

Third-Party **CODE OF CONDUCT**



Approved by
ENEVA's Board
of Directors on
14 May 2025

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INTRODUCTION

The commitment to ethics, transparency and responsibility is non-negotiable at ENEVA. We always act in a fair, solid and inclusive manner, and corporate integrity is a fundamental pillar of our culture. **We do not accept any kind of public or private corruption in our business.**

In order to maintain this commitment, it is essential that our entire chain of suppliers, service providers, business partners, commercial clients and other agents representing Eneva ("Third Parties") share the same ethical values, conducting their business with transparency and responsibility.

ENEVA is committed to establishing partnerships with Third Parties who share the same values of ethics and responsibility, who strictly comply with applicable laws and regulations and who understand the importance of operating their businesses with integrity.

Our **Third-Party Code of Conduct** is a guide that establishes the rules and behavior expected of all our Third Parties. It reinforces the importance of ethics and transparency at all stages of conducting business and making decisions.

It is important to note that the Third-Party Code of Conduct does not cover all situations that may arise daily. However, its principles and values should serve as a reference for the conduct of all our Third Parties. ENEVA counts on the cooperation of everyone in order to create a business environment that is honest, sustainable and in line with the best market practices.

1. SCOPE OF APPLICATION

This Code applies to all Third Parties who do business with ENEVA.

The rules herein also apply to employees at all levels who work for the Third Party, including subcontractors, representatives or agents who represent the Third Party in any way or act on its behalf or for its benefit.

All Third Parties must fully understand and comply with this Code and must promote and ensure understanding of the values contained herein among their employees, to ensure that ethical principles are always observed.

2. REFERENCE DOCUMENTS

- **ENEVA Code of Conduct (PL.CRP.CMP.002)**
- Compliance glossary (DC.CRP.CMP.001);
- Consequence Management Guideline (DT.CRP.CMP.001);
- ENEVA Third Party Relations Guidelines (DT.CRP.CMP.006);
- **Competition Protection Policy (PL.CRP.CMP.005);**
- **Human Rights Policy (PL.CRP.CMP.004);**
- **Anticorruption Policy (PL.CRP.CMP.003);**
- **Policy of Disclosure of Material Act or Fact, Secrecy Preservation and Trading of Securities (PL.CRP.RIN.001);**
- **Related Party Transactions Policy (PL.CRP.GOV.001);**
- ENEVA's Conflicts of Interest Directive (DT.CRP.CMP.002).

3. APPLICABLE LAWS AND COMPLIANCE

Third Parties must fully comply with applicable legislation, including, but not limited to, Anti-Corruption Laws, labor, fiscal, tax, environmental and data protection laws, including all the Brazilian regulations applicable to ENEVA, those of the Third Party's origin country and those of the countries where they do business, in addition to observing international conventions, guidelines and best practices established by international bodies such as the United Nations ("UN") and the Organization for Economic Cooperation and Development ("OECD").

In the event of a conflict between applicable standards, third parties shall adopt the standard with the most restrictive requirements.

4. ETHICS AND INTEGRITY



ANTI-CORRUPTION

ENEVA does not tolerate any act aimed at obtaining an Undue Advantage for commercial or private purposes, or for the benefit of Third Parties. The Third Party must reject any form of Corruption, direct or indirect, public or private, fraud, bribery, favoritism, influence peddling, extortion and kickbacks in the relationships it establishes for itself, for its employee, or through its partners.

