

Alupar Corporate Policies

Sustainability Policy



ALUPAR

July 1, 2020

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Prepared by:

Sustainability Committee

Sustainability Committee

Reviewed by:

Sustainability Committee

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Approved by:

Board of Directors on

Standardized by:

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Project and Process
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Alupar Corporate Policies

Sustainability Policy

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1 CONTROL INFORMATION

VERSION	DATE	TYPE OF REVIEW	BREAKDOWN
01	July 7, 2020	New	Creation of a new policy.
06			
07			
08			
09			
10			
11			
12			

Types of Revision

- **Inclusion:** New information that did not exist in the previous version.
- **Exclusion:** Removal of information from the previous version.
- **Modification:** Changes or adjustments to information from the previous version.
- **New:** Indicates that a new norm was created, which corresponds to the first version of the document.



2 OBJECTIVE

The Sustainability Policy aims to establish Alupar's operating guidelines and the continuity of its businesses through social and environmentally responsible actions, as well as guiding relationships with suppliers, customers, government agencies, shareholders and communities.

The Policy aims at the sustainable development of the organization, human well-being and reducing social and environmental impacts caused by its activities and internal operations.

3 SCOPE

This policy applies to all departments and employees of companies under Alupar Invertemento S.A., at all hierarchical levels.

In the event that new concessionaires are incorporated, or if new companies are established, these guidelines will also become effective for said concessionaires and/or companies.

4 APPLICABILITY

All of the Company's departments must comply.

5 EFFECTIVE TERM

This document, as well as the Company's other normative documents, will be valid for 12 months from the date of its publication.

If the validity expires without a due validation of the departments, the document will be considered as updated and will be republished with the new date and the name of the person responsible for the process.

6 CONCEPTS / DEFINITIONS

CONCEPTS	DEFINITION
Global Reporting Initiative - GRI	An independent international organization, pioneer in Sustainability Reports and standards widely adopted by companies, governments and other organizations.
Sustainable Development Goals - SDG	A set of 17 Objectives and 169 universal, integrated and indivisible goals, established by the United Nations General Assembly in 2015, where global leaders collectively committed, through a broad and universal agenda, that such goals should be implemented by 2030, with the challenge of creating



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	a path towards a collective and sustainable global development with beneficial cooperation among all those involved.
United Nations - UN	An international organization formed by countries that have come together to voluntarily work for world peace and development.
Conventions of the International Labour Organization (ILO)	A multilateral agency of the United Nations, specializing in labor issues, especially in terms of compliance with international standards.
Stakeholders	Individuals and organizations that can affect, or be affected, by a project or company, either directly or indirectly, positively or negatively.
Sustainability	The ability to meet the economic, social and environmental needs of the current generation while ensuring the ability to meet the needs of future generations. A development model that does not deplete resources for the future.

7 REFERENCES

- ISO 14001 – Environmental Management System;
- ISO 26000 – Social Responsibility;
- Conventions of the International Labour Organization (ILO) (Conventions 29, 87, 98, 100, 105, 111, 138, 169 and 182);
- GRI - Global Reporting Initiative;
- Global Compact of the United Nations (UN);
- Universal Declaration of Human Rights / International Covenant on Economic, Social and Cultural Rights;
- UN Guidelines on Business and Human Rights - 2011;
- UN Sustainable Development Goals - 2030 Agenda;
- Code of Ethics, Conduct & Compliance;
- Integrity Policy; and
- Corporate Governance Policy.

8 REGULATORY BACKGROUND



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ANEEL Resolution 444, of October 26, 2001, and subsequent amendments - Annual Social and Environmental Responsibility Report.

9 GENERAL GUIDELINES

The Company seeks to meet the needs of the current generation, without compromising the capacity of future generations. Our social commitment to sustainable development aims at respecting the communities involved in our projects, minimizing negative impacts and enhancing positive effects; which are guided by the following principles:

9.1 CONSIDERING SUSTAINABILITY ISSUES WHEN MAKING DECISIONS

Analyze environmental, social and economic issues associated with all phases (planning, development, implementation and operational) of our business activities in order to guide our decision-making process.

9.2 GOOD PRACTICES REPORT

Fostering the adoption of good environmental practices and encouraging innovative ideas aimed at the rational use of natural resources, preventing environmental degradation in all activities and improving the efficiency of operational processes.

9.3 RESPONSIBLE SOCIAL AND ENVIRONMENTAL MANAGEMENT

Adoption of an integrated management system in which the impacts of activities are managed in a preventive manner, seeking to minimize environmental and social risks associated with our operations.

9.4 PERFORMANCE MONITORING

Encourage critical analysis and adoption of innovative approaches that collaborate with the ongoing improvement of our performance.

9.5 COMPLYING WITH LEGISLATION

Commitment by all employees to comply with current legislation and regulations applicable to the Company's activities and other voluntary commitments in the locations where our projects are located.

9.6 COMMUNICATION WITH RELATED PARTIES

Valuing the participation of stakeholders by establishing transparent communication channels and in accordance with the culture of the communities located in the areas where we operate.



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9.7 REDUCING CARBON EMISSIONS

Commitment to reducing carbon emissions in the activities associated with our operations.

9.8 EXTENSION OF THESE PRINCIPLES TO SUPPLIERS

Extension of the principles of this Sustainability Policy to our suppliers and service providers.

10 RESPONSIBILITIES

RACI MATRIX		
Activities	ALL EMPLOYEES	SENIOR MANAGEMENT
Implement and apply the guidelines set out in the policy.	R	
Use of pre-established guidelines in business transactions.	R	
Dissemination of a sustainable culture by Alupar's management/administrators.		R
Foster innovation initiatives and encourage the implementation of sustainable actions aimed at aligning them with the Company's business strategies.		R

R = responsible (responsible for the execution) / A = approver (approves the work) / C = consultant (provides additional information to complement the work) / I = informed (person to be informed)

11 ATTACHMENTS

Not applicable.

12 APPROVALS

Aiming to ensure sustainability, all approvals and revisions of these documents will be duly confirmed by e-mail with the person responsible for the processes and departments involved, and such person will





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also be responsible for requesting all approvals and sending the confirmation to the Project and Process Management Office.

13 DISCLOSURE

The department is responsible for disclosing and ensuring the understanding of the information.



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