

REVIEW AND APPROVAL

Review	Date	Description of changes
0	02/11/2021	Creation of the document.

Creation	Review	Approval
Name: Janaina da Conceição Position: Compliance specialist Name: Luiza Torres Position: Coordinator	Name: Renato Cintra Position: Manager Audit Committee	Executive Board Board of Directors

TABLE OF CONTENTS

1. PURPOSE	3
2. APPLICATION	3
3. DEFINITIONS	3
4. PRINCIPLES	3
5. GENERAL PROVISIONS	5
6. REFERENCES	6

1. PURPOSE

This Policy aims to ensure the construction of a transparent relationship in ENEVA's supply management process, ensuring a commercial performance based on legality, safety, quality and service to socio-environmental, labor, human rights and the Competition Defense Law aspects.

2. APPLICATION

This document applies to all areas that comprises ENEVA's organizational structure, including SPEs (Special-purpose entity), joint ventures and associated companies in which the control is held by ENEVA.

3. DEFINITIONS

Competition Process: For the purposes of this document, is the process composed of at least three valid proposals of different providers.

The Eneva's supply process is composed of different types of purchases, including specific analysis, handling and approval in conformity with internal procedures.

4. PRINCIPLES

This policy defines the institutional guidelines for acquisition of Products and Services.

4.1. Criteria for selection of providers

The proposals presented by the selected providers shall be analyzed based on a previously determined set of evaluation criteria to determine the compliance with the requirements relating to ENEVA's internal processes. The Supply area shall ensure the competitiveness and, as applicable, at least three valid proposals.

The potential suppliers are selected based on the objective analysis in relation to the evaluation criteria, in conformity with Eneva's internal procedures:

- Relevant purchases and contracts are centralized by the General Procurement Management, in order to ensure a coherent relationship between ENEVA and its providers;
- Suppliers are systematically registered and must mandatorily acknowledge and accept

the Code of Conduct for Third-parties, as well as complete the integrity assessment questionnaire;

- The companies' public registrations will be taken into account in the supplier approval process.
- Suppliers selected to compete for the supply of specific goods and services may be subjected to an Integrity due diligence process, managed by the Company's Compliance area;
- non-use of slave and child labor;
- We monitor possible conflicts of interests in the process;
- We ensure the confidentiality of technical and commercial information during the purchase or contract process, limiting the disclosure of the data owners solely for internal use;
- The suppliers base is monitored based and in compliance with the relevant core principles, contained in the Code of Conduct and the Code of Conduct for Third-Parties, and specific analysis and evaluation criteria can be applied according to the degree of risk associated to each supplier;
- The service agreements are approved by the Legal Department.

4.2. Levels of Authority

The service agreements, purchases, contracts and eventual exceptions are carried out in conformity with the provisions set forth in the Bylaws, Internal Regulation of the Board of Directors, Guideline of Purchases and Guideline of Levels of Authority, as applicable. The approval of the purchase processes complies with the requirements set out in these documents, taking into account the levels of authority for approval based on the type of contract and value involved.

4.3. Agreements

Service agreements and respective General Terms and Conditions for acquisition of goods and services include anticorruption clause, ensuring the compliance and responsibility with transparency, integrity and responsibility during the effective period of the agreement.

The execution of the agreement:

- Ensure the compliance with the contractual clauses, including the monthly measurement or according to the term set forth in the agreement, as well as the evaluation of possible fines

and necessary term and/or value addition;

- Prepare and submit notices for execution of contractual terminations and application of fines;
- Request the supplier all evidentiary documents and accessories to the receipt of the material or provision of services and follow the payment guidelines as defined in the Contract Management Procedure in force.

4.4. Types of Purchases

The Company's purchase processes (purchase of materials and services contracting), including urgent contracting and small purchases, are subject to rules and, as set forth in the internal policies and procedures, may be carried out based on the competition procedures, with the limited participation of providers or through the direct negotiation with partners/suppliers, according to the Company's best interests, upon approval of the proper levels of authority, in conformity with the Guideline of Level of Authority, based on the best Governance and Compliance practices.

5. GENERAL PROVISIONS

The Purchase area will be involved at the beginning of each process related to commercial discussions or selection of suppliers.

5.1. Our commitment with compliance

- Negotiate the best commercial conditions to meet the demand, taking into account the quality, quantity and term requested;
- Analyze the commercial proposals in relation to the Total Acquisition Cost, taking into account transparency, confidentiality and appropriateness in the acquisition process;
- Analyze the scope and suggest changes, seeking alternatives for improvement, increase in competitiveness, standardization and best market practices;
- Conduct the relationship with providers with ethics, in conformity with the ENEVA's Code of Conduct and internal integrity rules;
- The offer and receipt of gifts and benefits other than the institutional gifts and benefits without commercial value is forbidden;
- ENEVA expands the suppliers base, with no restrictions due size or location, as long as they are able to offer their product or service in accordance with the needs and specifications disclosed by the Company, aligned with the administrative, financial, technical and integrity rules.

- ENEVA does not accept practices that represent or promote sexual, moral, religious, political or organizational harassment;
- ENEVA respects the diversity of sex, race, religion and sexual orientation;
- ENEVA promotes the free and fair competition among providers and the adoption of strictly ethical practices in the commercial relationship in conformity with ENEVA's Competition Protection Policy;
- ENEVA's associates involved with the purchase activities or the Purchase area shall read and understand this policy. Each associate shall ensure full compliance with this Policy;
- All ENEVA employees who carry out purchasing activities or interact with the purchasing area, have the responsibility to read and understand this policy. Each employee must ensure full compliance with this policy
- Promote the development of local providers and manage the risk of concentration.

6. REFERENCES

- **PL.CRP.CPM.002** - Code of Conduct
- **DT.CRP.CMP.008** - Code of Third-party Conduct
- **PL.CRP.CMP.003** - Anticorruption Policy
- **DT.CRP.SUP.001** - Guideline of Supplies

- **DT.CRP.CMP.002** – Guideline of Conflict of Interests
- **DT.CRP.CMP.003** – Guideline of Gifts and Benefits
- **DT.CRP.GOV.003** – Guideline of Level of Authority
- **DT.CRP.CMP.006** – Guideline of Third-party Relations