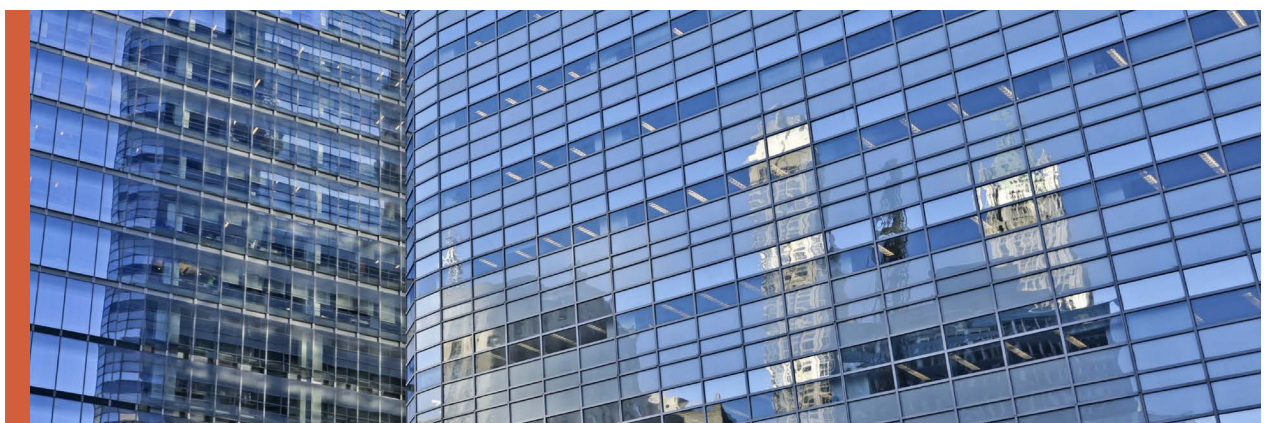
Examples of situations that may constitute an Undue Advantage:

- Gifts;
- Hospitality, entertainment and travels;
- Asset loans;
- Free consultancy;
- Inside information or job opportunities;
- Donations or political contributions.

Third Parties must comply with Anti-Corruption Laws, preventing any of their partners, shareholders, directors, employees, service providers or any Third Party, acting on their behalf, from being incurred in illegal acts provided for in such rules

The Third Party is expected to have rules or codes of conduct appropriate to its size and applicable to its partners, employees, agents and representatives in any position. Whenever possible, it is also recommended to have integrity programs in line with the best market practices and the requirements of Brazilian legislation, the origin country or the country in which the business operates. Read more: [Anti-corruption policy](#).

ENEVA does not tolerate any act aimed at obtaining an Undue Advantage for commercial or private purposes, or for the benefit of Third Parties.





INTERACTION WITH PUBLIC AUTHORITIES

ENEVA does not allow any interaction between Third Parties and Public Officials to be carried out on behalf of the Company without specific authorization.

Authorized Third Parties must adopt careful measures when interacting with Public Officials, conducting these meetings transparently and ethically, preferably at the agency's headquarters, documenting the interactions and not offering anything that could be perceived as or consist of an Undue Advantage.

The representatives of the authorized Third Parties will be individually subjected to Integrity Due Diligence.

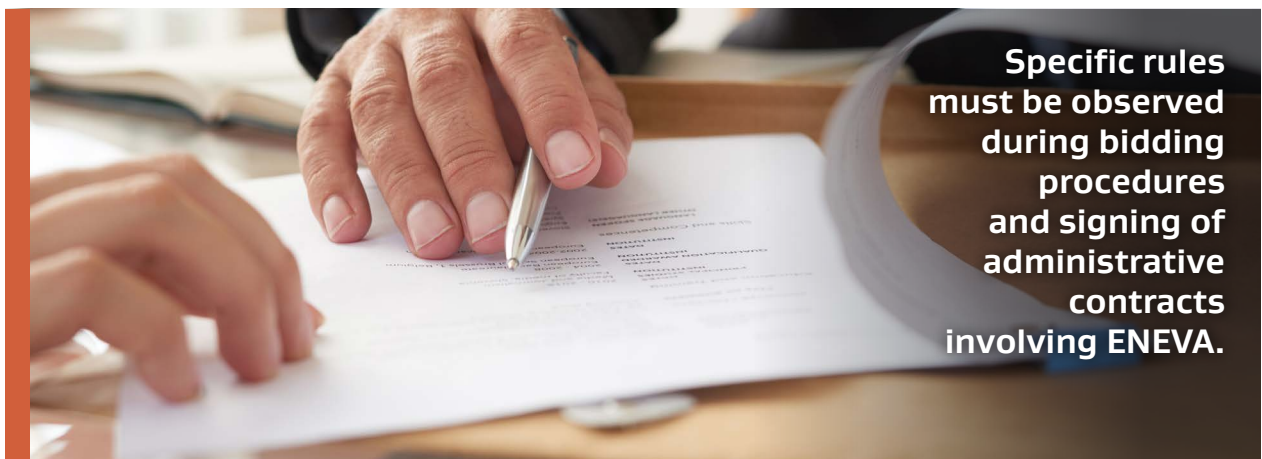


PUBLIC BIDDING AND ADMINISTRATIVE CONTRACTS

Specific rules must be observed during bidding procedures and signing of administrative contracts involving ENEVA.

