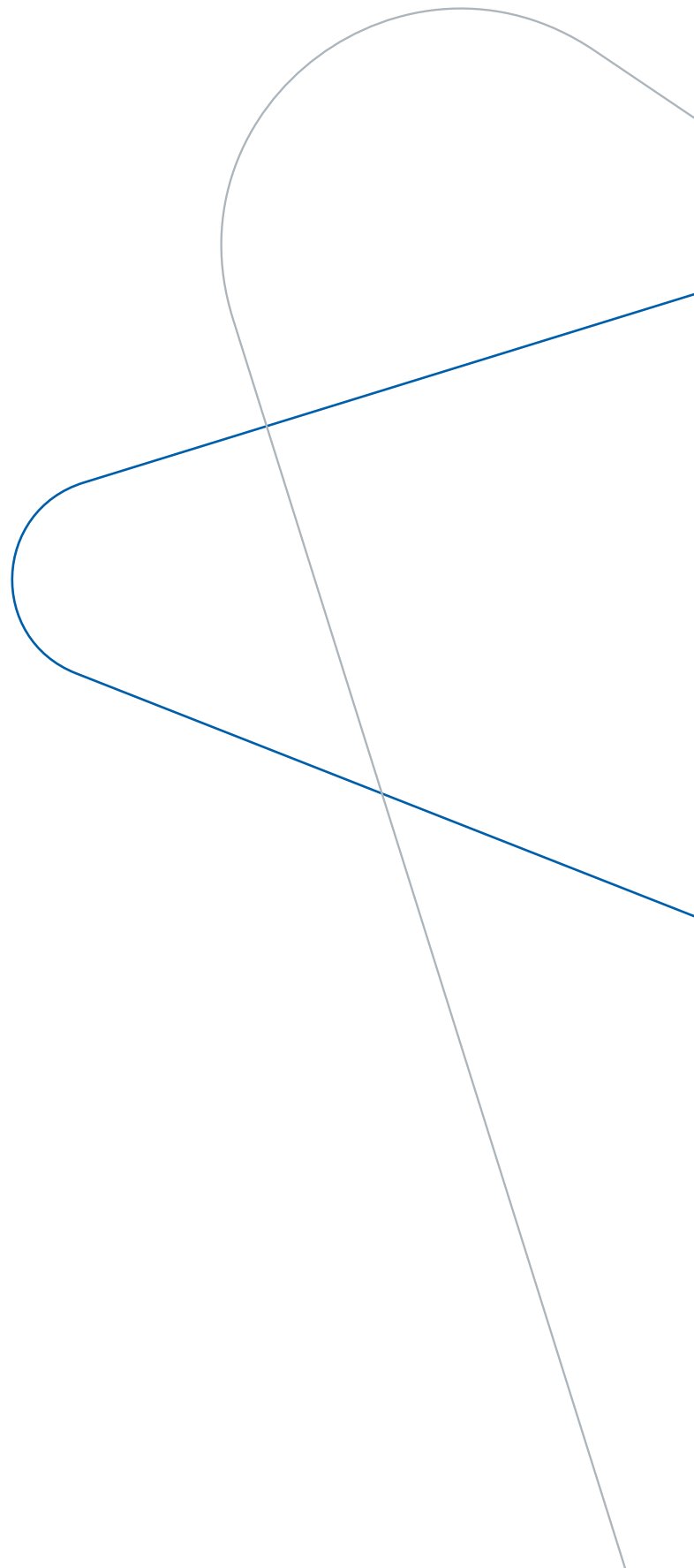
We recognize the importance of the climate change agenda, in which actions to mitigate and adapt impacts are essential. Thus, throughout 2022, we will conduct a study to improve and generate more visibility about our climate risk matrix, contemplating both physical and transition risks, to add to the matrix traditionally carried out by the Risk Management structure. In addition, this work also provides for the mapping of opportunities in the business. Among the risks currently mapped, we highlight the risks linked to reputation and the market.

Market risks

In the infrastructure and energy generation segment, there are investments in expanding the supply of natural gas to the market, as well as in projects that bring security and stability to the electrical system. Natural gas can be used to replace fuels with higher levels of GHG emissions, such as diesel, fuel oil and Liquefied Petroleum Gas (LPG), whether in electric generation, industrial use, commercial, and residential consumption or transportation. In addition, based on the flexibility provided by liquefied natural gas import terminals, it is possible to meet the growing demand for energy and reserve capacity, which aim to bring greater stability and security to an increasingly renewable matrix, being the complement for the intermittence of sources such as wind, solar, and hydraulic power.

In addition, gas-fired thermoelectric plants take up little space and can be installed close to consumption centers, reducing electrical transmission losses and avoiding waste with the possibility of integration with industrial processes (cogeneration).

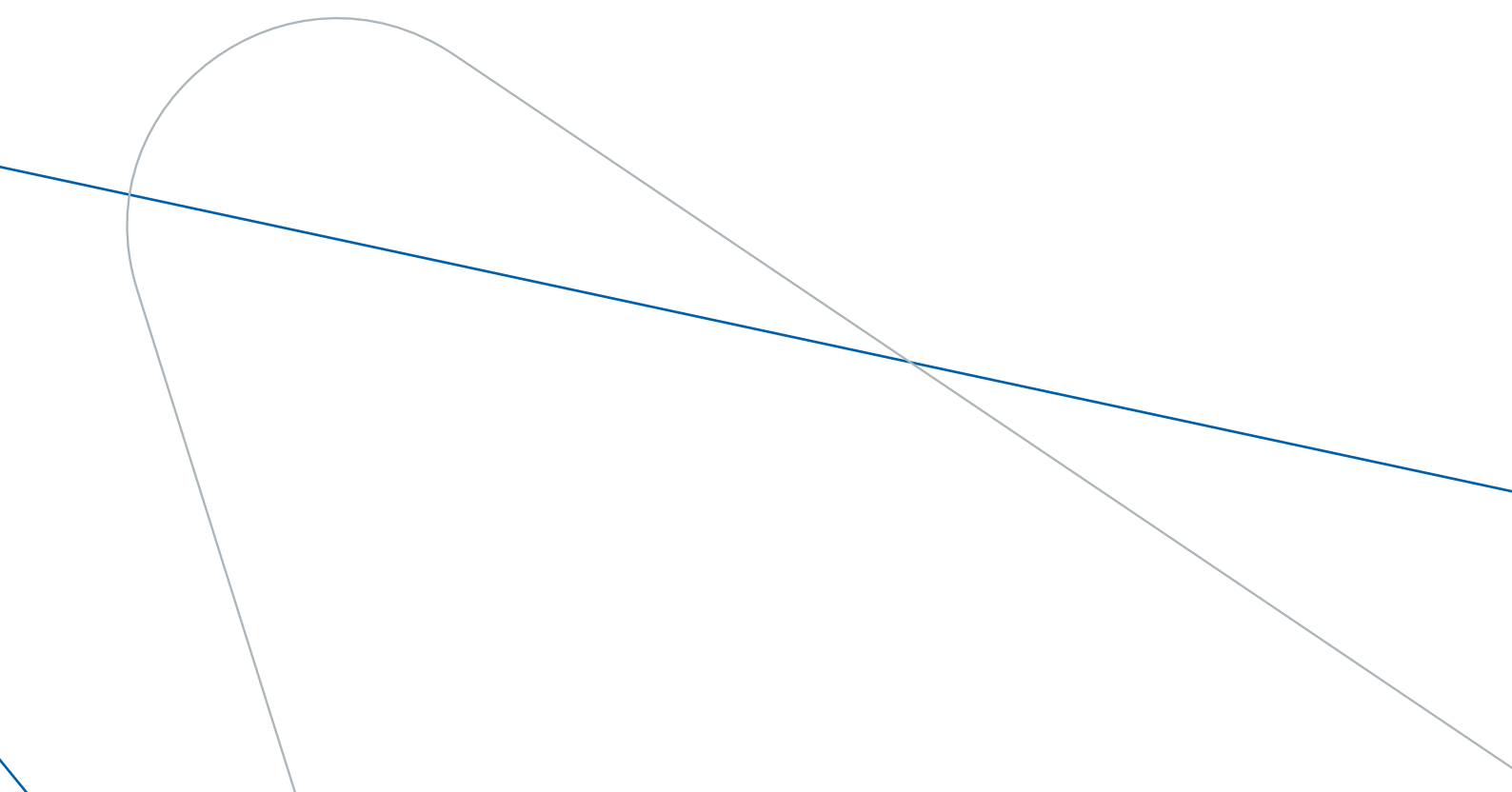
Therefore, to ensure that the Brazilian energy matrix continues to present a high share of renewable sources, it is necessary to continue investments in natural-gas fueled thermoelectric plants to provide systemic security to the energy grid.



Market opportunity

We envision the opportunity to expand our natural gas distribution area of operation, boosting the development of Brazil's infrastructure, with access to new markets (captive and free). In 2021, our portfolio counted on the expertise of Comgás - a model company of efficiency in Brazil, with operations and best practices replicable to other distributors.

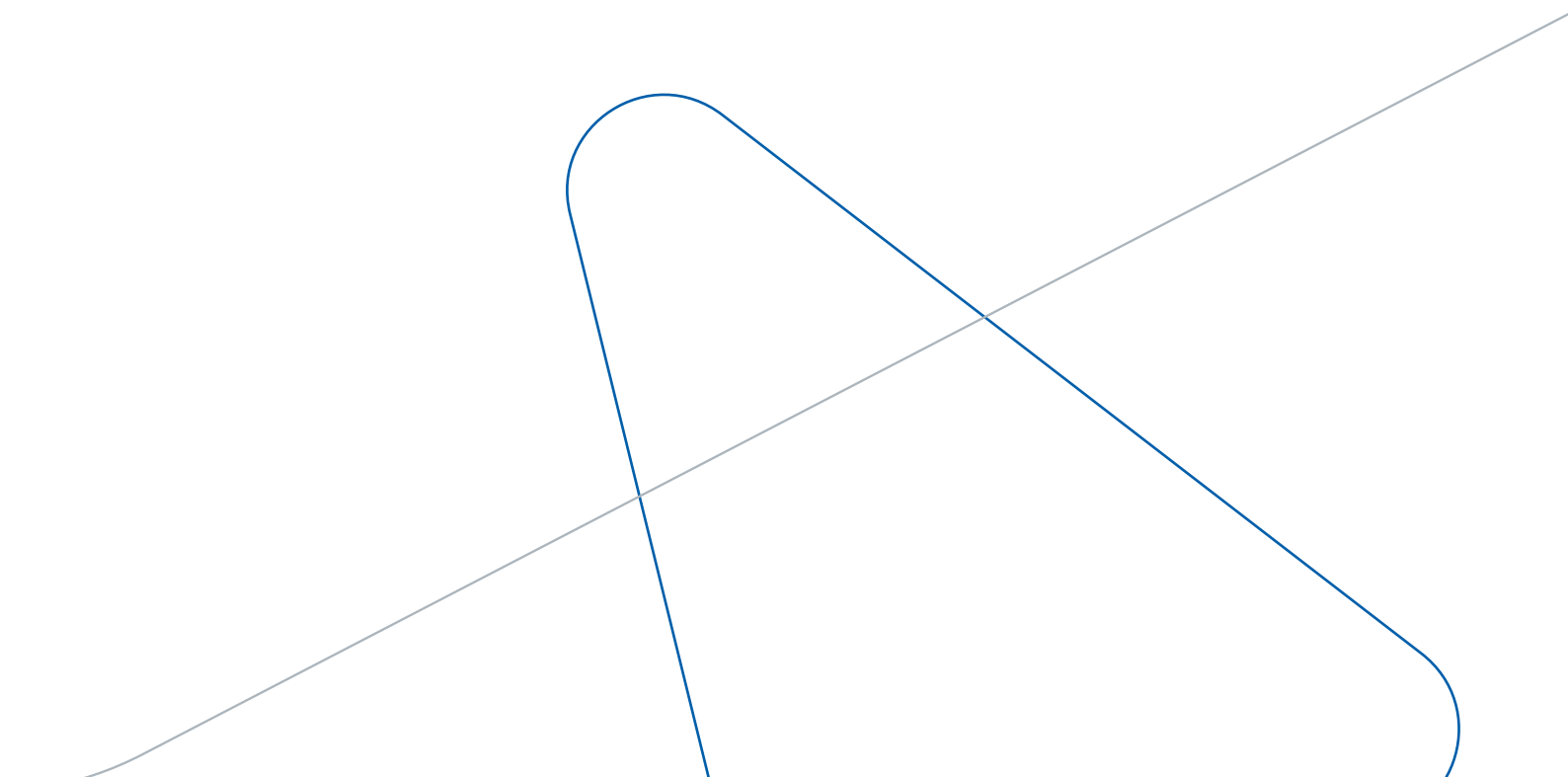
In one of our strategic sustainability pillars, the Flag of "Offer more energy with fewer emissions", we will contribute to the reduction of GHG emissions by replacing more polluting fuels with natural gas, and by including renewable gas in the distributor's supply portfolio or commercialization contracts. For new markets, we have the example of promoting biogas and biomethane for industrial and road use, in addition to expanding piped natural gas infrastructure to reach markets previously not served by the input.



