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REVIEW AND APPROVAL

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1. PURPOSE

ENEVA S.A. and its subsidiaries (“ENEVA” or “Company”) acknowledge that the development of its activities and the characteristics inherent to the power/energy sector represent challenges relating to human rights. Accordingly, the purpose of this Human Rights Policy (“Policy”) is to define the ENEVA’s main guidelines to respect the human rights and promote non-discriminatory practices and diversity in the work environment.

2. APPLICATION

This Policy is applicable to all Directors and Executive Officers and Associates and any Third Parties acting on behalf of ENEVA, regardless of the level of authority. All ENEVA’s Directors and Executive Officers are committed with the rules established in this Policy and are responsible to promote and act through the guidelines set forth herein.

3. DEFINITIONS

Directors and Executive Officers: executive officers and Board of Directors’ members.

Harassment: any offensive, inadequate, insistent and persistent behaviour, which characterizes continuous persecution, suggestion or interest in relation to any person, without the consent of the other party, including, but not limited to, verbal and physiological aggressions, abuses or sexual aggressions, exposure of any person to humiliating and embarrassing situations.

Associates: all the Company’s employees, as well as anyone that holds a job-position, function, employment relationship, commercial, professional, contractual or a trust relationship with the Company, as well as interns, young apprentices and trainees.

Human Rights: all essential and universal rights inherent to all individuals, internationally recognized by the Universal Declaration of Human Rights of the United Nations and other applicable rules, entitled to any individual, regardless of social class, race, nationality, religion, culture, profession, gender, sexual orientation or any other conditions that may differentiate human beings.

Discrimination: any conduct that violates the human rights of any individual, based on reasoning without adequate knowledge of the matter, which results in an unfair and groundless conduct, including, but not limited to, social, cultural, ethnic, political, religious, sexual or age

discrimination, which may, in turn, result in social exclusion.

Diversity: any characteristics, aspects or multiple elements, which differ from one another, including, but not limited to, cultural, ethnic, linguistic, religious, gender and any other type of diversity.

Interested Parties: any groups of individuals potentially bounded, affected or related to the activities developed by the Company, including, but not limited to, employees, clients, suppliers, local or traditional communities located in the surroundings of the Company's assets, governmental agencies and civil organizations.

Third Parties: representatives, suppliers, service providers, outsourced workers and any other individuals or legal entities and other commercial partners.

4. PRINCIPLES

4.1. Eneva's human rights principles:

Eneva is committed to:

- Conduct the all its operations and businesses respecting the human rights and dignity of all individuals.
- Comply and ensure the compliance with the applicable legal requirements, in conformity with legislations, rules and good practices relating to human rights, social rights and labour rights.
- Respect and promote the free trade union association and collective agreements in all areas, in conformity with applicable local legislations.
- Not tolerate, permit, participate or conduct activities that would involve any type of violation of the rights of the local communities, traditional communities, ethnic minorities and indigenous communities located in the surroundings of the Eneva's assets.
- Not tolerate, permit, participate or conduct businesses that involves any type of child labour, forced labour, mandatory or slave work.
- Not tolerate, permit, participate or conduct businesses that involves sexual exploration of children and adolescents and human trafficking.
- Request Third Parties to adopt the necessary measures to eliminate any type of child labour, forced labour, mandatory or slave work in the development of its activities.

- Request Third Parties to adopt the necessary measures to respect the free trade union association and collective agreements of employees, as well as do not accept any discriminatory practice and treat all employees with fairness, dignity and respect, in conformity with applicable labour obligations.
- Respect and promote the Diversity and do not accept any type of Discrimination or Harassment of any nature, in conformity with applicable legislation.
- Promote and maintain a safe and healthy work environment.
- Mitigate and reduce eventual impacts and violations of human rights that Eneva have caused or contributed directly, whenever identified in the operations and units, under the terms set forth in the Code of Conduct and the Code of Third-party Conduct, in addition to the provisions set forth in applicable legislation.
- Adopt educational measures to promote the respect to the human rights, in order to ensure the knowledge and practice of the principles set forth herein.
- Adopt procedures for the continuous evaluation of the human rights, in order to identify and address practices that could violate the provisions set forth in this Policy in connection with internal activities, and the activities performed by the Directors and Executive Officers, Associates or Third Parties.

5. GENERAL PROVISIONS

Eneva's Directors, Executive Officers and employees undertake to base all their relations on respect, recognizing the qualities and rights of other individuals. We always seek to work collaboratively, encouraging diversity and constructive dialogues.

The violation of the rules set forth in this Policy may imply the application of disciplinary measures or even the termination of the contractual relationship in the case of Third Parties.

6. REFERENCES

- Universal Declaration of Human Rights
- International Agreement of Economic, Social and Cultural Rights of the United Nations (UN)
- UN International Agreement of Civil and Political Rights
- Core International Labour Organization conventions (ILO)
- Guiding Principles on Companies and Human Rights
- United Nations Global Compact
- Guidelines, goals and indicators of the Sustainable Development Goals (SDGs)
- Performance Standards of the International Finance Corporation (IFC)
- **PL.CRP.CMP.002** - Code of Conduct
- **DT.CRP.CMP.008** - Code of Conduct for third parties
- **DT.CRP.CMP.006** - Third Parties relationship Guideline
- **DT.CRP.CMP.001** - Consequence management Guideline
- **DT.CRP.CMP.005** - Equal Opportunities and Respect Guideline