ENEVA considers as improper conduct:

- Frustrating or defrauding the competitive nature of a public bidding procedure;
- Preventing, disturbing or defrauding the performance of any act of a public bidding procedure;
- Removing or seeking to remove a bidder by means of fraud or offering an advantage;
- Defrauding public bidding or contracts arising from them;
- Fraudulently or irregularly creating a legal entity in order to participate in a public bidding or enter into an administrative contract;
- Obstructing or interfering with the investigation or inspection of Public Officials, public bodies or institutions, including within the scope of regulatory and inspection agencies.



Specific rules must be observed during bidding procedures and signing of administrative contracts involving ENEVA.



GIFTS, PRESENTS AND HOSPITALITY

Gifts, Presents and Hospitality or privileges of any kind or nature may not be given or offered to Employees or their relatives as a result of their relationships with Third Parties. Only Gifts that are offered for legitimate business purposes are allowed. Third Parties are not allowed to offer Gifts, Presents and Hospitality on behalf of ENEVA.

Special care must be taken with Public Officials. ENEVA does not allow Gifts, Presents and Hospitality of any value to be offered to Public Officials in the name of the Company. The Company does not tolerate, under any pretext, that these acts are carried out with the aim of speeding up the execution of services under contractual obligations.



DONATIONS AND SPONSORSHIPS

Third parties are not allowed to perform donations or sponsorships on behalf of ENEVA, unless they are expressly contracted for that purpose, either to provide services, acquire goods, or broker such acquisitions and always in accordance with ENEVA's Third Party Contracting Policy.

ENEVA does not allow Third Parties to perform political donations or sponsorships on behalf of the Company under any circumstances.



PUBLIC AND POLITICAL ACTIVITIES

Third Parties are strictly prohibited from engaging in any form of political publicity or attempting to exercise political influence in the context of their relationship with ENEVA, whether on Company facilities or in locations where the Company performs its services.

The exercise of public or political office, as well as the involvement of partners, managers, or employees classified as Politically Exposed Persons (PEPs) in business relationships with the Company must be disclosed at the time of the Third-Party registration and contracting.

After starting the relationship with ENEVA, if there are changes in the personnel of the Third Party, including or excluding employees, partners (or their family members) or subcontractors who are considered PEPs and who are involved in the business relationship with ENEVA, these changes must be communicated to ENEVA as soon as possible in order to duly update the register of the Third Party.



MEDIA AND PRESS RELATIONS

Third Parties are prohibited from providing information or statements to the press on behalf of ENEVA, unless authorized or contracted directly for this purpose. The sharing of Company information on private social networks, such as LinkedIn, Instagram, Twitter and Facebook, is also prohibited, unless authorized by ENEVA's Communication Department.

5. TRANSPARENCY IN BUSINESS



INTEGRITY DUE DILIGENCE AND HIRING OF THIRD PARTIES

ENEVA is transparent in its contracting process and does not contract or do business with Third Parties that do not comply with its ethical standards.

Contracts are preceded by Integrity Due Diligence, which is always formalized in accordance with ENEVA's Third Party Relations Policy.

Depending on the scope of the contract and the particularities of the Third Party, such as its size, structure and resources, ENEVA may adapt or reduce the scope of Integrity Due Diligence, at the exclusive decision of ENEVA's Compliance area.

All contracts with Third Parties will have an anti-corruption clause compatible with their purpose and with the provisions of the legislation applicable to the contract.

ENEVA may ask Third Parties about information relating to possible investigations and proceedings involving the Third Party, as well as require the inclusion of a contractual clause that allows ENEVA to monitor Third Parties during the execution of the contract.

Third Party must:

- ✓ • Be transparent and act in good faith when providing information or sending documents to ENEVA;
- ✓ • Report any potential Conflicts of Interest with ENEVA;
- ✓ • Indicate whether the Third Party interacts with Public Officials and the number of PEPs on their staff;
- ✓ • Adhere to and comply with ENEVA's standard anti-corruption clause;
- ✓ • Adhere to and comply with the Code during the contractual relationship with ENEVA;
- ✓ • Provide all the necessary information for quoting, contracting, purchasing and managing products and services;
- ✓ • Commit to the truth of the information provided to ENEVA;
- ✓ • Describe in detail and demonstrate the services provided and the products supplied;
- ✓ • Agree to have their performance monitored and their activities audited, either by ENEVA or by individuals or organizations that the Company authorizes to do so.



