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## **MESSAGE FROM THE LEADERSHIP**

### **Welcome to Órigo!**

Here, we believe that energy goes far beyond what reaches your electricity bill. It's present in our actions, in the way we build relationships, and in the positive impact we create every day.

Being part of Órigo means committing to transforming Brazil's energy market by expanding access to renewable solutions in a simple, transparent, and sustainable way. This is the purpose that drives us and it only becomes reality when each member of our team acts with responsibility, collaboration, and integrity.

The Code of Conduct you now hold is the compass that guides our choices and ensures that our growth always aligns with our values. It's more than just a document: it's a collective commitment to act with ethics, responsibility, and transparency, reflecting the kind of company we seek to be.

Therefore, I invite you not only to read and sign this Code, but to live it every day, inspiring colleagues, clients, and partners. Together, we will continue to build a stronger, more innovative, and more human Órigo.

**Aurelio Bustilho de Oliveira**

## 1. PRESENTATION AND APPLICABILITY

This Code of Conduct ("Code") is the fundamental milestone of Órigo's Integrity Program and expresses our commitment to **ethics and transparency**, containing objective rules related to the need for compliance and knowledge of the legislation and regulations in force, in particular, the rules for the protection of the company's confidential information, the fight against corruption, in addition to the company's policies, observing all legislation in force, especially Law No. 12,846/2013 and Decree No. 11,129/2022 (together, "Anti-Corruption Law"), Law No. 8,137/1990 ("Law of Crimes Against the Tax Order"), Law No. 8,429/1992, enacted by Law No. 14,230/2021 (together, "Administrative Improbability Law"), Law No. 14,133/2021 ("Bidding Law") and Law No. 12,529/2011 ("Competition Law").

This Code of Conduct is a guide for our actions, compiling the way we make our decisions and act in our business and is applicable to all those who relate to or carry out activities on behalf of Órigo, such as: employees, interns, officers and members of the Board of Directors ("Employees"), as well as suppliers, third parties, representatives and business partners.

Our leaders have the role of knowing, applying and disseminating the precepts of this Code and ensuring that their teams also do so, refraining from practicing any conduct that may be characterized as abuse of power. Complying with such practices allows us to make decisions that support our core goal – to attract and retain loyal and satisfied customers.

It is important to note that Órigo does not tolerate any corrupt practices, such as bribery, embezzlement, extortion, illegal agreements, facilitation payments or any action or omission that may violate the aforementioned laws and decrees, or foreign laws, such as the *Foreign Corrupt Practices Act* ("FCPA"), of the United States, and the *UK Bribery Act*, of the United Kingdom. as applicable.

This document was submitted to the Board of Directors and duly communicated internally and externally.

## 2. OUR VISION, MISSION & VALUES

Our vision: To make the consumption of renewable energy massive in Brazil.

Our Mission: To lead the transformation of the country's renewable energy market

We have a clear vision that renewable energy should be an affordable choice for more and more homes and businesses in the country, so our mission as a company is to lead this transformation in the market.

We work to be the leading renewable energy company in Brazil, recognized for initiating changes in the sector and creating innovative solutions for our customers. We are oriented towards the delivery of reliable, sustainable, technological and affordable services.

We value the human and professional development of each one, through appropriate practices and policies for wages and benefits, in addition to the promotion of occupational safety and health programs.

We believe that attitudes based on high ethical and behavioral standards, respecting pluralities, our customers, suppliers and the communities in which we operate attract talent and create innovative services.

Our values are:

### 2.1. FOCUS ON RESULTS

We are clear about where we want to go and we act towards the same goals, ensuring that the results are achieved.

## **2.2. CUSTOMER SATISFACTION**

All our decisions are directed towards the satisfaction of our customers. We are committed to a high-level experience, with personalized and agile service that generates value and makes life easier for our customers.

## **2.3. COLLABORATIVE AUTONOMY**

We believe in our business and have the autonomy to make it happen. We wear the shirt, act with passion and feel part of something bigger. We want to see the business grow and, for that, we take care of each delivery, each resource, each process and, above all, each relationship.