Reputation risks

We have a strong commitment to the assets and employees safety of operations. Our business has the potential risk of damage to Comgás' pipeline network, caused by third parties, which could negatively impact the company's reputation in the market in the event of an accident involving natural gas leakage into the atmosphere. We assess not only the impact on the environment with the increase in Scope 1 emissions, but also on the safety of local communities. To mitigate this risk with a potential impact on reputation, Comgás has an Emergency Plan that provides for quick, efficient, and organized measures to minimize damages and losses that may be incurred to property, the community and the environment, and for a quick resumption of operations. The plan also defines mechanisms for interaction with state and municipal authorities, as well as with natural gas transporters, for the adoption of appropriate emergency control measures. We also regularly conduct emergency response examinations, for which we invite representatives from external bodies, including the Regulatory Agency of Public Services of the State of São Paulo (Arseps), to monitor our controls.

In addition, Comgás has a program called the Accident Prevention Plan, which aims to provide information and awareness of prior actions when a third party will perform a work in places close to the gas pipeline. The entire Comgás gas pipeline network (over 20,000 kilometers) is also monitored 24 hours a day by an Operational Control Center (CCO), with immediate action in case of leaks and incidents. To complement this remote and continuous monitoring, we use vehicles specialized in the detection of small leaks, which circulate at night along the route of the distribution network to identify any type of natural gas leak in the Comgás network. Finally, aiming at operational safety and the elimination of leaks, in 2019 we concluded the substitution of the cast iron network for polyethylene ducts.



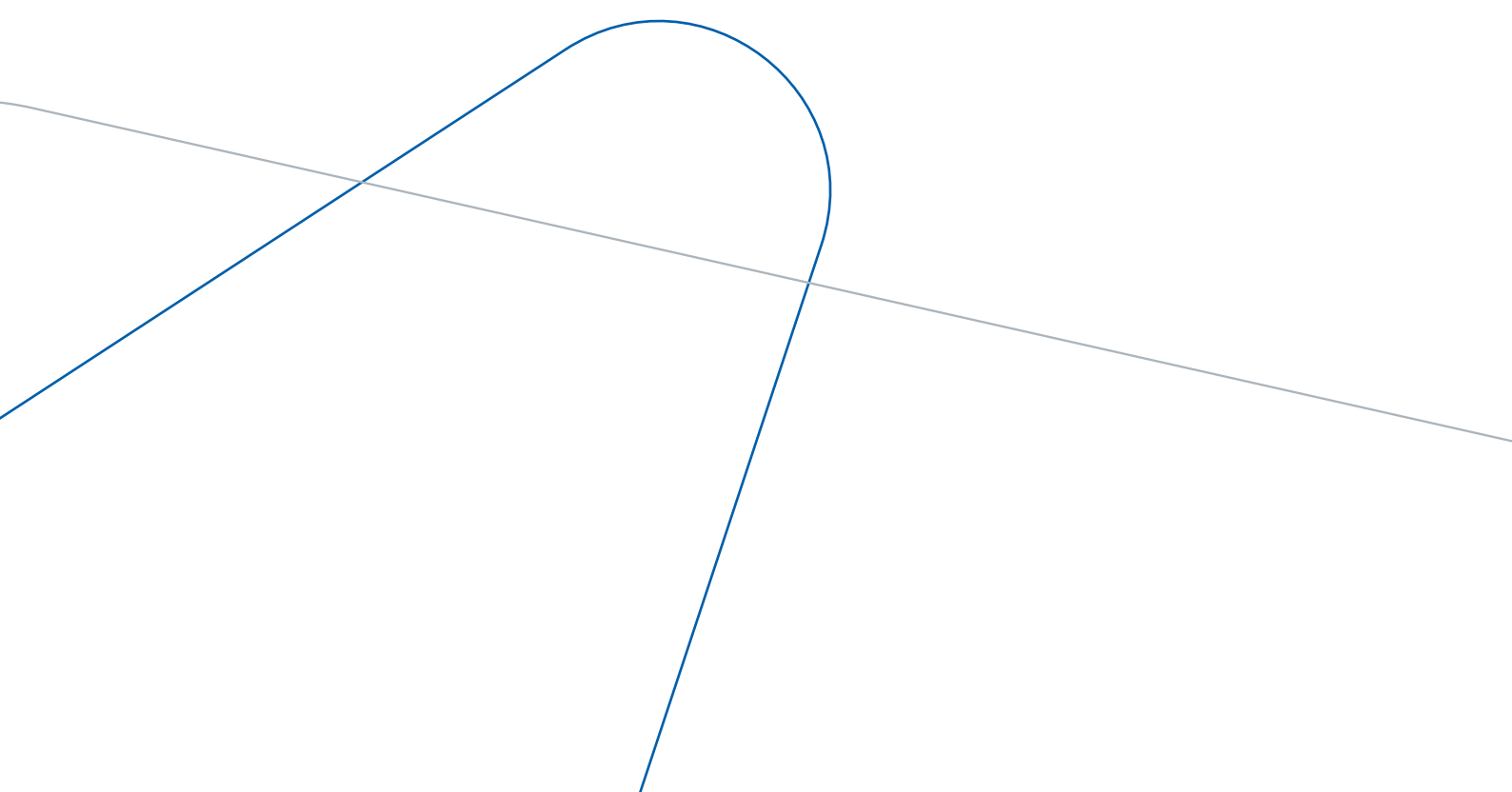
Opportunity for products and services

With a business focused on the development of the natural gas sector, we have the opportunity to reach new markets as the input replaces other energy sources that are more GHG-emitting.

With a relatively clean burning, in addition to emitting less GHG, the combustion of natural gas is also advantageous compared to other fossil fuels in terms of local air quality, virtually eliminating sulfur oxide, black carbon, and particulate material emissions into the atmosphere. The opportunities related to climate risks appear to the extent that natural gas can be used as energy to replace more polluting fuels and combined with industrial processes that consume heat, significantly increasing energy efficiency and reducing total emissions (cogeneration).

In energy generation, we are convinced of the need to increase the capacity of thermoelectric generation using natural gas in the Brazilian electricity matrix to maintain the country's energy security.

More information regarding risks and opportunities related to climate change is available in Topic C.2 - Risks and Opportunities - of the Carbon Disclosure Project (CDP) [climate change report](#).



Fight against corruption

GRI 205-1 | 205-3

We evaluate 100% of our operations and monitor all our financial transactions to identify risks of corruption, such as improper, unapproved, and/or duplicate payments to unregistered third parties and/or with altered amounts. To minimize these risks, all financial outputs follow a systemic flow, with supervision by the Internal Controls area, effectiveness tests and in-house and third-party audits, in compliance with the Sarbanes-Oxley Act (SOx).

To ensure an adequate result in the fight against corruption, our Compliance area also adopts robust processes, guided by due diligence policies and procedures (a process that involves the study, analysis, and detailed assessment of information from a third party). Thus, we act in compliance with determinations such as those of the Financial Control Council (Coaf), carefully evaluating situations involving Politically Exposed Persons (PEP) and always aiming to comply with the Money Laundering Prevention Law (PLD). Additionally, we offer mandatory training on the subject and continue to follow our Code of Ethics and Conduct, which guides all employees and third parties to make the correct decisions on a daily basis. With this framework, we have not recorded any case of corruption in our operations.

Operations subject to risk assessments related to corruption GRI 205-1

	2019	2020	2021
Total number of operations subject to risk assessments related to corruption	61,667	43,723	58,106
Percentage of operations subject to risk assessments related to corruption	100%	100%	100%

Awareness and training GRI 205-2

In 2021, 87% of Comgás employees were trained in anti-corruption policies and procedures. At Compass, 39.4% of professionals were also trained on the subject. The communication of our anti-corruption policies and procedures was performed to 93% of Comgás' business partners.

In line with our ethical precepts and to guide our employees, we held two online compliance workshops at Comgás, within the scope of the Integrity Program. The events addressed the relevance of the topic at all stages of our business, with tangible explanations for all areas and practical day-to-day issues related to internal controls, best practices, and governance. On occasions, we also reinforce our repudiation of any type of harassment, reinforcing that being in compliance also means "respect" for our people and their stories. In this sense, employees also gave testimonies, demonstrating the strength of our culture, which advocates "always do the right thing".

Performance
indicators

9

Our team

Number of employees by contract type and gender¹ GRI 102-8

	2019			2020			2021		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Determined time	67	17	84	13	16	29	15	11	26
Undetermined time	802	339	1,141	822	344	1,166	776	369	1,145
Total	869	356	1,225	835	360	1,195	791	380	1,171

1. Data considers active and retired employees. Data for 2019 only include Comgás.

Number of employees by age group¹ GRI 102-8

	2019	2020	2021
Under 30 years	284	249	216
Between 30 and 50 years	871	868	859
Over 50 years	70	78	96
Total	1,225	1,195	1,171

1. Data considers active and retired employees. Data for 2019 only include Comgás.

Number of employees by functional category¹ GRI 102-8

	2019	2020	2021
Board	8	17	19
Management	54	65	82
Coordination	44	53	50
Administrative	650	637	649
Operational	455	414	360
Trainees	14	9	11
Total	1,225	1,195	1,171

1. Data considers active and retired employees. Data for 2019 only include Comgás.

Variation between the lowest wage paid by the organization and the local minimum salary, by gender ¹ GRI 202-1						
	2019		2020		2021	
	Men	Women	Men	Women	Men	Women
Lowest wage paid by the organization	1,662.8	1,662.8	1,710.09	1,710.09	1,830.71	1,830.71
Minimum wage determined by legislation or union	1,662.8	1,662.8	1,694.16	1,694.16	1,830.71	1,830.71
Percentage Ratio	100%	100%	101%	101%	100%	100%

1. The minimum wage considered as the minimum wage for employees is defined in the collective agreement with the union and does not vary by gender or location. In 2021, the lowest wage paid by the organization was equivalent to 100% of the Brazilian minimum wage.

Total number and rate of new hires, by age group ¹ GRI 401-1						
	2019		2020		2021	
	Total	Rate	Total	Rate	Total	Rate
Under 30 years	229	0.81	49	0.20	45	0.21
Between 30 and 50 years	237	0.27	82	0.09	106	0.12
Over 50 years	0	0.00	3	0.04	7	0.07
Total	466	0.38	134	0.11	158	0.13

1. Data from 2020 onwards cover all Compass operations. The new hire rate is calculated as follows: Number of hired persons / Number of employees in the category in December of each year. All employees were hired in the Southeast Region.

Total number and rate of new hires, by gender ¹ GRI 401-1						
	2019		2020		2021	
	Total	Rate	Total	Rate	Total	Rate
Men	155	0.18	77	0.09	78	0.10
Women	311	0.87	57	0.16	80	0.21
Total	466	0.38	134	0.11	158	0.13

1. Data from 2020 onwards cover all Compass operations. The new hire rate is calculated as follows: Number of hired persons / Number of employees in the category in December of each year. All employees were hired in the Southeast Region.

Total number and rate of turnover, by age group¹ GRI 401-1

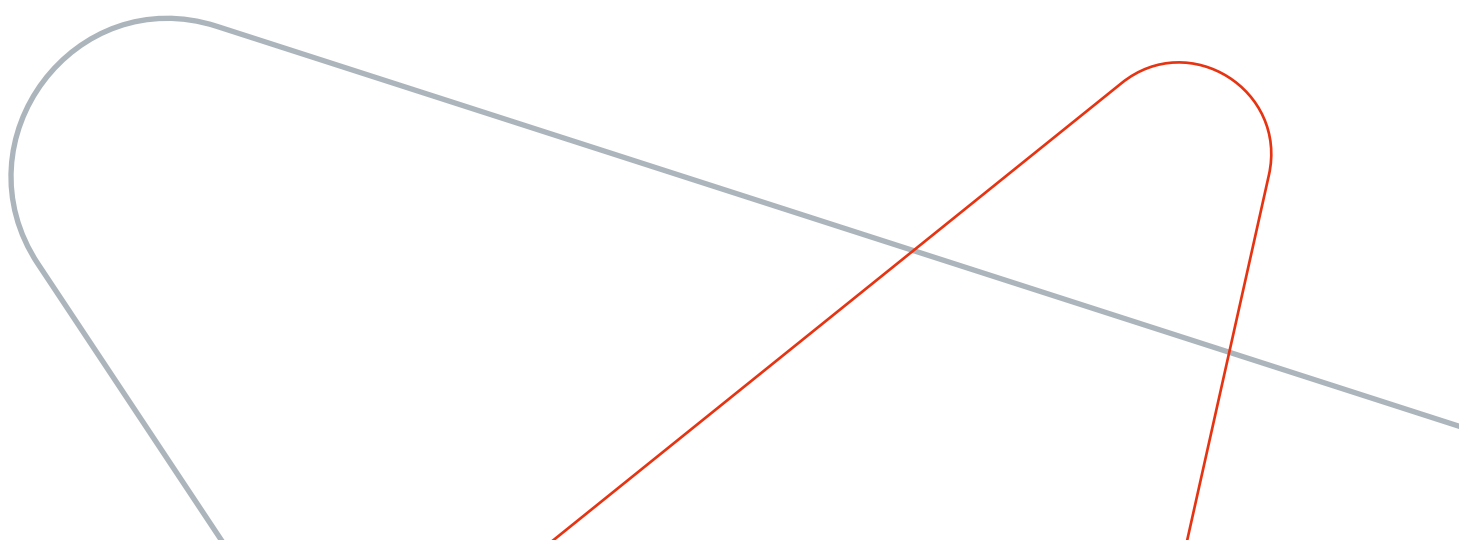
	2019		2020		2021	
	Total	Rate	Total	Rate	Total	Rate
Under 30 years	104	0.37	65	0.26	41	0.19
Between 30 and 50 years	150	0.17	141	0.16	136	0.16
Over 50 years	25	0.36	6	0.08	20	0.21
Total	279	0.23	212	0.18	197	0.17

1. Data from 2020 onwards cover all Compass operations. The turnover rate is calculated as follows: Number of fired employees / Number of employees in the category in December of each year. All employees were dismissed in the Southeast Region.