CONFLICTS OF INTERESTS

ENEVA does not allow Third Parties to be involved in situations that expose them to Conflicts of Interest. Third Parties must immediately notify ENEVA of any Conflicts of Interest situation, whether actual or potential, so that they can be assessed and resolved.

Conflicts of Interest can generate financial and reputational damage for all those involved and can arise from:

- Economic or financial interests in competitors, customers, distributors or suppliers, to the extent that they may influence or appear to influence actions taken on behalf of ENEVA;
- Personal relationships with ENEVA Employees that may influence the selection of the Third Party by ENEVA;
- Personal relationships with Public Officials who can influence business for ENEVA.

Here are some real-life scenarios that should be reported as potential conflicts:

- I'm negotiating a contract with ENEVA, but I have a relative who works for a company that competes with ENEVA;
- I'm negotiating a contract with ENEVA and someone in my company has a personal relationship with an ENEVA Employee;
- I am formalizing a contract with ENEVA and I have a close relationship with a Public Official with whom ENEVA interacts in the context of its business.

For more details, always consult **ENEVA's Conflicts of Interest Policy**.

ENEVA does not allow Third Parties to be involved in situations that expose them to Conflicts of Interest.



ACCOUNTING RECORDS AND FINANCIAL RECORDS

Third Parties are required to implement appropriate and adequate measures to **ensure the integrity and reliability of their accounting and financial records**, in accordance with their size, sector of activity, capabilities and resources.



MONEY LAUNDERING

It is Third Parties responsibility to adopt **measures to prevent and oppose any form of Money Laundering**.

ENEVA does not make any kind of payment in cash for services or goods supplied.

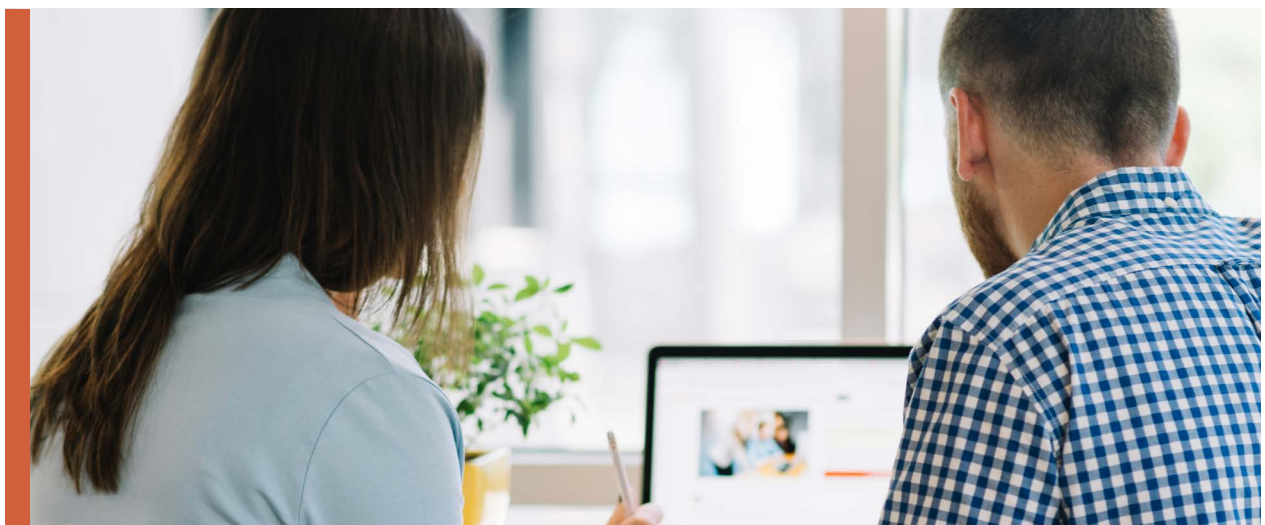


FREE COMPETITION

ENEVA is fully committed to **free and fair competition in all markets** and does not tolerate any type of antitrust activity by Third Parties. When interacting with competitors, Third Parties must act transparently, ensuring that no improper conduct is practiced and that no information received or shared can be interpreted as a violation of antitrust laws.