## **2.4. INNOVATION**

We are pioneers in our segment and we are always looking for new ways of thinking and acting, aiming to overcome challenges in an agile, new and disruptive way. Our actions are guided by creativity, critical thinking, resilience and collaboration, with results that break patterns. We are nonconformist by nature.

## **2.5. ETHICAL AND SUSTAINABLE BEHAVIOR**

We base our relationships and decisions on transparency, ethics, responsibility, trust and respect for people, society and the planet. Our choices are always made seeking a positive impact, whether on society or the environment.

# **3. INDOORS: RELATIONSHIPS BETWEEN TEAM MEMBERS**

## **3.1. PROMOTING DIVERSITY: COMBATING DISCRIMINATION AND HARASSMENT**

We do not tolerate acts of discrimination or harassment of any kind. Any and all cases of harassment and discrimination will be promptly investigated, dealt with and the appropriate disciplinary measures provided for in this document, according to chapters 10.

We encourage and believe in diversity, such as, but not limited to, diversity of gender, ethnicity, class, economic status, sexual orientation, age, religious beliefs, politics, marital status or any other.

We believe that everyone should be treated equally and we curb any discriminatory act, in order to create an egalitarian environment.

As a way to encourage the diversity and well-being of our Employees, we implement affirmative vacancies in the recruitment and selection processes (for example, vacancies for women, black people, PWDs), in addition to extended maternity and paternity leave programs, internship programs and young apprentices, as we believe in inclusion at every moment of each Employee's life.

We also ensure that in the recruitment, selection and promotion processes, each individual is evaluated exclusively by their conditions to meet and adapt to the expectations of the position, always stimulating the multiplicity and individuality of each one.

Therefore, our team is designed and composed of a plurality of people, with different genders and ethnicities, countless age groups, people with disabilities, fathers and mothers, among others, because we believe that diversity happens in practice.

### **3.1.1. Discrimination**

Discrimination is considered to be the differential treatment of an individual or group based on any attributes or characteristics, as well as the impertinent, repeated, abusive insistence, persecution, suggestion or pretension in relation to someone, which can be classified as moral or sexual.

### **3.1.2. Harassment**

Harassment is considered to be the impertinent, repeated, abusive insistence, persecution, suggestion or pretense to disqualify, humiliate, inferiorize and despise someone, which can be classified as moral or sexual and results in the embarrassment of the person, their work and their self-esteem.

Harassment can be verbal or physical aggression or in a subtle, veiled or covert way.

### **3.2. HEALTH, SAFETY AND DRUG AND ALCOHOL FREE ENVIRONMENT**

We value the physical integrity, health, safety and well-being of our Employees, service providers, business partners, customers and members of local communities. We manage our business responsibly, in accordance with the requirements established in our occupational safety policy and in current legislation.

We are committed to ensuring a productive, healthy and safe work environment that is free from the harm that substances such as drugs and alcohol can cause.

Thus, it is forbidden to exercise one's professional function under the influence of narcotics or in a state of intoxication, as well as to carry drugs and remain in the work environment in a state altered by the use of these substances, which can affect individual and collective performance and safety.

### **3.3. COMBATING VIOLENCE**

Ensuring a safe environment is of paramount importance to Órigo. We believe that everyone has the right to an environment free from violence and harmful situations.

We consider verbal or physical violence to be the use of physical force or any aggressive behavior, in order to threaten, humiliate, manipulate or embarrass someone.

It is expressly forbidden to carry weapons - of any kind - on Órigo's premises, except by security professionals duly qualified/authorized by the applicable legislation.

### **3.4. OBEDIENCE TO THE LAW**

Operating in compliance with all laws in force in the country and applicable regulations is a commitment of Órigo.

Policies, including topics such as practices to combat corruption and the extinction of child, forced or slave labor, reflect our commitment to always act in strict legality in our business.

