

## Policy on Persons and Human Rights

### 1. Goal

To formalize our commitment to fully respecting Human Rights and promoting them in all our activities, generating value by producing oil and natural gas safely, efficiently, and responsibly.

To direct and establish criteria to ensure that, in the relationship with all stakeholders, Enauta builds interactions with long-term goals and aligned to the promotion of universal peace.

To support strategic, tactical, and operational planning, and guide stakeholder relationships in all activities performed. To preserve corporate values and culture in interpersonal relations with all agents of the oil and gas sector and of society.

### 2. References

As an independent Brazilian oil and gas exploration and production company, we act in accordance with the guidelines of the international conventions and treaties on Human Rights to which the country is a signatory. We understand that our license to operate is secured by acting responsibly and diligently, thus, we take necessary and possible measures to prevent, mitigate, and control risks and impacts in order to keep people safe and respect human activities in all our activities.

The safety of operations, employees, and third parties is our priority. The management of critical elements of operational safety is continuously improved to prevent accidents and promote the health of all persons involved in the operations (see **Operational Security Policy**).

We recognize the importance of the **Universal Declaration of Human Rights**<sup>1</sup> in promoting peace, justice, prosperity, and respect for persons,

We guide our actions according to the **Guiding Principles on Business and Human Rights**<sup>2</sup>, the **2030 Agenda**<sup>3</sup> and the **17 Sustainable Development Goals (ODS)** formulated and approved by the United Nations (UN),

We support and follow the International Labor Organization's (ILO) **Declaration on Fundamental Principles and Rights at Work**<sup>4</sup> (OIT),

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<sup>1</sup> adopted and proclaimed by the United Nations General Assembly (resolution 217 A III) in December 10, 1948.

<sup>2</sup> approved by the United Nations Human Rights Council in 2011

<sup>3</sup> The 2030 Agenda is an action plan for persons, the planet, and prosperity that seeks to strengthen universal peace. The plan outlines 17 Sustainable Development Goals, the SDGs, and 169 targets, to eradicate poverty and promote a decent life for all, within the limits of the planet.

<sup>4</sup> adopted at the 86<sup>th</sup> International Labor Conference in 1998, it calls for the eradication of slave and child labor, non-discrimination in labor, and freedom of association.

We recognize and respect the fundamental rights and guarantees of childhood, established in Brazil by the **Statute of the Child and Teenager**<sup>5</sup>,

This Policy complies with the laws, the **Bylaws**, the **Code of Ethical Conduct**, the **Anticorruption Policy**, in addition to all the Company's applicable internal regulations.

### 3. Guidelines

Our commitment to human rights demands knowledge and action to identify and assess violation risks and establish mechanisms to promote them:

- (i) the Eradication of Child Labor
- (ii) the Eradication of Forced or Compulsory Labor
- (iii) the Fight against Discrimination in all its forms
- (iv) the Valorization of Diversity
- (v) the Fight against Bullying and Sexual Harassment
- (vi) the Respect for Free Trade Union Membership and the Right to Collective Bargaining

These guidelines apply to the relationships with the various publics in all the activities performed by Enauta; among them are those listed below, but not limited to:

#### **Employees**

We build and preserve a work environment free from prejudice and any kind of discrimination. We offer everyone equal conditions for access to hiring opportunities, remuneration, and professional development. We have established transparent and safe channels for reporting violence or psychological, physical, moral and sexual harassment in work relations. We respect and guarantee the right to freedom of association and collective bargaining. We promote diversity in gender, race, and sexual orientation (LGBTQIA+) in personnel management, respecting individual and cultural differences and guaranteeing freedom of expression and opinion. We also pursue affirmative initiatives to increase diversity and inclusion in our workforce.

#### **Suppliers, Partners and Customers**

We do not tolerate practices and attitudes that disrespect or violate human rights in our operations or those of our suppliers. We adopt mechanisms to combat and apply disciplinary measures against discriminatory actions (ethnicity, gender, sexual orientation, etc.), the

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<sup>5</sup> Act No. 8.069, of July 13, 1990, and related legislation.

exploitation of children and teenagers, degrading labor practices or those analogous to slave labor. We encourage and demand from our business partners full respect for Human Rights and compliance with the guidelines in this Policy in all their activities, monitoring violation risks through *due diligence* processes in our supply chain. We fight all forms and degrading labor practices and noncompliance with the applicable legislation on the organization of labor (see **SGI Policy and Safety, Environment and Health Guidelines**).