Third Parties must refrain from any anti-competitive practice or unfair competition. The sharing of sensitive ENEVA information, the combination of prices or commercial conditions with competitors, as well as any other conduct that may constitute a cartel practice or competitive infringement is expressly prohibited.

Third Parties are responsible for knowing and training their employees and ensuring compliance with antitrust rules. Read more: [Antitrust Policy](#).





CONFIDENTIAL INFORMATION

Third Party is prohibited from disclosing or accessing any insider information, confidential document or personal data of ENEVA that is not related to the execution of the contract.

Third Party must refrain from sharing ENEVA information beyond what is necessary to conduct the business, guaranteeing the confidentiality and secrecy of the information received.

ENEVA is a publicly traded company and is subject to the rules of the Brazilian Capital Market. Therefore, any disclosure of information related to the Company must comply with its Policy for Disclosure of Material Acts or Facts and Trading in Securities, and ENEVA's prior authorization, compliance with best corporate governance practices and the maintenance of confidentiality regarding relevant information are indispensable.



ECONOMIC SANCTIONS

ENEVA does not do business with Third Parties that are sanctioned or that have relations or business with a country, group, entities or individuals subject to economic sanctions.



PRIVACY AND DATA PROTECTION

ENEVA is committed to complying with the data protection laws of the countries in which it operates and to respecting the privacy of all individuals with whom the Company has any kind of relationship.

Third Parties must follow the rules on personal data protection and information security applicable to information accessed as a result of their relationship with ENEVA.

Personal data is any information related to an individual or information which allows the identification of the individual, such as name, ID number, localization data, IP address.

Third Parties must collect, use, disclose, store or process personal data only to the extent necessary to meet the purposes of their relationship with ENEVA. The processing of personal data must be carried out by Third Parties in a lawful and ethical manner, guaranteeing the privacy of data subjects and compliance with data protection laws and the contractual obligations assumed with ENEVA.

To ensure compliance with applicable legislation, including but not limited to the Brazilian General Data Protection Law (LGPD), all contracts entered by ENEVA with Third Parties will contain specific data protection clauses.

6. RESPONSIBLE MANAGEMENT AND RESPECT

ENEVA expects its Third Parties to treat all people with respect and dignity, in compliance with applicable legal requirements and standards related to human rights, labor and environmental legislation.



HARASSMENT AND DISCRIMINATION

ENEVA does not tolerate, allow or condone any discriminatory or prejudicial acts by Third Parties, including distinction, exclusion or preference that constitute harassment or discrimination based on physical, sexual, racial, moral, gender, age, disability, nationality, ethnic origin, religion or belief, political position, sexual orientation or identity, race or color, marital status, family situation, union membership or any other condition protected by Brazilian law.

Third Parties are expected to promote an inclusive environment, value diversity and act in accordance with the principles of equal opportunities, respect and non-discrimination, ensuring an ethical and respectful relationship with their employees and all parties with whom they interact. Discriminating against or harassing any employee will not be tolerated.



SLAVERY LABOR, CHILD LABOR, SEX TRAFFICKING AND SEXUAL VIOLENCE

Third Parties are responsible for rejecting and opposing any form of slavery labor, as well as any child labor as defined in the applicable legislation.

Third parties are not allowed to employ:

- Under 18s in dangerous or unhealthy activities;
- Under 16s in any job, except as an apprentice, from the age of 14.

Third parties are obliged to ensure that the work carried out by their employees and any contractors or subcontractors is voluntary, free and without coercion. Under no circumstances shall Third Parties engage in forced labor, exhausting working hours, degrading conditions, or restrict workers' freedom of association. ENEVA encourages Third Parties to adopt measures to prevent this type of practice in their supply networks, especially in logistics and port operations.

Any kind of sexual abuse or exploitation of children and teenagers by Third Parties or Third-Party contractors during the execution of the contract with ENEVA is strictly prohibited. Sexual abuse includes, but is not limited to, solicitation or provision of escort services, grooming, requests for or exchange of sexual favors, child pornography, or accommodation of children and teenagers for such purposes.