Total number and rate of turnover, by gender¹ GRI 401-1

	2019		2020		2021	
	Total	Rate	Total	Rate	Total	Rate
Men	154	0.18	135	0.16	132	0.17
Women	125	0.35	77	0.21	65	0.17
Total	279	0,23	212	0,18	197	0,17

1. Data from 2020 onwards cover all Compass operations. The turnover rate is calculated as follows: Number of fired employees / Number of employees in the category in December of each year. All employees were dismissed in the Southeast Region.



Maternity and paternity leave¹ GRI 401-3

		2019	2020	2021
Total number of employees who took maternity/paternity leave in the period	men	29	7	9
	women	14	19	13
Total number of employees who took maternity/paternity leave within the financial year and returned to work within the financial year after the end of the leave	men	28	7	9
	women	3	8	5
Total number of employees who left the previous year and returned to work in the year after the end of maternity/paternity leave	men	0	1	0
	women	7	9	9
Total number of employees who returned to work after maternity/paternity leave and who remained with the company 12 months after returning to work	men	19	22	4
	women	5	7	13
Return rate	men	100%	100%	100%
	women	70%	86%	89%
Retention rate	men	83%	79%	63%
	women	71%	70%	76%

1. The 2019 and 2020 data were revised because Compass started to report the data in a way that makes more sense to management, explained below. Rates are calculated as follows: Return rate = total number of employees who returned from leave in the period + total number of employees who returned in the following year / total number of employees who left in the period. Retention rate = total number of employees who were still employed 12 months after returning from leave / total number of employees who returned from leave in the period + total number of employees who returned in the following year.

Occupational accidents GRI 403-9

Employees' health and safety rates and numbers ¹	2019	2020		2021	
		Comgás	Compass	Comgás	Compass
Number of deaths as a result of work-related injuries	0	0	0	0	0
Death rate as a result of work-related injuries	0	0	0	0	0
Number of high-consequence work-related injuries (excluding deaths)	1	1	0	0	0
Rate of high-consequence work-related injuries (excluding deaths) - LTIF ²	0.35	0.35	0	0	0
Number of reportable work-related injuries	1	3	0	0	0
Total Reportable Case Frequency - TRCF ⁴	0.35	1.06	0	0	0
Motor vehicle incidents ⁵	39	53	0	38	0
Motor vehicle incident rate - MVIR ⁶	4.62	5.87	0	4.35	0

1. The 2019 data only include Comgás. For Comgás, 2,820,297 man-hours worked (HHT) and 8,446,011 kilometers traveled by motor vehicles were considered in 2019; 2,842,128 HHT and 9,036,568 kilometers traveled by motor vehicles in 2020; and 2,815,825 HHT and 8,746,324 kilometers covered by motor vehicles, in 2021. For Compass, 46,816 man hours worked (HHT) were considered in 2020; 171,564 man hours worked (HHT), in 2021.

2. The cause of the 2020 lost time was knee sprain.

3. Lost Time Injury Frequency (LTIF): number of work-related accidents with lost time per 1,000,000 hours worked..

4. Total Recordable Case Frequency (TRCF): number of work accidents with lost time or restricted work, per 1,000,000 hours worked. To calculate the total recordable case frequency (TRCF) we considered leave + restricted work.

5. The indicator is monitored only for own fleet.

6. Motor Vehicle Incident Rate (MVIR): number of motor vehicle incidents per 1,000,000 kilometers traveled..

Work accidents GRI 403-9					
Contractors' health and safety rates and numbers ¹	2019	2020		2021	
		Comgás	Compass	Comgás	Compass
Number of deaths as a result of work-related injuries	0	0	0	0	0
Death rate as a result of work-related injuries	0	0.00	0	0	0
Number of high-consequence work-related injuries (excluding deaths)	2	23	0	1	0
Rate of high-consequence work-related injuries (excluding deaths) - LTIF ²	0.25	0.24	0	0.13	0
Number of reportable work-related injuries	10	19	0	9	0
Total Recordable Case Frequency - TRCF ³	1.23	2.28	0	1.21	0

1. The 2019 data only include Comgás. For Comgás, 8,109,345 man-hours worked (HHT) were considered in 2019; 8,342,940 man-hours worked (HHT), in 2020; and 7,410,074 man hours worked (HHT) in 2021. For Compass, 3,696 man hours worked (HHT) were considered in 2020; 261,588 man hours worked (HHT), in 2021.
2. Lost Time Injury Frequency (LTIF): number of work-related accidents with lost time per 1,000,000 hours worked.
3. Total Recordable Case Frequency (TRCF): number of work accidents with lost time or restricted work, per 1,000,000 hours worked. To calculate the total recordable case frequency (TRCF) we considered leave + restricted work.

Health and safety rate for own and third-party employees (combined) GRI 403-9			
	2019 ¹	2020 ¹	2021
Number of deaths as a result of work-related injuries	0	0	0
Death rate as a result of work-related injuries	0	0	0
Number of high-consequence work-related injuries (excluding deaths)	3	3	1
Rate of high-consequence work-related injuries (excluding deaths) - LTIF ²	0.27	0.27	0.09
Number of reportable work-related injuries	11	22	9
Total Recordable Case Frequency - TRCF ³	1.00	1.97	0.83

1. The 2019 data only include Comgás. For Comgás, 10,931,344 man-hours worked (HHT) were considered in 2019; 11,185,068 man-hours worked (HHT), in 2020; and 10,225,899 man hours worked (HHT) in 2021. For Compass, 50,512 man hours worked (HHT) were considered in 2020; 433,152 man hours worked (HHT), in 2021.
2. Lost Time Injury Frequency (LTIF): number of work-related accidents with lost time per 1,000,000 hours worked.
3. Total Recordable Case Frequency (TRCF): number of work accidents with lost time or restricted work, per 1,000,000 hours worked. To calculate the total recordable case frequency (TRCF) we considered leave + restricted work.

Professional diseases GRI 403-10 GRI 403-10			
Numbers of employee health problems ¹	2019	2020	2021
Number of deaths as a result of work-related health problems	0	0	0
Number of reportable work-related illness cases	0	0	0
Absenteeism rate (casual absences, short-term disability, workers compensation) ²	0.50	0.49	0.57

1. The 2019 data only include Comgás.

2. In 2021, we had a slight increase in the indicator of absenteeism due to non-occupational illness in 2021, when compared to 2020 and 2019, mainly related to the increase in the number of people infected by Covid-19, particularly in the first quarter of the year (pattern found in national). Despite the increase in absenteeism, there was no transmission of the disease in the occupational environment, thanks to the measures implemented to mitigate risk: distribution of surgical masks and/or N95 to all Comgás employees and contractors, use of aprons and shoe covers among first-class gas workers service, distribution of gel alcohol for hand hygiene and 70% alcohol for cleaning materials and vehicles, training of the population on distancing and absence of physical contact, establishment of activity in home-office for administrative activities, vaccination control against Covid-19 and the outpatient's performance in the diagnosis, treatment, monitoring and early leave of work of all employees and their families infected by the virus or under suspicion of infection.

Hours of training by gender GRI 404-1						
	2019		2020		2021	
	Total amount of hours	Average per employee	Total amount of hours	Average per employee	Total amount of hours	Average per employee
Men	27,638.00	31.80	11,290.00	13.52	3,557.11	4.50
Women	13,216.00	37.12	5,002.00	13.89	2,817.08	7.41
Total	40,854.00	33.35	16,292.00	13.63	6,374.19	5.44

Hours of functional category training GRI 404-1						
	2019		2020		2021	
	Total amount of hours	Average per employee	Total amount of hours	Average per employee	Total amount of hours	Average per employee
Board					41.23	2.17
Management					1,477.52	18.02
Coordination					1,290.31	25.81
Administrative					2,700.62	4.16
Operational					646.52	1.80
Trainees					217.99	19.82
Total	40,854.00	33.35	16,292.00	13.63	6,374.19	5.44

Percentage of members within governance bodies, by gender [GRI 405-1](#)

Board of Directors		
2019	Men	100%
	Women	0%
2020	Men	86%
	Women	14%
2021	Men	92%
	Women	8%

Percentage of members within governance bodies, by age group [GRI 405-1](#)

Board of Directors		
2019	Under 30 years	0%
	Between 30 and 50 years	25%
	Over 50 years	75%
2020	Under 30 years	0%
	Between 30 and 50 years	43%
	Over 50 years	57%
2021	Under 30 years	0%
	Between 30 and 50 years	17%
	Over 50 years	83%

Percentage of employees, by employee category and gender¹ [GRI 405-1](#)

	2019			2020			2021		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Board	88%	13%	100%	82%	18%	100%	79%	21%	100%
Management	76%	24%	100%	75%	25%	100%	72%	28%	100%
Leadership/ coordination	66%	34%	100%	60%	40%	100%	52%	48%	100%
Administrative	55%	45%	100%	54%	46%	100%	54%	46%	100%
Operational	94%	6%	100%	94%	6%	100%	94%	6%	100%
Trainees	50%	50%	100%	67%	33%	100%	27%	73%	100%
Total	71%	29%	100%	70%	30%	100%	68%	32%	100%

1. 2019 data only include Comgás. Some 2020 data have been updated, after reviewing the calculations performed.

Percentage of employees, by employee category and age group¹ [GRI 405-1](#)

	2019			2020			2021		
	Under 30 years	Between 30 and 50 years	Over 50 years	Under 30 years	Between 30 and 50 years	Over 50 years	Under 30 years	Between 30 and 50 years	Over 50 years
Board	0%	63%	38%	0%	65%	35%	0%	63%	37%
Management	0%	78%	22%	5%	82%	14%	2%	83%	15%
Leadership/ coordination	0%	98%	2%	8%	89%	4%	4%	94%	2%
Administrative	29%	67%	3%	27%	69%	4%	24%	71%	5%
Operational	18%	75%	7%	15%	76%	9%	13%	75%	12%
Trainees	71%	29%	0%	67%	33%	0%	82%	18%	0%
Total	23%	71%	6%	21%	73%	7%	18%	73%	8%

1. 2019 data only include Comgás. Some 2020 data have been updated, after reviewing the calculations performed.

Percentage of black employees, by employee category and gender¹ GRI 405-1

	2021		
	Men	Women	Total
Board	0%	0%	0%
Management	3%	4%	4%
Leadership/coordination	12%	21%	16%
Administrative	15%	12%	14%
Operational	33%	17%	26%
Trainees	33%	25%	27%
Total	22%	13%	19%

1. Employees who declare themselves to be black or brown are considered black. Data by race began to be monitored from 2021.