### **Local Communities**

For the field activities, carried out close to the communities, we took the necessary precautions in order to respect their cultural aspects, with special attention to Traditional Peoples and Communities **(PCT)**<sup>6</sup>. We structure actions for continuous engagement and direct communication with the communities that are part of the area of influence of the assets we operate. In these interactions, we are committed to disseminating the **Guiding Principles on Business and Human Rights**. We encourage social initiatives and projects aimed at promoting citizenship and human rights through Private Social Investment (ISPs), sponsorships and philanthropic donations (see the **Community Relationship Procedure** and the **Sponsorship, Institutional Support and Philanthropic Donations Procedure**)

### **Society**

We act in an ethical and transparent way with the intention of strengthening the relationship with all our stakeholders, using various mechanisms to disseminate and reinforce our guidelines, values, and institutional information in general, by disclosing data regarding our results in periodic reports and other platforms. (see the **Communication, Consultation and Participation Procedure**)

### **Shareholders**

We disclose our commitment to respecting Human Rights to all the company's shareholders and have established processes for communicating and evaluating compliance with these guidelines in our corporate governance, through the resolutions of the Board of Directors and the meetings of the Committee of Corporate Governance, Strategy and Sustainability.

### **Authorities and governmental bodies**

We adhere to government initiatives aimed at promoting Human Rights. Through participation in representative associations of the oil and gas sector, we collaborate in the formation of public policies and initiatives that adhere to our commitment. We comply with the legislation and regulations of the locations where we operate.

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<sup>6</sup> According to the National Policy for the Sustainable Development of Traditional Peoples and Communities (PNPCT) among Traditional Peoples and Communities (PCTs) of Brazil are the indigenous peoples, the *quilombolas*, extractivists, craft fishermen, among others.

## 4. External Initiatives

We have increased our commitment to the valuation of Human Rights through partnerships with sectorial entities, civil society organizations, governmental bodies, and other actors in society.

Corporate participation and representation in multilateral initiatives with this objective are encouraged by the Company's shareholders and management. In addition, our management model is guided by the most stringent market standards.

Among the public commitments made and incorporated in our management are:

United Nations Global Compact (UN) and its associated programs, such as the **Platform for Action Against Corruption**<sup>7</sup>.

**Equator Principles (EPs)**<sup>8</sup>, risk management framework, adopted by financial institutions, for determining, assessing, and managing environmental and social risks in projects.

Performance Standards of the **International Finance Corporation (IFC)**<sup>9</sup>, of the World Bank Group, which establishes technical and organizational requirements for managing socio-environmental risks in projects.

## 5. Policy Administration

### **Board of Directors**

Responsible for approving and resolving on the Policy, and evaluating the execution of the Company's sustainability strategy, supported by the Governance, Ethic and Sustainability Committee.

### **Governance, Ethic and Sustainability Committee**

Responsible for evaluating, prior to the Board of Directors' resolutions, the initiatives related to the principles and themes of this Policy, directing the executive teams to adopt the best practices in Human Rights.

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<sup>7</sup> An initiative that promotes learning, constructive dialogue, and the exchange of experiences in the field of anticorruption and integrity promotion in Brazil, in light of Principle 10 of the Global Compact.

<sup>8</sup> Financial management tool for sustainable projects

<sup>9</sup> IFC is the World Bank Group's member institution focused on strengthening the private sector in developing countries to fight poverty.

### **Executive Board**

Responsible for creating, implementing, executing and evaluating the Company's results and actions that materialize the purpose of "Being the leading independent oil and gas production company in Brazil" and thus contribute to the respect for Human Rights and the generation of value for all the Company's stakeholders.

### **Sustainability Management**

Responsible for disseminating the culture and vision of sustainability among the internal and external publics, supporting the other areas in the creation, structuring, and execution of projects, programs, and goals that strengthen commitment to Human Rights.

### **Human Resources Management**

Responsible for planning and managing affirmative actions that promote diversity and inclusion in our company, in line with the strategic guidelines set by the Board of Directors and the Executive Board.

### **Managements and other areas**

All Enauta's employees are responsible for the observance of the Policy guidelines in their activities and areas of responsibility, disseminating respect for Human Rights and developing their activities diligently to improve performance in environmental, economic and social aspects.

## 6. Scope

The Policy applies to Enauta Participações S.A. and all its controlled companies ("Company"). The provisions of this Policy must be observed by all employees and legal representatives, as well as suppliers acting on behalf of the Company.

## 7. Communication

The Company is committed to the disclosure and dissemination of this Policy, as well as of the actions taken and results achieved, so that all stakeholders can follow the evolution of corporate governance and management on the commitment to respect Persons and Human Rights.