REMUNERATION, FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Third Parties must ensure that the salaries and benefits paid to their employees comply with the applicable labor, social security and tax obligations and the rules set forth in the collective labor agreement for the category.

In addition, Third Parties must respect the right of their workers to form and join trade unions, as well as to bargain collectively, ensuring that there is no reprisal arising from this action.



WORKING CONDITIONS, HEALTH AND SAFETY RISKS

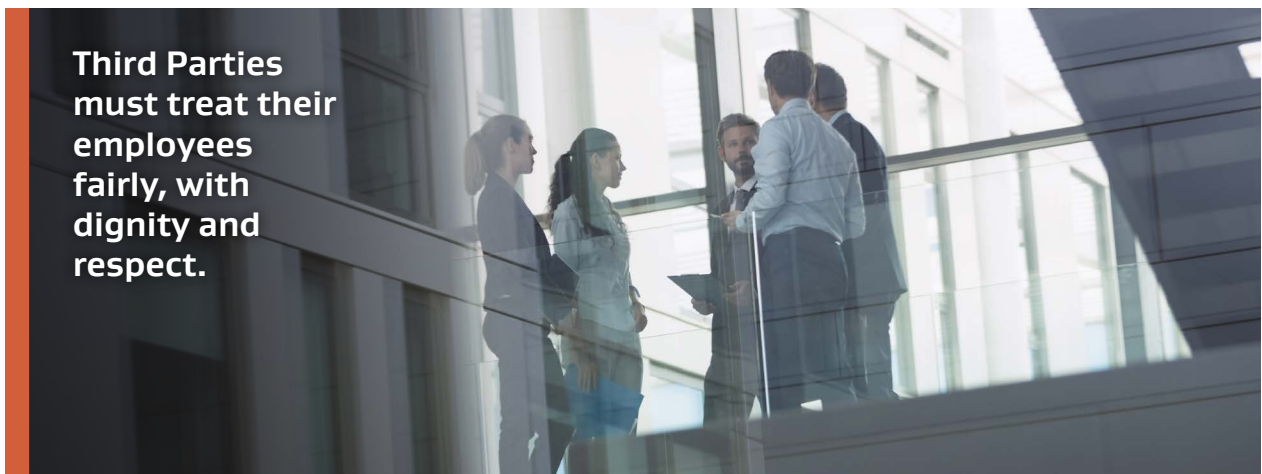
Third Parties must treat their employees fairly, with dignity and respect, and must offer their employees a workplace free from hostile and inhumane treatment, sexual harassment or abuse, bullying, physical punishment or torture, physical coercion or verbal abuse.

Third parties must provide health and safety conditions in their workplace, in compliance with the applicable laws and the requirements established by ENEVA and must continuously seek to improve their procedures and those of their employees regarding the safety of their operations, activities and facilities. These practices must mitigate risks to society and preserve the physical integrity of its employees and the population, as well as guaranteeing a permanent commitment to the value of "Safety".

All Third Parties must have adequate controls, work safety procedures, preventive maintenance and technical protection measures to mitigate health and safety risks in the workplace. In addition, they must have effective health and safety programs in place, in accordance with the applicable regulations.

It is forbidden for any Third Party to fulfill the object of the contract with ENEVA under the influence of any type of narcotic substance or alcohol. Read more: [Human Rights Policy](#).

**Third Parties
must treat their
employees
fairly, with
dignity and
respect.**





SUSTAINABILITY AND PROTECTION OF THE ENVIRONMENT

ENEVA promotes the conservation and protection of biodiversity and does not tolerate initiatives that promote deforestation or the conversion of native lands for commercial purposes, in disagreement with the applicable legislation.

ENEVA expects that Third Parties recognize the environment as a resource for the survival of society and, therefore, conduct their business and activities with social and environmental responsibility. Third Parties must treat and encourage the sustainable use of natural resources seriously and without waste, seeking to preserve the environment and comply with Brazilian legislation.

It must be a priority for Third Parties to adopt the highest standards of environmental protection in order to minimize the risks and impacts of their activities.



RELATIONS WITH COMMUNITIES

It is essential that Third Parties know and respect all legislation applicable to the rights of traditional communities, such as indigenous people and *quilombolas*, especially with regard to preserving and respecting their legally constituted territories.

Third Parties are prohibited from interacting with local communities on behalf of ENEVA, except with express authorization and in the presence of at least one Company Employee.