Percentage of employees with disabilities (PwD), by employee category and gender¹ GRI 405-1

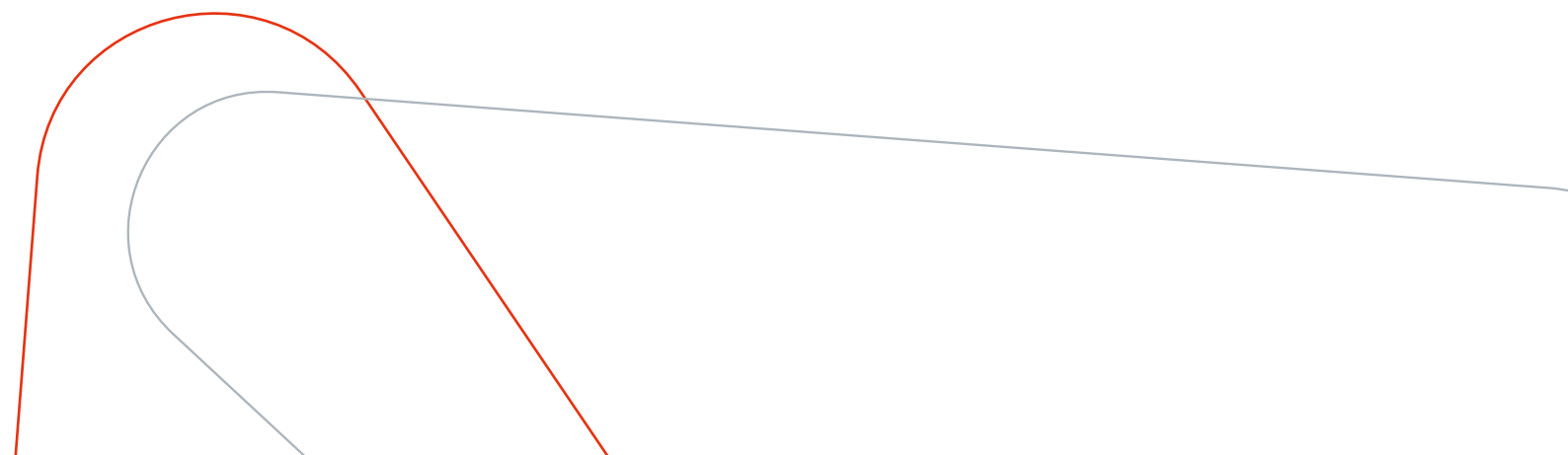
	2019			2020			2021		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Board	0%	0%	0%	0%	0%	0%	0%	0%	0%
Management	2%	0%	2%	2%	0%	2%	2%	0%	1%
Leadership/coordination	0%	0%	0%	0%	5%	2%	0%	4%	2%
Administrative	5%	4%	5%	5%	5%	5%	6%	6%	6%
Operational	1%	4%	2%	2%	8%	2%	2%	13%	3%
Trainees	0%	0%	0%	0%	0%	0%	0%	0%	0%
Total	3%	4%	3%	3%	5%	3%	4%	6%	4%

1. 2019 data only include Comgás. Some 2020 data have been updated, after reviewing the calculations performed.

Mathematical ratio between base salary and remuneration for women and men in each employee category¹ GRI 405-2

	2021	
	Base salary	Remuneration
Board	0.63	0.58
Management	0.97	0.96
Leadership/coordination	0.98	0.96
Administrative	0.91	0.89
Operational	0.95	0.84
Trainees	1.01	1.01

1. The data started to be monitored from 2021.



Fight against corruption

Total number of employees who were communicated to and who received training on anti-corruption policies and procedures - by employee category¹ GRI 205-2

	2019		2020		2021	
	Communicated to	Trained	Communicated to	Trained	Communicated to	Trained
Board	8	8	10	8	10	10
Management	54	46	52	51	59	47
Coordination	44	40	43	41	53	48
Administrative	650	612	609	595	636	582
Operational	455	436	414	409	355	281
Trainees	14	13	9	8	10	10
Total	1,225	1,155	1,137	1,112	1,123	978

1. The data only include Comgás operations. Compass does not monitor by job category - during the year, 26 employees were trained.

Total number of employees who were communicated to and who received training on anti-corruption policies and procedures - by employee category¹ GRI 205-2

	2019		2020		2021	
	Communicated to	Trained	Communicated to	Trained	Communicated to	Trained
Board	100%	100%	100%	80%	100%	100%
Management	100%	85%	100%	98%	100%	80%
Coordination	100%	91%	100%	95%	100%	91%
Administrative	100%	94%	100%	98%	100%	92%
Operational	100%	96%	100%	99%	100%	79%
Trainees	100%	93%	100%	89%	100%	100%
Total	100%	94%	100%	98%	100%	87%

1. In 2019 and 2020, only Comgás data were reported. Compass does not monitor by job category - during the year, 26 employees were trained.

Total number and percentage of business partners to whom the anti-corruption policies and procedures adopted by the organization were communicated¹ GRI 205-2

Communicated/Trained Business Partners	2019 ¹		2020		2021	
	Communicated to	Trained	Communicated to	Trained	Communicated to	Trained
Total number of communicated/trained partners	206	0	40	40	45	42
Percentage of communicated/trained partners	100%	0%	100%	100%	100%	93%

1. In 2019, we considered the number of contracts signed and the adoption of the integrity and anti-corruption clause contained in our standard clause and that indicates the compliance with our Code of Conduct and Integrity Policies and the anti-corruption law. In 2020, the effective performance of communication and training directly to the contractors was considered. For 2021, we consider as "communicated" all those who received material about the Comgás integrity program - contractors that participated in the Excellence Program, in addition to the contracts signed considering the standard Comgás integrity clause. The data only include Comgás operations.

Partnership with suppliers

Percentage of procurement budget spent on local suppliers GRI 204-1

	2019	2020	2021
Total amount of the budget for suppliers (R\$)	8,279,496,720.14	7,281,405,096.20	10,529,401,846.87
Total amount spent on local suppliers (R\$)	8,262,636,383.18	7,275,241,064.91	10,219,232,179.50
Percentage of budget spent on local suppliers	99.8%	99.9%	97.1%

Suppliers with negative environmental impacts¹ GRI 308-2

	2021
Number of suppliers evaluated for environmental impacts	2,058
Number of suppliers identified as having significant, actual and potential negative environmental impacts	12
Number of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed as a result of the evaluation	12
Percentage of suppliers identified as having significant, actual and potential negative environmental impacts, with which improvements were agreed as a result of the evaluation	100%
Number of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of the evaluation.	0
Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of the evaluation.	0%

1. In 2021, with the implementation of the Ariba system and the updating of the governance of the supplier approval system (Linkana), we will be able to actively monitor the situation of suppliers in terms of environmental aspects, especially regarding environmental embargoes and assessments carried out by Ibama.

Contribution to society

Participation in association [GRI 102-13](#)

Description	Purpose	Type of participation in governance bodies
Brazilian Association of Piped Gas Distributors (Abegás)	It brings together piped gas distribution concessionaires, shareholders and companies participating in the gas industry. The participation aims to expand the supply of natural gas; support the strengthening of distributors through exchange and technical cooperation; collaborate with government agencies in the formulation of development programs. Abegás represents Brazil at the International Gas Union (IGU).	Vice presidency
Union of the Energy Industry in the State of São Paulo (Sindienergia)	As the union brings together companies in the sector, including electricity and natural gas distributors, generators and transmitters, the function is to represent ours in the state's energy sector, promoting and increasing the participation of natural gas.	Vice presidency
Cogeneration Industry Association (Cogen)	Promote cogeneration; act to eliminate the "barriers" that still exist to make cogeneration projects viable; participate in the implementation of a model of diversification of the Energy Matrix with more efficient, cleaner and lower cost (ESG) solutions.	Board of Directors
Center of Industries of the State of São Paulo (Ciesp/Fiesp)	Influence on points related to the gas industry. Maintain institutional relationship. Participate in industry discussions and positioning in relation to natural gas, regulation, tariff revisions. Seek approximation with some customers and industry leaders.	Board
Brazilian Institute of Oil, Natural Gas and Biofuels (IBP)	Know the positioning of consultations and public hearings; regulatory discussions. Participate in technical committees, work on studies and proposals of a technical, regulatory and tax nature. Seek anticipation from Oil and Gas industry lobbies.	No direct participation in governance bodies
Brazilian Institute of Finance Executives (Ibef)	Participate in technical events that address topics relevant to the CFO's day-to-day life and the exchange of experiences among all participants.	No direct participation in governance bodies
American Gas Association (AGA)	Association representing companies working with natural gas. It has the participation of distributors, suppliers, equipment suppliers, among others. It operates in the United States, but also has companies from all over the world. Important in the ESG and security issues.	No direct participation in governance bodies
Brazilian Biogas Association (Abiogás)	Acting as a channel for dialogue with civil society, Federal and State Governments, municipalities and bodies responsible for Brazilian energy planning, Abiogás aims to transform electrical, fuel and thermal energy generated by biogas into widely available energy commodities. used, with a 10% stake in the Brazilian matrix.	No direct participation in governance bodies
Santos Commercial Association (ACS)	We participate in ACS as members of the Chamber of Oil, Gas and Energy, as well as using the entire infrastructure of the association for the benefit of Compass, such as: Meeting Rooms, STAF, contacts, auditoriums etc.	No direct participation in governance bodies

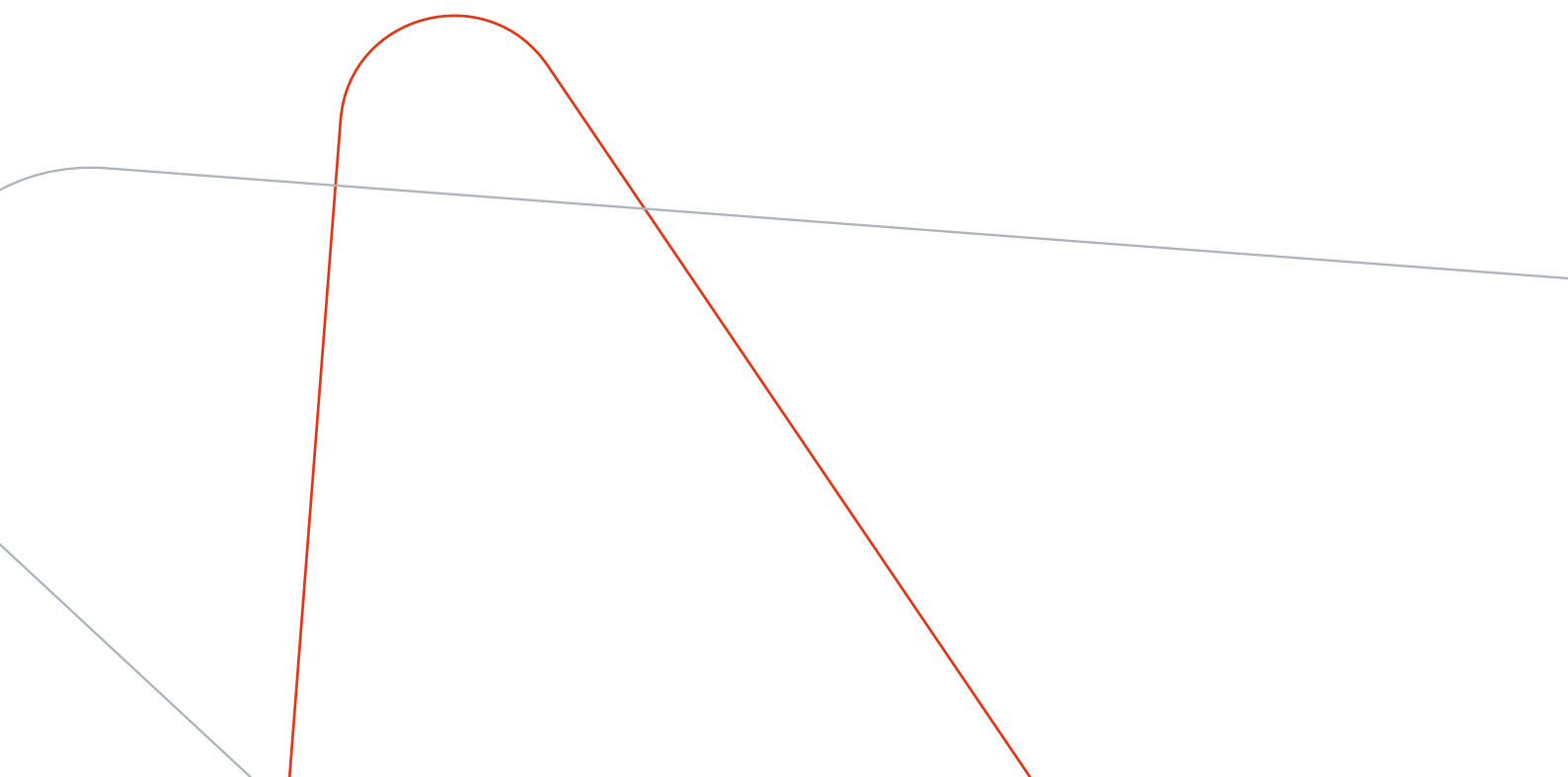
Description of significant indirect economic impacts TRSP GRI 203-2

Impacts	Description of the identified indirect economic impacts
Changes in the productivity of organizations, sectors or the economy as a whole	The Terminal's infrastructure is in line with the new Gas Law and aims to provide a new source of natural gas supply in order to make the offer more flexible, provide greater security for the supply of natural gas to the State and the Country, offer more competitive prices, offer transitional energy to mitigate emissions that contribute to the greenhouse effect.
Economic development in areas with high poverty rate	Make available new sources of natural gas supply in order to make the supply of fuel more flexible.
Economic impact of the improvement or deterioration of social or environmental conditions	Use of state-of-the-art technology and engineering resources, mitigating the environmental impact in the implementation phase, such as the use of a directional hole, reducing the affected areas and preserving areas of vegetation and permanent preservation areas. During the environmental licensing process, a possible impact on local fishing activity during the implementation of the TRSP was mapped. The aspect is being monitored during the implementation of the TRSP to verify the real impact and mitigating actions.
Availability of products and services for low-income people	Make available new sources of natural gas supply in order to make the supply of fuel more flexible, with increased municipal and state tax collection.
Strengthening the skills and knowledge of a professional community or in a geographic region	Facilitation of training and capacity building for the fishing community of Baixada Santista, training 36 fishermen in the POP (Professional Fisherman) course of the Brazilian Navy, contributing to these fishermen being able to receive government aid during the "closed" period.
Number of jobs offered in the supply or distribution chain	In the implementation of the TRSP, direct and indirect jobs were generated. There were direct jobs 353, being 264 from Baixada Santista.
Encouraging, enabling or restricting direct foreign investment	The implementation of the TRSP allowed contracts with foreign companies, stimulating new foreign investments in the country.
Economic impact of changes to the location of operations or activities	Implementation of the TRSP in Baixada Santista, generating municipal collections during the execution of the work and in the operational phase.
Economic impact of using products and services	During the implementation of the TRSP there is a demand for local services, stimulating the local economy as well as purchase of materials. After the completion of the implementation, there will be a reduction in the demand for local service

Percentage of operations with implemented local community engagement, impact assessments and/or development [GRI 413-1](#)

Percentage of operations with implemented local community engagement, impact assessments and/or development programs	2021			
	Comgás ¹		Compass ²	
	Number	Percentage	Number	Percentage
Social impact assessments based on participatory processes	93	100%	1	100%
Environmental impact assessments and continuous monitoring	93	100%	1	100%
Public disclosure of the results of environmental and social impact assessments	93	100%	1	100%
Local development programs based on the needs of local communities	93	100%	1	100%
Stakeholder engagement plans based on mappings of these parties	93	100%	1	100%
Committees and processes for broad consultation with the local community including vulnerable groups	0	0%	0	0%
Work councils, occupational health and safety commissions and other employee representative bodies to discuss impacts	93	100%	1	100%
Formal grievance and grievance processes by local communities	93	100%	1	100%

1. For the indicator, Comgás considered operations as the total number of municipalities served.
2. For the indicator, Compass considered TRSP as an operation.