### **3.5. PROHIBITION OF PRODUCT SALES IN THE WORKPLACE**

Órigo expressly prohibits employees from selling products or services in the workplace. This prohibition applies to all forms of commercial activity, including but not limited to informal sales, promotions, or any other sales-related activity conducted within the company.

Such practices may cause distractions and potential conflicts of interest. Any attempt to engage in the sale of products or services will be subject to internal disciplinary measures.

### **3.6. COMMUNICATION WITH EMPLOYEES**

Honest, objective, accurate and consistent communication is part of how we look at our business.

We recognize and encourage direct and transparent conversations between Employees, respecting the individuality of each one and promoting the healthy debate of ideas and the exchange of information.

We believe that in this way we achieve our goals with pragmatism and transparency.

## **4. OUR COMMITMENT TO PEOPLE**

### **4.1. RESPECT FOR HUMAN RIGHTS**

We do not use child, forced, slave or slavery labor, and we evaluate the integrity of our suppliers, partners and service providers in this regard.

We do not tolerate any form of degrading or violent treatment of our Employees, including, but not limited to, physical, mental, abusive punishment or forced labor.

We respect all laws related to the minimum age for work and support the effective abolition of child labor.

### **4.2. CONFIDENTIAL INFORMATION**

We interact with our customers, employees, suppliers and partners always based on a relationship of trust, as well as constantly working to protect this relationship and ensure the confidentiality of the information exchanged.

Confidential information should be treated and maintained in this way – in strict confidentiality and protected by appropriate controls. This includes a commitment to:

- To value the integrity of data and information, not manipulating or transiting such data and information, by personal physical or digital means, such as, but not limited to, personal email and social network;
- Not to appropriate information from Órigo, partners, suppliers, customers and Employees, regardless of the form of storage and availability of such data - pen-drives, personal e-mail, cloud archiving or any similar artifacts;
- Not to share information and data made available in internal communication or internal social network with the market, without the prior consent of the relevant board of directors.

### **4.3. PROTECTION OF PERSONAL DATA**

We respect the privacy of our current, former and future Employees, as well as our partners, customers, suppliers and service providers, through the protection of personal and sensitive information, complying with Law No. 13,709/2018 ("General Data Protection Law" or "LGPD").

Everyone has a duty to notify Órigo immediately, without undue delay, of any breach or attempted breach of personal data of which they become aware, and to cooperate in the investigation and mitigation of incidents of personal data breaches. For matters related to the violation or attempted

violation of personal data, access our Privacy Policy, available at: <https://origoenergia.com.br/politica-de-privacidade>.

## **5. OUR ASSETS**

### **5.1. INTELLECTUAL PROPERTY**

Creativity and innovation are always encouraged in our work environment. Órigo defines the guidelines for the ownership of intangible assets, such as patents, trademarks, copyrights and trade secrets, in addition to providing guidelines to Employees who want to contribute ideas.

All Intellectual Property will remain with Órigo after the termination of the relationship with any Collaborator, authorizing the improvement and maintenance of the title to such property. The use of trademarks, patents, identification signs, industrial designs and other assets protected by intellectual property must respect the established contractual limits.

### **5.2. TANGIBLE PROPERTY: MATERIAL GOODS AND EQUIPMENT**

Equipment and tools are offered to everyone, aiming at the execution of professional activities.

We must always work together to prevent theft, destruction or inappropriate use of equipment. The same understanding applies to the use of corporate cars, whether as a work tool or as a benefit.

Any omissions in the Operational Procedure for the Use of Corporate Vehicles will be dealt with by the Supply team together with HR.

### **5.3. ELECTRONIC TECHNOLOGIES AND COMMUNICATIONS**

Technology and electronic communication are pillars for the execution of our daily activities.

We must use this technology in accordance with Órigo's rules and policies, maintaining the use of computers, tablets, cell phones and any other technological devices made available, for the purpose of carrying out and developing professional activities.

The use of the technologies offered by Órigo for personal purposes should be avoided and should never impact the capacity of our system or our productivity.

The resources provided by Órigo must not, in any way, be used for illegal purposes.