ENEVA promotes
the conservation
and protection of
biodiversity.

7. COMPLIANCE WITH THE THIRD-PARTY CODE OF CONDUCT

ENEVA reserves the right, at any time, directly or with the support of Third Parties, to carry out inspections, assessments, investigations and audits, including visits to the Third Party's facilities, with the aim of verifying full compliance with this Code and the commitments set out in it.

The integrity structures and internal controls adopted by Third Parties may be assessed by ENEVA's Compliance team during the Integrity Due Diligence stage, ensuring that they are proportionate and appropriate to the best market practices and the specificities of the Third Party, such as its size, structure and resources.

All Third Parties are obliged to comply with this Code and must contractually adhere to it. If any non-conformities are identified that indicate non-compliance with any of the commitments of conduct out herein, the Third Party must take the necessary steps to correct them within the period stipulated by ENEVA, regardless of the application of contractual sanctions.

By accepting this Code, Third Parties acknowledge that their non-compliance may allow ENEVA and its companies to adopt appropriate measures, including legal actions for possible compensation and the application of Disciplinary Measures, in accordance with the Consequence Management Guideline, which may result in termination of the contractual relationship.

8. I HAVE DOUBTS ABOUT THIS CODE, WHAT SHOULD I DO?

Whenever Third Parties have doubts about the meaning, application, scope or comprehensiveness of any rule contained in this Code, they should **contact ENEVA's contracting area or purchasing area for advice.**

Third parties may contact ENEVA's Compliance team by e-mail: compliance@eneva.com.br



9. SAFE LINE, ENEVA'S REPORTING CHANNEL

If the Third Party or its employees, in the context of the business relationship with ENEVA, notice non-compliance with the terms set forth in this Code or that ENEVA or its professionals are not acting in accordance with their own Code of Conduct, it is essential that they inform ENEVA of the non-compliance situation.

All Third Parties must freely express their concerns and immediately report any behavior or situation that may conflict with this Code or that violates ENEVA's policies or the applicable laws.

Third parties may communicate their concerns and potential non-compliance through ENEVA Safe Line, accessible by the following channels:



On the website
<https://contatoseguro.com.br/eneva>



Phone
0800 601 8679

If the Whistleblower prefers not to identify him/herself, ENEVA will guarantee their anonymity. In all cases, the identity of the Whistleblower will be kept as confidential. If requested, the Whistleblower will be informed of the progress of their complaint.

ENEVA does not adopt or tolerate any form of retaliation or discrimination by the Third Party against those who express concerns about the issues addressed in this Code or report suspected violations of the Company's guidelines in good faith.

In the cases received by the Whistleblowing Channel involving Third Parties, ENEVA's Compliance area will determine the relevance and adequacy of its own investigation efforts, considering the impact on the business. If the internal investigation is deemed inappropriate, ENEVA will send notification to the Third Party's Compliance Department or, in its absence, to the Contract Manager for proper investigation and adoption of the appropriate measures. At the end of the investigation, if a disciplinary fault is found, Third Party must report the measures taken to ENEVA's Compliance Department.

Third Parties are expected to provide reporting channels appropriate to their size, capacity and resources, ensuring that their employees can report suspicions or potentially illegal practices.



10. DEFINITIONS



Public Official

Any official, political agent, candidate for any political office, civil servant and public servant, belonging to the direct or indirect public administration of any of the branches of government of the Union, the States, the Federal District, the Municipalities, of any company included in the public patrimony or of any entity to the creation or financing of which the Treasury has contributed or with more than fifty percent of the patrimony or annual revenue, even if in the temporary exercise of an office or function and without remuneration. For this purpose, the term "public official" includes both national and international public officials.

Examples: mayors, governors, secretaries, ministers, councilors, deputies, regulatory agency technicians, customs officials, inspectors, judges, employees of companies controlled by the public administration, such as Caixa Econômica Federal, BNDES, Petrobras, among others.



Gift

Any item with no or little commercial value that is generally distributed as a courtesy, for advertising, for regular publicity, or for special events or commemorative occasions.

Examples: pen, diary, calendar or mug with the company logo.



Whistleblowing Channel

Independent and secure environment through which the Company receives, records and manages communications, anonymous or not, of reports about facts or acts that violate the laws, the Code of Conduct and ENEVA and its subsidiaries' policies.