Environmental management

BIODIVERSITY

We conceived compensatory plantations in a synergistic manner and with the objective of enhancing forest restoration in a degraded area within the Serra do Mar State Park, in the Atlantic Forest biome. For this, a phytosociological survey of the community of trees and shrubs was carried out, for floristic, structural and regeneration stage characterization, in order to identify the places that demand forest restoration actions and the recommended techniques to enable the restoration of ecological processes in the location. Planting is in progress and so far 4,460 seedlings have been planted in the Comgás area and 1,550 in the TRSP area. Planting activity has also started through direct sowing of juçara palm hearts, with completion scheduled for February 2022.

WATER GRI 303-5

We use water mainly from the distribution concessionaire and we maintain two extra sources of capture, one for rainwater reuse for irrigation and cleaning and another for reuse from the Sewage Treatment Station (ETE) of our Operational Center, reused in toilets. In 2021, water consumption at Comgás was 8,582 ML, a stable number compared to 2020, with only a 1% increase.

Total water consumption (ML) ¹ <small>GRI 303-5</small>			
	2019	2020	2021
Total water consumption	12,676.00	8,474.00	8,582.63

1. Water is not consumed from sources located in regions of water stress.

ENERGY GRI 302-1 | 302-2 | 302-3 | 302-4

We monitor our energy consumption on a monthly basis to identify energy efficiency opportunities. At Comgás' Operational Control Center, we operate a natural gas cogeneration unit, and at the São José dos Campos base, we generate energy locally via a photovoltaic system.

In 2021, we recorded an increase in energy outside the organization, a result influenced by the consumption of industrial customers, with a less restrictive environment during the Covid-19 pandemic.

Energy consumed outside the organization (GJ)¹ GRI 302-2

	2019	2020	2021
Distributed natural gas	166,253,073	155,828,126	178,985,879
Total	166,253,073	155,828,126	178,985,879

1. The parameters and conversion factors used for calculation are those provided in the 2020 National Energy Balance (MME). The indicator only includes Comgás.

Energy intensity¹ GRI 302-3

	2019	2020	2021
Energy intensity (within the organization) - per grid (GJ/km)	3.08	2.87	2.36
Energy intensity (within the organization) - by distributed volume (GJ/MMm ³)	12.20	13.21	9.90

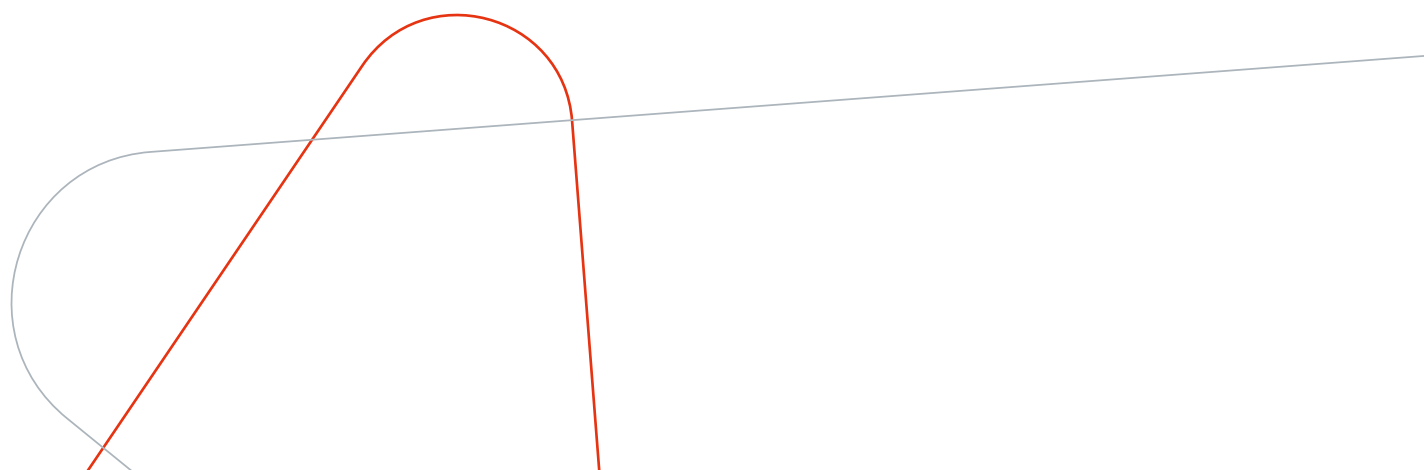
1. The indicator only includes Comgás.

In 2021, Comgás consumed 51,965 GJ of energy, 50% from fuels from non-renewable sources, 23% from renewable sources and 27% from electricity. In relation to 2020, there was a 16% increase in the share of renewable fuels. With the continuity of the Covid 19 pandemic and the maintenance of the home office regime, we closed the floors of the operational buildings of our bases, reducing our electricity consumption. We also kept the structures of our physical stores closed, which resulted in a reduction in electricity consumption. GRI 302-4

Total energy consumed (GJ)¹ GRI 302-1 | 302-4

	2019	2020	2021
Fuels from non-renewable sources	25,744	31,456	26,364
Fuels from renewable sources	12,552	9,869	11,440
Electricity purchased	14,714	14,999	14,161
Electricity sold	0.00	0.00	0
Total	54,548	56,324	51,965

1. The parameters and conversion factors used for calculation are those provided in the 2020 National Energy Balance (MME). The indicator only includes Comgás.



Total energy consumed, by type of consumption (GJ) ¹ GRI 302-1 302-4			
	2019	2020	2021
Fuels from non-renewable sources	25,744	31,456	26,364
Diesel - transport	3,671	3,418	3,423
Gasoline - transport	298	254	485
Natural gas - transport	11,610	12,603	10,566
Natural gas - other consumptions	10,165	15,181	11,889
Fuels from renewable sources	12,552	9,869	11,440
Ethanol - transport	12,552	9,869	11,440
Electricity purchased and sold	16,779	14,999	14,161
Electricity purchased	16,779	14,999	14,161
Electricity sold	0.00	0.00	0.00
Total	55,075	56,324	51,965

1. The parameters and conversion factors used for calculation are those provided in the 2020 National Energy Balance (MME). The indicator only includes Comgás.

WASTE GRI 306-2 | 306-3 | 306-4 | 306-5

We maintain a Solid Waste Management Plan (PGRS), which describes the procedures for the correct management of waste with a view to non-generation, reuse, recycling and environmentally correct final disposal. In the TRSP project, the Solid Waste Management Program of the Basic Environmental Plan (PBA) is being implemented, which presents the guidelines applicable to the implementation of the enterprise, with management and disposal of solid waste in accordance with current legislation (all waste generated during the implementation of the TRSP, is under the management of the EPC, with continuous inspections). To this end, there is a set of recommendations that aim to reduce the generation of waste and determine its management and its disposal, in order to minimize environmental impacts during the construction phase. The main objectives are:

- Ensure the protection of natural resources and the terrestrial ecosystem, through the adoption of relevant control measures in the generation, storage, transport and final disposal of waste generated during the works;
- Ensure proper and temporary management and storage, according to the typology of each solid waste generated;
- Ensure adequate destination (when waste) and final disposal (when tailing) for each type of solid waste.

With regard to the dredged sediments, quality tests were carried out, with the disposal in the Oceanic Disposition Polygon (PDO), an area duly licensed and used for this purpose.

At **Comgás**, due to the pandemic, we carried out actions to limit working positions and also limit access to places of common use, reducing waste generation. Process management is carried out by Comgás, based on internal guidelines and procedures, but collection and transport are carried out by a third-party company. We also carry out internal training on the subject to make employees aware of the procedures involved.

Generated waste ¹ GRI 306-3			
Waste by composition, in metric tons (t)	2019	2020	2021
Paper and Cardboard	24.5	28.1	16.1
Plastic	66.8	142.4	36.0
Metals (iron and aluminum)	235.5	89.6	31.9
Organic	429.1	49.5	36.2
Class ¹	0.0	102.7	2.8
Wood	0.0	21.8	18.4
Civil Construction Waste (rubble)	0.0	78.5	93.5
Total	755.9	512.6	234.8

1. The 2019 and 2020 data did not include Compass operations.

Waste not intended for final disposal ¹ GRI 306-4				
Waste not intended for disposal, in metric tons (t)	2019	2020	2021	
Hazardous waste	Total hazardous waste	0.0	0.0	0.0
Non-hazardous waste	Paper and Cardboard	24.5	28.1	15.7
	Plastic	66.8	142.4	34.8
	Metals	235.5	89.6	31.9
	Glass	0.0	0.0	0.1
	Total non-hazardous waste	326.8	260.1	82.5
Total	326.8	260.1	82.5	

1. The 2019 and 2020 non-hazardous data did not include Compass operations. All waste is disposed of outside the organization.

Waste not intended for disposal by recovery operation, in metric tons (t) ¹ GRI 306-4				
		2019	2020	2021
Hazardous waste	Preparation for reuse	0.0	0.0	0.0
	Recycling	0.0	0.0	0.0
	Other recovery operations	0.0	0.0	0.0
	Total	0	0	0
Non-hazardous waste	Preparation for reuse	0.0	0.0	0.0
	Recycling	326.8	260.1	85.89
	Other recovery operations	0.0	0.0	0.0
	Total	326.8	260.1	85.9
Total	326.8	260.1	85.9	

1. The 2019 and 2020 non-hazardous data did not include Compass operations. All waste is disposed of outside the organization.

Waste intended for disposal by disposal operation, in metric tons (t) ¹ GRI 306-5		
Comgás	2021	
Hazardous waste	Incineration (with energy recovery)	0.0
	Decontamination	0.1
	Landfill confinement	0.0
	Co-processing	2.5
	Total hazardous waste	2.6
Non-hazardous waste	Incineration (with energy recovery)	0.0
	Incineration (no energy recovery)	0.0
	Landfill confinement	147.8
	Other disposal operations	0.0
Total non-hazardous waste	147.8	
Total	150.31	

1. The indicator started to be reported in 2021. All waste is disposed of outside the organization.

EMISSIONS

Scope 3 (indirect greenhouse gas emissions - GHG) (tCO₂e)^{1,2} GRI 305-3

	2019	2020	2021
Upstream			
Transport and distribution (upstream)	3,261.00	3,260.00	1,769.72
Waste generated in operations	568.00	124.00	136.55
Business travel	123.00	24.00	7.37
Subtotal	3,952.00	3,408.00	1,913.64
Downstream			
Use of goods and services sold	9,000,262.00	8,437,401.00	9,672,721.05
Subtotal	9,000,262.00	8,437,401.00	9,672,721.05
Total	9,004,214.00	8,440,809.00	9,674,634.69

1. The gases included in the above calculations are: CO₂ (carbon dioxide); CH₄ (methane); N₂O (nitrous oxide); HFCs (hydrofluorocarbons); PFCs (perfluorocarbons); SF₆ (sulfur hexafluoride).
2. In this document, preliminary data are presented, which contribute to the timing of the dissemination of our emissions. To view the final version, visit the GHG Protocol Public Emissions Registry.

	2019	2020	2021
Biogenic CO₂ emissions – Scope 1 (tCO₂e)^{1,2} GRI 305-1	845.00	738.00	811.38

1. The gases included in the above calculations are: CO₂ (carbon dioxide); CH₄ (methane); N₂O (nitrous oxide); HFCs (hydrofluorocarbons); PFCs (perfluorocarbons); SF₆ (sulfur hexafluoride).
2. In this document, preliminary data are presented, which contribute to the timing of the dissemination of our emissions. To view the final version, visit the GHG Protocol Public Emissions Registry.