It is expressly forbidden:

- Exchange, rescue, storage or use of obscene, pornographic, violent, discriminatory, racist or defamatory content, which disrespects any individual, group of individuals or entity;
- The disclosure, internal or external, of messages that violate the principles established in this Code of Conduct;
- The exchange of messages with the "Competition" about Órigo and its activities, unless previously approved by the relevant board of directors, observing the applicable rules and policies.

All communications and information that are archived or transit through Órigo's equipment and data media are the exclusive property of Órigo.

Órigo may, at any time, monitor the use of all electronic means of communication and data transmission, including access to corporate applications, to prevent abuse and protect its interests.

We must ensure the correct use of Órigo's internal information systems, communication and data transmission resources, using our best efforts and expending the same protection and diligence that we would have if such information and resources were ours, in order to protect against loss, theft or misuse. Also, inappropriate or unauthorized use may be configured as misappropriation of Órigo's assets, subjecting the offender to the appropriate extrajudicial, administrative and judicial measures.

The granting of access, by Órigo to its Employees, partners, suppliers and service providers, to use the information, communication and data transmission systems, does not grant users any expectation of privacy in the use of the systems and resources made available.

For this reason, Órigo may, at its sole discretion, in accordance with current legislation, use and monitor any information transmitted or stored in these media. This rule covers information written or stored in an electronic system, as well as any other associated means. It also includes information developed technically, acquired by associations, acquisition, license, purchase or entrusted to Órigo.

All files and information related to professional activity that are created, received or stored in these electronic systems are the property of Órigo, constituting commercial and legal assets. In the event of a change in the relationship between an employee or partner and Órigo, including, but not limited to, the termination of the employment contract or the provision of services or supply of goods, the information in the possession of such Employees or partners must be forwarded to the immediate leadership for safekeeping, disposal or any other pertinent measure.

The password to access the systems is for exclusive personal use, and it is not allowed to be granted to third parties, even if a co-worker. The user who improperly grants his access password, as well as whoever receives it, will be responsible for the damage to the systems, information and data resulting from this infraction.

Any type of software and programs should not be copied or installed on Órigo's computers without the prior authorization of the Department of Information Technology.

#### **5.4. TRAVEL**

The Corporate Travel and Expenses Policy, together with the Corporate Credit Card Use Policy, guides all Employees regarding the trips made in the development of professional activities, including the use of corporate credit cards, advance payments, reservation of airline tickets and hotels, car rental, meals and rules for expense reimbursements.

Each one is responsible for controlling and accounting for the amounts spent, for reimbursement purposes, according to the current policy.

#### **5.5. PARALLEL WORK**

We understand that focus during the workday is essential for the excellent execution of our activities and professional responsibilities. Thus, it is not allowed to carry out activities parallel to the work that may harm the interests of Órigo, as well as it is not allowed to carry out any other professional activities, paid or free, during the working day, observing the provisions of each employment contract.

Furthermore, it is forbidden to use the work tools granted by Órigo and/or information held by Órigo for activities - paid or not - that have no relation to the achievement of Órigo's business.

Assistance or operation with competitors must not be carried out, except in the case of special projects, under the terms of the law, upon prior and express request and authorization of Órigo's board of directors.

## **6. OUR COMMITMENT TO TRANSPARENCY AND THE FIGHT AGAINST CORRUPTION**

### **6.1. CORRUPTION PREVENTION**

Any and all forms of corruption must be fought. We emphasize our commitment to combat all forms of bribery, kickbacks, fraud, money laundering and terrorist financing or any other illicit activity that may constitute a violation of the Anti-Corruption Law and its applicable regulations, or foreign laws that prohibit corruption.

We value compliance with accounting methods, in accordance with accounting standards and practices, maintaining books, records and accounts reflecting, in a detailed, accurate and correct manner, all of Órigo's transactions.

The commitment to fighting corruption presupposes that all transactions are documented and coded for the relevant accounts, in a way that mirrors their nature.