Employees

Members of the Board of Directors and its advisory committees (whether statutory or not), members of the Audit Board, directors, employees, trainees and outsourced workers of ENEVA and its subsidiaries.



Conflict of Interest

A situation in which a person's **independence or impartiality** in a company decision-making process is compromised due to personal interests. This may occur when that person has the power to decide, influence or direct a result that may directly or indirectly benefit him or herself, a member of his or her family or a Third Party with whom he or she has a relationship, or when his or her decisions are driven by his or her own interests that diverge from the Company's objectives, which may compromise his or her integrity and transparency.



Corruption

Offering, promising, requesting, giving, accepting, receiving, transferring, subsidizing, agreeing to grant, financing, funding, sponsoring anything of value, directly or indirectly, to any Public Official or to a person related to them, any Undue Advantage for commercial or private purposes or for Third Parties. The concept of corruption includes all acts harmful to the Public Administration provided for in the Anti-Corruption Legislation.



Private Corruption

Any form of **offering or receiving an Undue Advantage** in relations between Third Parties, companies or individuals in the private sector, without the direct involvement of Public Official.



Whistleblower

The **person who reports potential fact(s) or act(s) that violate the laws**, the Code of Conduct and the policies of ENEVA and its subsidiaries to the Whistleblowing Channel.



Integrity Due Diligence

Process of assessing reputation, history of conduct ethics, regularity of incorporation, as well as other applicable and necessary requirements for measuring the risk associated with Third Parties.



Disciplinary Fault

Action or omission considered irregular, illicit or illegal and subject to the application of a Disciplinary Measure, according to the severity and parameters established by law and ENEVA's internal rules.



Hospitality

Includes the **provision of services or expenses** for travel, meals, accommodation, transportation (air, sea or land), courses, seminars, congresses, fairs, industry events or entertainment, the latter provided are sponsored by the Company or by Third Parties.



Investigation

Internal investigation procedure designed to determine the existence of a disciplinary offense.



Money Laundering

The act of concealing or disguising the nature, source, location, disposition, movement, or ownership of assets, rights, or values derived from a criminal offense, such as acts of corruption. It is a crime that seeks to conceal or disguise relevant information about the origin or location of an asset or the source of value derived from another crime or offense.



Anti-Corruption Legislation

All Laws, Decrees, Ordinances and Instructions that seek to prevent irregular conduct such as fraud, corruption and other illicit practices, in particular the Brazilian Anti-Corruption Law (Law No. 12.846/2013) and Federal Decree No. 11.129/2022, the Brazilian Criminal Code (Decree-Law No. 2.848/1940); the Administrative Improbity Law (Law No. 8.492/1992 and Law No. 14.230/2021); the Anti-Money Laundering Law (Law No. 9.613/1998 and Law No. 12.683/2012); the Public Procurement Law (Law No. 8,666/1993 and Law No. 14. 133/2021); the Law on Offences Against the National Financial System (Law No. 7.492/1986), the Law on Criminal Organizations (Law No. 12.850/2013), the Antitrust Law (Law No. 8.884/1994 and Law No. 12.529/2011); the US Foreign Corrupt Practices Act (FCPA), the US Foreign Extortion Prevention Act (FEPA), the UK Bribery Act (UKBA), the rules established by the member and signatory states that make up the OECD Convention on Combating Bribery of Foreign Public Officials; as well as laws, decrees, regulations and other normative acts issued by governmental authorities with applicable jurisdiction, related to this matter.



Disciplinary measure

A measure that can be applied to employees or third parties as a result of a finding of disciplinary misconduct.



Politically Exposed Person (PEP)

As defined in COAF Resolution No. 40 of November 22, 2021.



Presents

Any good or service for personal use or benefit has commercial value and cannot be included in the definitions of Gifts or Hospitality.



Third parties

Anyone who enters into a business, commercial or partnership relationship with any company controlled by or under common control with ENEVA. This includes, but is not limited to, suppliers, service providers, intermediaries and business partners.



Undue Advantage

Any form of payment, whether monetary or by any other mechanism, intended to obtain an advantage in relations with its stakeholders, such as Third Parties and Public Official, or with any person related to them. The concept includes the exchange of favors or the guarantee of obtaining benefits or rights, even if they are owed to ENEVA.