	2019	2020	2021
Biogenic CO₂ emissions – Scope 3 (tCO₂e)^{1,2} GRI 305-3	996.00	1,266.00	815.66

1. The gases included in the above calculations are: CO₂ (carbon dioxide); CH₄ (methane); N₂O (nitrous oxide); HFCs (hydrofluorocarbons); PFCs (perfluorocarbons); SF₆ (sulfur hexafluoride).
2. In this document, preliminary data are presented, which contribute to the timing of the dissemination of our emissions. To view the final version, visit the GHG Protocol Public Emissions Registry.

	2019	2020	2021
Intensity of greenhouse gas emissions (tCO₂e/km of distribution network)^{1,2} GRI 305-4	0,94	0,64	0,57

1. The types of GHG emissions included in the intensity rate were direct (Scope 1) and indirect (Scope 2). The gases included in the above calculations are: CO₂ (carbon dioxide); CH₄ (methane); N₂O (nitrous oxide); HFCs (hydrofluorocarbons); PFCs (perfluorocarbons); SF₆ (sulfur hexafluoride).
2. In this document, preliminary data are presented, which contribute to the timing of the dissemination of our emissions. To view the final version, visit the GHG Protocol Public Emissions Registry.

Reduction of greenhouse gas emissions (tCO₂e)¹ [GRI 305-5](#)

	2020	2021
Reductions from direct emissions (Scope 1)	3,606.00	2,816.54
Reductions from indirect emissions from energy acquisition (Scope 2)	0.00	0.00
Reductions from other indirect emissions (Scope 3)	0.00	0.00
Total GHG emission reductions	3,606.00	2,816.54
Reductions from compensation	1,280.00*	0.00

* From the voluntary planting of trees native to the Atlantic Forest in the region of Campinas.

1. In this document, preliminary data are presented, which contribute to the timing of the dissemination of our emissions. To view the final version, visit the GHG Protocol Public Emissions Registry.

Our emissions are calculated based on the GHG Protocol methodology. The 2021 Scope 2 emission factor was 2.2 times the 2020 value for the same period of the year. This increase was due to the lower availability of energy produced by the hydroelectric plants of the Brazilian National Interconnected System. The emission factors are released by the Ministry of Science, Technology and Innovation:

- Average emission factor, 2021: 0.14
- Average emission factor, 2020: 0.06

The GHG emissions data are based on 2019, the period of preparation of our first inventory. For the compilation of corporate GHG inventories, the following references were adopted: Standard NBR ISO 14064; Brazilian Association of Technical Standards, 2007 (ABNT, 2007); Specifications of the Brazilian GHG Protocol Program; Brazilian GHG Protocol Program Verification Specifications; GHG Corporate Protocol - Brazilian GHG Protocol Program (PBGHGP) - Fundação Getulio Vargas; World Resources Institute (FGV/GVces; WRI, 2011). The consolidation approach chosen for emissions is operational control and the gases considered in the inventory are: CO₂ (carbon dioxide); CH₄ (methane); N₂O (nitrous oxide); HFCs (hydrofluorocarbons); PFCs (perfluorocarbons); SF₆ (sulfur hexafluoride).

Gross global Scope 1 emissions, percentage of methane, percentage covered by emission limitation regulations¹ [SASB EM-MD-110a.1](#)

Percentage of GHG emissions from Methane GHG (CH ₄)	2019	2020	2021
	79%	93%	67%

1. In this document, preliminary data are presented, which contribute to the timing of the dissemination of our emissions. To view the final version, visit the GHG Protocol Public Emissions Registry.

Emissions of substances that deplete the ozone layer (ODS) (tCFC-Ue)^{1,2} [GRI 305-6](#)

	2019	2020	2021
	123.08	67.33	0.00

1. Source of emission factors used: Consumption of R-22 in office air conditioning. In 2021 we did not have the purchase of R-22 gas for use in air conditioning in offices.

2. In this document, preliminary data are presented, which contribute to the timing of the dissemination of our emissions. To view the final version, visit the GHG Protocol Public Emissions Registry.

Business strategy

SASB EM-MD: Activity metrics

SASB EM-MD-000.A Total metric ton-kilometers of: (1) natural gas, (2) crude oil, and (3) refined petroleum products transported, by mode of transport

Volume of gas transported by means of transport (m ³)	2019	2020	2021
Transport pipeline	0.00	0.00	0.00
Distribution pipeline	4,512,370,943.00	4,229,421,420.00	4,859,075,999.59
LNG per ship	0.00	0.00	0.00

Volume of gas transported by means of transport (MMBTU)	2019	2020	2021
Transport pipeline	0.00	0.00	0.00
Distribution pipeline	168,749,848.00	158,168,340.00	181,715,632.00
LNG per ship	0.00	0.00	0.00

SASB IF-GU: Information on energy accessibility and appropriate guidance for customers

IF-GU-240a.1. Average retail gas tariff by 1) residential customers; 2) commercials; 3) industrial, and 4) transport services, only: In 2021, there was an increase in the average gas tariff, measured in R\$/m³, for all types of customers, with an increase of 14%, 16% and 29% in tariffs for residential, commercial and industrial customers, respectively. The increase was caused by macroeconomic assumptions (dollar and Brent - barrel of oil) that impact the cost of gas in Petrobras, passed on to the consumer. Another impact was the inflation of the period. During the year, we developed specific programs to support our customers:

Average gas tariff (R\$/m ³)	2019	2020	2021
Residential	4.64	4.61	5.24
Commercial	3.16	3.06	3.56
Industrial	1.72	1.53	1.97

Average gas tariff (R\$/MMBTU)	2019	2020	2021
Residential	123.93	123.17	140.12
Commercial	84.52	81.96	95.22
Industrial	45.97	40.80	52.74

IF-GU-240a.2. Typical monthly gas bill for residential customers for (1) 50 MMBtu and (2) 100 MMBtu of gas delivered per year: In 2021, Comgás' revenue directly resulting from gas delivered to residential customers was R\$1.6 billion, an increase of 18% compared to 2020.

Typical monthly gas bill for residential customers	2019	2020	2021
	55.80	56.99	63.43

Typical monthly gas bill for residential customers (R\$) - indicator adapted for the Brazilian context ¹	2019	2020	2021
8 m ³ /month ²	36.53	39.18	41.70
15 m ³ /month ³	68.49	73.45	78.19

- Indicator adapted from SASB IF-GU-240a.2., as average consumption per customer in the residential segment varies from 8 to 15 m³/month in Comgás' concession area. Unlike the use of natural gas mainly for heating by residential customers in the United States and Europe, in Brazil, natural gas is mostly used for cooking and heating water in homes. In 2021, the average bill for those who consume up to 8 m³ per month was R\$ 41.70 and for those who consume up to 15 m³ it was R\$ 78.19. Both categories showed an increase of 6% compared to 2020.
- For the calculation, the following assumptions were considered: (ordinary cost + unit margin) * 8m³ volume. It is considered the net account, without tax impact.
- idered the net account, without tax impact.

IF-GU-240a.3. Number of residential customer gas disconnections due to non-payment, percentage reconnected within 30 days: In 2020 we had an economic-financial impact due to the pandemic (a worse scenario) which generated a higher rate of default (non-payment). For 2021, in addition to having this financial impact minimized, we sought alternatives and actions were implemented to avoid gas cuts, such as the Gasista Quitação Campaign (in which the gas owner gives the opportunity to pay before the cut) and the Saldão de Dívidas (campaign to payment of old debts at a discount). These factors helped to reduce disconnections from residential customers due to non-payment.

Total number of gas disconnections between residential customers during the notification period resulting from non-payment	2019	2020	2021
	19,131	36,527	15,137

Number and percentage of disconnections that were reconnected within 30 days	2019	2020	2021
Number of previously disconnected residential customers that were reconnected within 30 days from the disconnection date	5,834	21,492	8,838
Percentage of reconnections	30%	59%	58%

IF-GU-240a.4. Discussion on the impact of external factors on the accessibility of gas to the customer, including the economic conditions of the service territory The external factors that cause, or are reasonably likely to cause, a significant impact on the accessibility of gas among the organization's retail customers are competitiveness and radial expansion of gas networks.

Identified factors	Frequency and magnitude at which the factor impacts the accessibility of gas to customers	Trend in the impact of the factor on the gas accessibility for the organization's customers	Risks	Opportunities
Competitiveness	Whenever the price of natural gas becomes non-competitive with alternative energy sources (LPG, Firewood, EE).	Currently, the trend is to gain competitiveness.	Cost increase of tariffs by the regulation model applied to this concessionaire.	Management of gas supplies to guarantee the best price of molecules and efficiency in the management of the concessionaire.
Radial expansion of gas networks	Cost increase of the gas network expansion may affect the access of more customers to this energy source.	Maintenance of current expansion costs, with commitments assumed by the concessionaire for the expansion of the network until 2049.	Stagnation of current gas network length (approximately 20,000 km of pipelines)	Management of material and labor supplies to ensure the best optimal price for the expansion of gas networks.

SASB IF-GU: Integrity of the gas distribution infrastructure

SASB IF-GU-540 a.2 Length and composition of natural gas distribution pipelines (km)

Length and composition of natural gas distribution pipelines (km) ¹	2019	2020	2021
Cast iron distribution network	0	0	0
Steel distribution network	2,289	2,452	2,454
Polyethylene distribution network	15,588	17,016	17,925
Total distribution network	17,877	19,468	20,379
Percentage of natural gas distribution pipelines by composition ¹	2019	2020	2021
Cast iron distribution network	0%	0%	0%
Steel distribution network	13%	13%	12%
Polyethylene distribution network	87%	87%	88%
Total distribution network	100%	100%	100%

1. The indicator includes the distribution network and the branch.

SASB IF-GU-000 C Length of natural gas transport and distribution pipelines (km)			
Length of natural gas transport and distribution pipelines (km)	2019	2020	2021
Transport pipelines	0.00	0.00	0.00
Distribution pipelines	17,877	19,468	20,379

SASB EM-MD Operational Safety, Emergency Preparedness and Response | SASB IF-GU Gas Distribution Infrastructure Integrity

EM-MD-540a.2. Percentage of (1) natural gas pipelines and (2) hazardous liquid pipelines inspected | IF-GU-540.a.3. Length of distribution and transport pipelines inspected (km)

The control of external corrosion of buried pipes is done by the ECDA program (external corrosion direct assessment). ECDA consists of a pre-assessment stage of the sites to be inspected, an indirect inspection stage in which anomalies found in the pipe or coating will be classified according to their criticality, and a direct inspection stage, in which all critical anomalies pointed out are evaluated directly and other points are determined based on operating conditions. In 2019, a 27-kilometer stretch was inspected by ILI - In line inspection. We carry out leak inspection of the entire distribution network and, in 2021, we inspected 53,129.26 kilometers. The inspection is also carried out using the metal magnetic memory (MMM) technique to detect corrosion in the steel network, which represented, in 2021, 285 kilometers of directly inspected network.

Length and percentage of distribution and transport pipelines inspected (km)	2019	2020	2021
Total hazardous liquids transport network (km)	0.00	0.00	0.00
Inspected hazardous liquids transport network (km)	n/a	n/a	n/a
Total natural gas distribution network (km)	17,876.91	19,468.41	20,379.32
Direct inspection for detection of corrosion in the steel network (km)	406.00	410.00	285.94
Inspected natural gas distribution network (km)	54,036.73	58,815.23	53,129.26
Percentage of hazardous liquid pipelines inspected	n/a	n/a	n/a
Percentage of natural gas pipelines inspected ¹	302%	302%	261%

1. We carried out a leak inspection throughout the distribution network 3 times a year, considering the commissioning planning of new pipelines, so the percentage is above 100%.