In case of suspicion about the alteration of the accounting books, non-compliance with the accounting records or any other procedure that aims to camouflage payments or financial transactions, the reporting channels are able to receive the communication of the suspected infraction.

For more details, please refer to the Anti-Corruption Policy on the website: <https://origoenergia.com.br/>.

### **6.2. POLITICAL ACTIVITIES AND CONTRIBUTIONS**

As a non-partisan organization, we do not support political parties, either directly or indirectly, nor do we make financial contributions to political parties, political candidates, or public officials.

We have, however, the free right to associate with political parties and campaigns, as long as such activity is not practiced on Órigo's premises, negatively impacts our activities or conflicts with any other current policy of Órigo.

### **6.3. RELATIONSHIP WITH PUBLIC AND GOVERNMENT ENTITIES**

Whenever a demand is presented by a government representative, including inspection processes, the employee must submit it to the Legal Department before any referral.

Órigo will not publicly comment on government policies and decisions that may affect the progress of its business and the relationship with Employees, customers, partners or shareholders. Such manifestation, however, will only occur, at the discretion of Órigo and upon approval of Órigo's Board of Directors.

We cannot use the name of Órigo in dealing with personal matters of any nature in our relationship with the government.

Punitive measures for unethical conduct, such as verbal or written warning, suspension and dismissal, may be adopted to safeguard the reputation and image of Órigo and to induce the practice of ethics.

Communication with government entities, government officials, regulatory bodies and agencies, or any national or international public entity is part of our business routine.

Thus, only Employees specifically designated by Órigo are authorized to speak on behalf of the company.

The provision of information to the governmental spheres, including municipal, state and federal public agencies, must always be made in writing, through protocol and with the due approval and guidance of the Legal Department.

#### **6.4. CONDUCT OUTSIDE ÓRIGO**

We believe that we must be judicious with our conduct in public environments when representing Órigo or in situations that allow the identification of Órigo as our employer or contractor, using uniforms and/or work tools with a logo.

Our conduct in work situations must be compatible with Órigo's values and must follow the provisions of this Code of Conduct, thus contributing to the recognition of Órigo's good image.

#### **6.5. CONFLICT OF INTEREST**

In the course of our professional activities, we must always act impartially and for the benefit of Órigo.

A conflict of interest is characterized whenever, regardless of position or function, we have extra-professional interests contrary to or conflicting with the interests of Órigo, in a decision that must be made or in which we must participate, or even in which we can influence.

The conflict of interest can occur, for example, due to:

- commercial relationship in which there is a personal interest contrary to the interests of Órigo; or
- participation in competing companies, customers, partners, suppliers or service providers of Órigo; or
- participation in parallel activities that affect the execution of activities at Órigo.

In the event of a situation of conflict of interest, real or apparent, we must immediately communicate to the immediate superior, in a justified manner, the request for removal from that activity, so that our decisions or information during the process do not bring harm to Órigo or personal benefits.

It is also prohibited:

- directly or indirectly, even through spouse or relatives, holding equity interests and/or interests of any nature in companies, companies or organizations (suppliers, partners, service providers) that have business relations with Órigo, unless previously approved by Órigo's Compliance Department;
- maintain any degree of subordination - direct or indirect - with a spouse, partner or 3rd degree relative in the performance of activities under their responsibility as an employee of Órigo.

Employees who have the ability to exert a direct or indirect influence on the hiring of suppliers should not use the same suppliers for contracts or personal orders.

#### **6.6. BOOKS, RECORDS AND INTERNAL CONTROLS**

All records such as sales reports, research, tests, expense reimbursement, records of hours worked, financial reports, accounting, and other documents must be factual, accurate, and clear.

All persons involved in the completion of the books and records must ensure that Órigo's financial notes are accurate, complete, legible and completed in a timely manner, based on the accounting principles and internal control structures adopted by the Company, in order to reflect events and business transactions in which Órigo has taken part.

It is strictly forbidden to coerce, deceive, manipulate or mislead any internal or external party involved in auditing, inspection or other forms of judicial, administrative or regulatory inspection.