Content
summary
of GRI

GRI 102-55

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GRI standard	Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG
GRI 101: Foundation 2016					
GRI 102: General Disclosures 2016					
102-1	Organization name	9			
102-2	Activities, brands, products and services	9			
102-3	Location of the organization's headquarters	São Paulo.			
102-4	Place of operations	50, 56, 57, 58			
102-5	Nature of ownership and legal form	6			
102-6	Markets served	50, 56, 57, 58			
102-7	Size of the organization	9, 60			
102-8	Information on employees and other workers	14, 74			
102-9	Chain of suppliers	30			
102-10	Significant changes in the organization and its chain of suppliers	9, 50, 56, 60			
GRI 102: General Disclosures 2016					
102-11	Precautionary approach or principle	Through the Safety, Health, Environment, Quality and Asset Integrity Policy, we assume our commitment to sustainable development. An example is the TRSP Project, conceived after a Location Risk Study and, later, with impacts widely evaluated in the RIMA EIA. All possible impacts identified were minimized through construction techniques or actions of the Basic Environmental Plan (PBA). Comgás has rules and procedures that guide asset maintenance activities, in addition to auditing processes to prevent environmental damage. With these controls, we determine the maturity of internal processes and those of our partners in relation to sustainability practices, and we prepare plans for continuous improvement. With a focus on minimizing impacts to the environment, in 2019 we completed the journey of renovating cast iron networks, an important milestone in our history.			
102-12	External initiatives	17, 32, 41, 43			
102-13	Participation in associations	32, 84			
102-14	Statement by the top management	3			
102-15	Main impacts, risks and opportunities	3, 66			

GRI standard	Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG	
GRI 102: General Disclosures 2016	102-16	Values, principles, standards and codes of behavior	64			16.3
	102-17	Mechanisms for ethics guidance and concerns	65			16.3
	102-18	Governance structure	63			
	102-19	Delegation of authority	Our process of delegation of authority follows the general guidelines of the Articles of Incorporation and the Manual of Delegation of Authority (MDA), disclosed to the entire team through a virtual platform on the Intranet and managed by the Internal Controls area, together with the focal points and managers of the main processes.			
	102-21	Consultation with stakeholders on economic, environmental and social topics	6			
	102-22	Composition of the highest governance body and its committees	63			5.5, 16.7
	102-23	Chairman of the highest governance body	62			16.6
	102-24	Selection and appointment to the highest governance body	62			5.5, 16.7
	102-25	Interest conflicts	65			16.6
	102-26	Role played by the highest governance body in defining purpose, values and strategy	63			
	102-28	Assessment of the performance of the highest governance body	62			
	102-29	Identification and management of economic, environmental and social impacts	67			16.7
	102-30	Effectiveness of risk management processes	66			
	102-32	Role played by the highest governance body in sustainability reporting	6			
	102-35	Remuneration policies	63			

GRI standard	Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG
GRI 102: General Disclosures 2016	102-36	Process for determining remuneration	To determine remuneration, we use a job evaluation methodology defined corporately by Grupo Cosan. Annually, we update the table with salary ranges according to the level of responsibility of the position. This update is approved by the People Committee and carried out with the support of independent specialist consultants, who do not have any additional relationship with the company.		
	102-37	Stakeholder involvement in remuneration	In addition to participating annually in a salary survey to assess positioning in accordance with the strategy, we carry out an annual performance evaluation of employees, taking into account the result of the goals and behavioral analysis. In addition, excluding managers, we signed a collective agreement with the Union for annual salary readjustments and other clauses provided for. During the period, we did not vote on remuneration policies and proposals.		16.7
	102-38	Proportion of total annual remuneration	In 2021, the proportion between the total annual remuneration of the highest-paid individual and the total average annual remuneration of all employees was 3% (5% in 2020 and, in 2019, 2%). The calculation of the remuneration considered the following formula: Remuneration = (Base salary + personal advantage + hazard) *13.33 + target PPR + target ILP. In 2019 and 2020, only Comgás data were reported, while in 2021 we included Compass.		
	102-39	Proportion of increase in total remuneration	In 2021, the highest remuneration paid grew 103.9% compared to 2020. The percentage increase in average annual total remuneration, excluding the highest-paid individual, was 26.8%. That is, the percentage increase in the best remuneration paid is 4.88 times greater than the increase perceived by the others.		
	102-40	List of stakeholder groups	6		
	102-41	Collective bargaining agreements	In 2021, 87% of employees were eligible for collective bargaining (excluding coordination, management and directors).		
	102-42	Identification and selection of stakeholders	6		
	102-43	Approach to stakeholder engagement	6		
	102-44	Main concerns and topics raised	7		

GRI standard	Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG
GRI 102: General Disclosures 2016	102-45	Entities included in the consolidated financial statements	All entities included in the organization's consolidated financial statements or equivalent documents are considered in the Sustainability Report. Therefore, it is considered Comgás, Compass Comercialização, TRSP, Route 4, Compass Geração and Compass Energia.		
	102-46	Definition of Report Content and Topic Boundaries	6		
	102-47	List of material topics	7		
	102-48	Information reformulations	Information reformulations, when applicable, are noted throughout the report in footnotes.		
	102-49	Changes in the report	6		
	102-50	Period covered by the report	6		
	102-51	Most recent report date	Last report published in 2020.		
	102-52	Reporting cycle	Annual.		
	102-53	Contact for questions about the report	6		
	102-54	Reporting statements in compliance with GRI Standards	6		
	102-55	Content summary of GRI	99		
	102-56	External verification	6, 117		
Material topics					
Investments in infrastructure and development of the gas and energy market					
GRI 103: Management Method 2016	103-1	Explanation of the material topic and its limits	7, 10		
	103-2	Management approach and its components	10, 48		9
	103-3	Evolution of the management approach	10, 48		
GRI 203: Indirect economic impacts 2016	203-1	Investments in infrastructure and support services	32, 56		5.4, 9.1, 11.2
		Significant indirect economic impacts	32, 56, 85		1.2, 1.4, 3.8, 8.2, 8.5

GRI standard		Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG
GRI 206: Unfair competition 2016	206-1	Lawsuits for unfair competition, trust and monopoly practices	Not registered.		1, 5	16.3
Customer relationship and natural gas accessibility						
GRI 103: Form of Management 2016	103-1	Explanation of the material topic and its limits	7, 10			
	103-2	Management approach and its components	10, 25			7, 9
	103-3	Evolution of the management approach	10, 25			
Energy efficiency and reduction of Greenhouse Gas (GHG) emissions						32, 56
GRI 103: Form of Management 2016	103-1	Explanation of the material topic and its limits	7, 10			
	103-2	Management approach and its components	10, 41			7, 13
	103-3	Evolution of the management approach	10, 41			
GRI 201: Economic performance 2016	201-2	Financial implications and other risks and opportunities arising from climate change	68			13.1
GRI 302: Energy 2016	302-1	Energy consumption within the organization	87, 88, 89			7.2, 7.3, 8.4, 12.2, 13.1
	302-3	Energy consumed outside the organization	87, 88			7.3, 8.4, 12.2, 13.1
	302-3	Energy intensity	87, 88			7.3, 8.4, 12.2, 13.1
	302-4	Reduction of energy consumption	87, 88, 89			7.3, 8.4, 12.2, 13.1

GRI standard	Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG	
GRI 305: Emissions 20162016	305-1	Direct emissions (Scope 1) of greenhouse gases (GHG)	41, 44, 92		7, 8, 9	3.9, 12.4, 13.1, 14.3, 15.2
	305-2	Indirect emissions (Scope 2) of greenhouse gases (GHG) from energy acquisition	41, 44		7, 8, 9	3.9, 12.4, 13.1, 14.3, 15.2
	305-3	Other indirect emissions (Scope 3) of greenhouse gases (GHG)	41, 92		7, 8, 9	3.9, 12.4, 13.1, 14.3, 15.2
	305-4	Intensity of greenhouse gas emissions (GHG)	41, 92		7, 8, 9	3.9, 12.4, 13.1, 14.3, 15.2
	305-5	Reduction of greenhouse gas (GHG) emissions	41, 93		7, 8, 9	13.1, 14.3, 15.2
	305-7	NOX, SOX and other significant atmospheric emissions	Compass's current inventory only contemplates GHG emissions regulated by the Kyoto Protocol: CO2, CH4, N2O, SF6, PFCs, HCFCs and regulated by the Montreal Protocol (CFCs and HCFCs). Therefore, NOx, SOx, volatile organic compounds, PAHs and particulate matter are not monitored.		7, 8, 9	3.9, 12.4, 13.1, 14.3, 15.2
Creating and distributing value, including in the communities in which we operate						
GRI 103: Management Method 2016	103-1	Explanation of the material topic and its limits	7, 10			
	103-2	Management approach and its components	10, 30, 32			8, 9, 11
	103-3	Evolution of the management approach	10, 30, 32			
GRI 201: Economic performance 2016	201-1	Direct economic value generated and distributed	60			8.1, 8.2, 9.1, 9.4, 9.5

GRI standard		Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG
GRI 202: Market presence 2016	202-1	Proportion between the lowest wage and the local minimum wage, with discrimination by gender	20, 75			1.2, 5.1, 8.5
GRI 204: Purchasing Practices 2016	204-1	Proportion of expenses with local suppliers	83			8.3
GRI 308: Environmental assessment of suppliers 2016	308-2	Negative environmental impacts in the supply chain and measures taken	30, 83		7, 8, 9	
GRI 408: Child labor 2016	408-1	Operations and suppliers with significant risk of child labor cases	30		1, 2, 6	8.7, 16.2
GRI 409: Forced or slave-like labor 2016	409-1	Operations and suppliers with significant risk of cases of forced or compulsory labor	30		1, 2, 3	8.7
GRI 413: Local Communities 2016	413-1	Engaged operations, impact assessments and local community development programs	32, 86			
	413-2	Operations with significant negative impacts - actual and potential - on local communities	32, 36, 56			1.4, 2.3
GRI 414: Social assessment of suppliers 2016	414-2	Negative social impacts on the supply chain and measures taken	30			5.2, 8.8, 16.1
Operational risk management and asset integrity						
GRI 103: Management Method 2016	103-1	Explanation of the material topic and its limits	7, 10			
	103-2	Management approach and its components	10, 20, 52			3, 11
	103-3	Evolution of the management approach	10, 20, 52			

GRI standard	Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG
GRI 403: Occupational Health and Safety 2018	403-1	Occupational health and safety management system	20, 52		8.8
	403-2	Hazard identification, risk assessment and incident investigation	20		8.8
	403-3	Occupational health services	20		8.8
	403-4	Worker participation, consultation and communication with workers regarding health and safety at work	20		8.8, 16.7
	403-5	Training of workers in occupational health and safety	22		8.8
	403-6	Promotion of worker's health	24		3.3, 3.5, 3.7
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked to business relationships	20		8.8
	403-8	Workers covered by an occupational health and safety management system	All (100%) employees and workers were covered by SSO in 2021.		8.8
	403-9	Work accidents	22, 77, 78		3.6, 3.9, 8.8, 16.1
	403-10	Professional diseases	22, 79		3.3, 3.4, 3.9, 8.8, 16.1
GRI 416: Consumer Health and Safety 2016	416-2	Cases of non-compliance in relation to health and safety impacts caused by products and services	Not identified in the last three years.		16.3

GRI standard		Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG
Best corporate governance practices						
GRI 103: Management Method 2016	103-1	Explanation of the material topic and its limits	7, 10		1, 2, 3, 4, 5, 6, 7, 8, 9, 10	5, 16
	103-2	Management approach and its components	10, 61, 64			
	103-3	Evolution of the management approach	10, 61, 64			
GRI 205: Anti-Corruption 2016	205-1	Operations evaluated for risks related to corruption	72		10	16.5
	205-2	Communication and training in anti-corruption policies and procedures	72, 82		10	16.5
	205-3	Confirmed cases of corruption and actions taken	72		10	16.5
GRI 207: Taxes 2019	207-1	Tax approach	Our tax strategy aims to combine the due compliance with tax legislation with maximum efficiency, from the point of view of results and cash. The approach is based on compliance with tax obligations and on an ethical relationship with tax authorities, with a view to enabling maximum tax efficiency and making the business profitable, always considering ethics and honesty in the procedures adopted. In the event of any change in procedure that may eventually represent some risk, the topic is discussed not only by the tax area, but also by the Tax Committee of the Cosan Group, the Fiscal Council and our Chief Financial Officer. Bimonthly, relevant points and opportunities are discussed in the Tax Committee and quarterly, on an ordinary basis, in the Fiscal Council.			1.1, 1.3, 10.3, 17.1, 17.3
GRI 307: Environmental Compliance 2016	307-1	Non-compliance with environmental laws and regulations	They were not registered in the last three years in the Compass and Comgás operations.		7, 8, 9	16.3
GRI 415: Public Policies 2016	415-1	Political contributions	We do not make political contributions.		10	16.5
GRI 419: Socioeconomic Compliance 2016	419-1	Non-compliance with laws and regulations in the socioeconomic area	In the last three years (2019, 2020 and 2021) there were no significant fines or relevant non-monetary sanctions in 2021 for Compass and Comgás. The TRSP project, for example, was duly licensed and authorized in accordance with current legislation and obtained all the environmental licenses and regulatory authorizations necessary for its implementation.		10	16.3

GRI standard		Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG
Attracting and developing people and promoting diversity						
GRI 103: Management Method 2016	103-1	Explanation of the material topic and its limits	7, 10			
	103-2	Management approach and its components	10, 14, 15, 16		6	4, 5, 8, 10
	103-3	Evolution of the management approach	10, 14, 15, 16			
GRI 401: Employment 2016	401-1	New hires and employee turnover	14, 75, 76		6	5.1, 8.5, 8.6, 10.3
	401-2	Benefits offered to full-time employees that are not offered to temporary or part-time employees	20			3.2, 5.4
	401-3	Maternity/paternity leave	20, 77		6	5.1, 5.4, 8.5
GRI 404: Training and Education 2016	404-1	Average hours of training per year, per employee	18, 79		1, 6	4.3, 5.1, 8.2, 8.5, 10.3
	404-2	Programs for improving employee skills and career transition assistance	18			8.2, 8.5
	404-3	Percentage of employees receiving regular performance and career development assessments	18		1, 6	5.1, 8.5, 10.3
GRI 405: Diversity and equal opportunity 2016	405-1	Diversity in governance bodies and employees	16, 80, 81			5.1, 5.5, 8.5
	405-2	Ratio of base salary and remuneration received by women and those received by men	16, 81			5.1, 8.5, 10.3

GRI standard		Content	Page numbers and/or URL(s) and/or direct response	Omission	Principles of Global Pact	SDG
Other non-material indicators that we consider relevant to report						
GRI 303: Water and effluents 2018	303-5	Water consumption	87			6.4
	306-2	Management of significant waste-related impacts	89			3.9, 6.3, 11.6, 12.4, 12.5
GRI 306: Waste 2020	306-3	Waste generated	89, 90			3.9, 11.6, 12.4, 12.5
	306-4	Waste not intended for final disposal	89, 90			3.9, 11.6, 12.4, 12.5
	306-5	Waste intended for final disposal	89, 91			3.9, 11.6, 12.4, 12.5

The background features several abstract, overlapping lines. A prominent red line starts from the top left, curves downwards, and then loops back towards the bottom right. A grey line starts from the top left, curves downwards, and then loops back towards the bottom right, crossing the red line. The overall composition is minimalist and modern.

Content
summary
of SASB

11

Gas Services and Distributors

Themes for Disclosure of Sustainability and Accounting Metrics

Theme	Code	Accounting metric	Category	Unit of Measurement	Page numbers and/or URL(s) and/or direct response
Energy pricing information and fair advice for customers	IF-GU-240a.1	Average retail gas tariff by 1) residential customers; 2) commercials; 3) industrial, and 4) transport services, only;	Quantitative	Rate	95
	IF-GU-240a.2	Typical monthly gas bill for residential customers for (1) 50 MMBtu and (2) 100 MMBtu of gas delivered per year:	Quantitative	Reporting currency	95, 96
	IF-GU-240a.3	Number of residential customer gas disconnections due to non-payment, percentage reconnected within 30 days	Quantitative	Number, Percentage	96
	IF-GU-240a.4	Discussion on the impact of external factors on the accessibility of gas to the customer, including the economic conditions of the service territory	Analysis and discussion	(%)	97
End-use efficiency	IF-GU-420a.1	Percentage of gas utility revenues from fee structures that (1) are decoupled or (2) contain a lost revenue adjustment mechanism (LRAM)	Quantitative	n/a	The concessionaire does not yet have any type of revenue from energy efficiency applied to its customers.
	IF-GU-420a.2	Customer gas savings from market efficiency measures	Quantitative	Percentage (%)	We do not have a differentiated tariff for customers who prove energy efficiency, but we act actively in communication and tips to reduce consumption and consequently energy efficiency.

Theme	Code	Accounting metric	Category	Unit of Measurement	Page numbers and/or URL(s) and/or direct response
Integrity of the gas distribution infrastructure	IF-GU-540a.1	Number of (1) reported pipeline incidents, (2) Corrective Action Orders (CAO) and (3) Notices of Probable Violation (NOPV)	Quantitative	Number	In 2021, we had no incidents of this nature.
	IF-GU-540a.2	Percentage of distribution conduct that is (1) cast and/or wrought iron and (2) unprotected steel	Quantitative	Percentage (%) by extension	97
	IF-GU-540a.3	Length of distribution and transport pipelines inspected (km)	Quantitative	Percentage (%) by extension	98
	IF-GU-540a.4	Description of efforts to manage the integrity of the gas delivery infrastructure, including risks related to safety and emissions	Quantitative	n/a	52
Activity metrics	IF-GU-000.A	Number of (1) residential, (2) commercial, and (3) industrial customers served	Quantitative	Number	55
	IF-GU-000.B	Volume of natural gas distributed to: (1) residential customers, (2) commercial customers, (3) industrial customers, and (4) transferred to a third party	Quantitative	Million British Thermal Units	55
	IF-GU-000.C	Length of (1) transport and (2) natural gas distribution pipelines (km)	Quantitative	(MMBtu)	55

Oil and Gas Midstream

Themes for Disclosure of Sustainability and Accounting Metrics

Theme	Code	Accounting metric	Category	Unit of Measurement	Page numbers and/or URL(s) and/or direct response
GHG emissions	EM-MD-110a.1	Gross global Scope 1 emissions, percentage of methane, percentage covered by emission limitation regulations	Quantitative	Metric ton (t) CO ₂ , percentage (%)	41, 93
	EM-MD-110a.2	Discussion of the long-term and short-term strategy or plan for managing Scope 1 emissions, emission reduction targets and a review of performance against these targets	Discussion and analysis	n/a	11, 41
GHG emissions	EM-MD-120a.1	Atmospheric emissions of the following pollutants: Nox (excluding N ₂ O), SO _x , volatile organic compounds (VOCS) and particles (PM ₁₀)	Quantitative	Metric ton	Compass's current inventory only contemplates GHG emissions regulated by the Kyoto Protocol: CO ₂ , CH ₄ , N ₂ O, SF ₆ , PFCs, HCFCs and regulated by the Montreal Protocol (CFCs and HCFCs). Therefore, NO _x , SO _x , volatile organic compounds, PAHs and particulate matter are not monitored.

Theme	Code	Accounting metric	Category	Unit of Measurement	Page numbers and/or URL(s) and/or direct response
Ecological Impacts	EM-MD-160a.1	Description of environmental management policies and practices for active operations	Analysis and discussion		The TRSP is in the implementation stage and is expected to start operating in 2023, so we understand that the indicator is not applicable. However, we have mapped the potential negative impacts during the operation, identified in the preparation of the Environmental Impact Study (EIA), with environmental programs that will be implemented to monitor these identified potential impacts. The preparation and execution of the Environmental Operation Plan are foreseen when the TRSP starts operating.
	EM-MD-160a.2	Percentage of land owned, leased and/or operated within areas of protected conservation status or endangered species habitat	Quantitative	Percentage (%) by area	The TRSP will not be implemented in environmental preservation areas or conservation units. The project design was premised on minimizing environmental impacts in sensitive areas, with the only interference in the mangrove area through the non-destructive, directional hole construction method.
	EM-MD-160a.3	Land area disturbed (impacted), percentage of impacted area restored	Quantitative	Hectares, Percent	Potential impacts on the ecosystem are predicted for the year 2022. Therefore, we understand that this indicator is not currently applicable and will be reported in the next report.
	EM-MD-160a.4	Aggregate number and volume of oil spills, volume in the Arctic, volume in exceptionally sensitive areas (USAs), and volume recovered	Quantitative	Number, Barrels	Indicator not applicable, since we are not in operation and natural gas is not susceptible to contamination of soil or sensitive areas, as it is less dense than air, unlike oil. When an eventual natural gas leak occurs, there is no loss of biodiversity.
Competitive behavior	EM-MD-520a.1	Total amount of monetary losses as a result of legal proceedings associated with federal pipeline and storage regulations			Indicator not applicable, as current operations are regulated by the ARSESP (state level).

Theme	Code	Accounting metric	Category	Unit of Measurement	Page numbers and/or URL(s) and/or direct response
	EM-MD-540a.1	Number of reportable piping incidents, significant percentage	Quantitative	Number, percentage (%)	In 2021, we had no incidents of this nature.
	EM-MD-540a.2	Percentage of natural gas pipelines and hazardous liquid pipelines inspected	Quantitative	Percentage (%)	98
	EM-MD-540a.3	Number of accident releases and non-accident releases (NARs) from rail transport	Quantitative	Number	Indicator not applicable, since we do not have rail transport operation.
Critical incident risk management	EM-MD-540a.4	Discussion of management systems used to integrate a culture of safety and emergency preparedness across the value chain and throughout project lifecycles	Discussion and analysis		<p>Annually, we review our SGSSM and identify stakeholders and their needs and expectations, and act to meet individual needs. We have an annual communication plan, which includes the various stakeholders. This plan is based on the strategy to be worked on for each of the parties. The SSM area is responsible for employee engagement campaigns on safety issues. We have three types of monthly committees, namely: with the board, with employees and with contractors. In these committees, we analyze monthly indicators and accidents, always looking for continuous improvement.</p> <p>We also have the continuous management of safety indicators (Critical Safety Elements), a basket of indicators in Operational Safety and Asset Integrity that measures our performance in the year.</p>
Activity Metrics	EM-MD-000.A	Total tonne-kilometers (tkm) of natural gas, crude oil and refined petroleum products transported, by means of transportation	Quantitative	Tonne-kilometer (tkm)	94

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Independent Auditors' Limited Assurance Report on the Compass Gás e Energia S.A. Annual Sustainability Report based on GRI – Standards (In accordance – “Core”) and Sustainability Accounting Standards Board (SASB)

To the Shareholder, Advisers and Directors of
Compass Gás e Energia S.A
São Paulo – SP

Introduction

We were engaged by Compass Gás e Energia S.A (“Company” or “Compass”) management to present our limited assurance report on the Holding's indicators contained in the Annual Sustainability Report based on Global Reporting Initiative (“GRI”) – Standards and Sustainability Accounting Standards Board (SASB) for the twelve-month period ended December 31, 2021 (“Report”).

Management and governance responsibilities for the Report

Compass's management is responsible for preparing and presenting appropriately the information contained in Report in accordance with criteria, assumptions and requirements of the GRI guidelines (In accordance – “Core”), Sustainability Accounting Standards Board (SASB), and for the internal controls as management determines is necessary to enable the preparation of information free from material misstatement, whether due to fraud or error.

Independent auditors' responsibility

Our responsibility is to express a conclusion on the Compass's Report information, based on the limited assurance work conducted in accordance with Technical Notice of Ibracon № 07/2012, approved by the Brazil's National Association of State Boards of Accountancy (CFC) in light of NBC TO 3000 (Assurance Work Other Than Audit or Review), issued by the CFC, which is equivalent to international standard ISAE 3000, issued by the International Federation of Accountants, applicable to non-historical information. These standards call for compliance with ethic requirements, including independence and work carried out to obtain limited assurance that the Report is free of material misstatement.

A limited assurance work conducted in accordance with NBC TO 3000 (ISAE 3000) consists mainly of inquires of management and other professionals from Compass who were involved in the preparation of the Report, as well as of the application of additional procedures deemed necessary to obtain evidence which enables us to conclude on the limited assurance on the Report. A limited assurance work also requires additional procedures, as the independent auditor becomes aware of matters that lead him to believe that the Report information may contain material misstatement.

The selected procedures relied on our understanding of the aspects concerning the compilation and presentation of the Report information in accordance with criteria, assumptions and own methodologies from Compass. The procedures comprised:

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Independent auditors' responsibility – continuation

- (a) the planning of the work, considering the materiality, the volume of quantitative and qualitative information and the operating and internal control systems which supported the preparation of the Report;
- (b) the understanding of the calculation methodology and the procedures for preparation and compilation of the Report through interviews with management in charge of preparing the information;
- (c) the application of analytical procedures on quantitative information and sample verification of certain evidence supporting the data used for the preparation of the Report;
- (d) comparison of the financial indicators with the financial statements and/or accounting records.

The procedures applied in this limited assurance work also comprised compliance with the guidelines of the structure for development of the GRI and SASB applicable in the preparation of the information contained in the Compass's Report.

We believe that the evidence obtained in our work was sufficient and appropriate to provide a basis for our limited conclusion.

Scope and limitations

The procedures applied in a limited assurance work are substantially less in scope than those applied in an assurance work aimed at issuing an opinion on the Report information. As a consequence, we are not in a position to obtain assurance that we are aware of all matters which would be identified in an assurance work aimed at issuing an opinion. Had we carried out a work to issue an opinion, we could have identified other matters or misstatements in the Report information. Accordingly, we did not express an opinion on this information. In addition, Compass's internal controls were not part of our limited assurance scope.

Only the Holding's information contained on the indicators was part of the scope of our limited assurance work. Thus, we perform limited assurance procedures exclusively on such information.

The non-financial data is subject to further inherent limitations than financial data, given the nature and diversity of methods used to determine, calculate or estimate such data. Qualitative interpretations of materiality, significance and accuracy of data are subject the individual assumptions and judgments. Also, we did not carry out any work on data reported for prior periods nor in relation to future projections and goals.

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Conclusion

Based on the procedures performed and herein described, nothing came to our attention that makes us believe that the GRI and SASB KPIs presented on the Report, for the twelve-month period ended December 31, 2021, was not prepared, in all material respects, in accordance with criteria, assumptions and methodologies for the preparation of the KPI's based on requirements of the Global Reporting Initiative – Standards (In accordance – “Core”) and Sustainability Accounting Standards Board (SASB).

São Paulo (SP), April 13th, 2022.

Ernst & Young

Audidores Independentes S.S
CRC-2SP015199/O-6



Leonardo Masseli Dutra
Sustainability Executive Director

Flavio A. Machado
Partner – CRC-1MG 065.889/O-2

Corporate information

Compass

Av. Brigadeiro Faria Lima, 4.100
4º Andar - Itaim Bibi
04538-132 - São Paulo (SP) - Brasil

Credits

General coordination and management: Institutional Communication, Sustainability and Investor Relations Team

Writing and review: KMZ Conteúdo

Indicator consulting: Avesso Sustentabilidade

Graphic design and diagramming: Alastra Comunica

Pictures: Compass Archive, Istockphoto Image Bank

Translation (English version): Flash Traduções