## **7. OUR RELATIONSHIP WITH THE MARKET**

### **7.1. CUSTOMER RELATIONS**

We do not discriminate against customers. However, Órigo reserves the right to terminate any business relationship whenever its interests are not met or when the relationship represents a legal, social, environmental or reputational risk.

It is not allowed, under any circumstances or justification, to make improper payments - to any person or company - with the intention of facilitating the sale, offer or dissemination of our products or services.

All sponsorships must be approved in accordance with the policy established by Órigo and formalized through instruments entered into between Órigo and the institutions involved.

### **7.2. RELATIONSHIP WITH SUPPLIERS, ENERGY DISTRIBUTORS AND PARTNERS: GIFTS, CORPORATE GIVEAWAYS AND HOSPITALITY**

The selection and contracting of suppliers must be subject to transparent and unequivocal competition, privileging the technical competence, legal compliance, unblemished reputation and ethical behavior of the supplier, aiming at the best possible return in terms of cost and quality for Órigo.

Thus, Employees, partners, energy distributors and service providers are expressly prohibited from requesting or demanding, from any supplier or potential supplier or counterparty, any gift, payment, donation, gratuity, leisure option, sponsorship or proposal of any other advantage or benefit.

In the event that a supplier or potential supplier gives a gift to any Órigo employee, the following procedure must be observed:

- in the case of promotional items granted to any Órigo Employees, including directors and managers, the amount of up to R\$ 300.00 (three hundred reais) must be observed;
- Cash values can never be accepted.

We encourage our suppliers, regardless of size or geographic position, to adopt management practices aimed at excellence with regard to respect for human dignity, preservation of the environment and promotion of social justice.

We promote, together with them, the practices and principles established in this Code of Conduct, making them observe the good conduct practices contained in this document, through contractual clauses that are part of the supply and service contracts to be signed.

The offering of gifts, corporate giveaways, entertainment and hospitality to public agents must be communicated and approved by the Compliance Area. It is forbidden to receive gifts, corporate giveaways, entertainment and hospitality from public officials, whatever the value and custom.

### **7.3. COMMUNITY RELATIONS**

We promote and maintain a good relationship with the communities where we operate, participating in and developing opportunities for the local community. To this end, we collaborate with social responsibility actions adhering to Órigo's purpose.

However, the rules and procedures below must be observed when contributing to charitable causes:

- Requests for contributions must be made in writing, and must be specified, at least, the person or organization requesting, the amount requested and the purpose of the contribution;
- Requests must be carefully analyzed, so that it is verified that the contribution will not personally benefit any employee, partners, supplier or public official and that the institution is registered under the terms of the applicable legislation;
- The contribution can only be made to the institution duly constituted and registered under the terms of the applicable legislation;
- The contribution must be made to the institution and never to the individual and, under no circumstances, the payment must be made in cash or by deposit in a checking account held by an individual;
- It is necessary to obtain proof of receipt of all contributions made to charitable causes.

### **7.4. COMMUNICATION: MEDIA, PRESS, SOCIAL NETWORKS AND PARTNERS**

Our communication values responsibility, ethics, quality and pluralism. We encourage diversity of opinions, as well as freedom of expression, and we are committed to truthful information and market education about our business model with the intention of generating positive impact and influencing society to adopt more sustainable and conscious habits.

The use of our brand or brand assets, such as name, logo, or any other element used to identify the Órigo company, as well as the creation of digital platforms in the name of Órigo (such as, for example, Instagram, Twitter/X, Facebook, advertisements in general, or even dissemination of content), can only be done by employees, third parties or partners for the purposes of communication, advertising, events, sponsorships, or sales with the prior consent of the Brand & ESG Board.

Likewise, news releases and contact with the media and press play an important role in shaping Órigo's image and public perception. Thus, we must always direct requests from press agents, media, requests for interviews or statements to the Brand & ESG Board and we cannot, under any circumstances, provide any type of information, document, image, or statement directly to the media, digital vehicles or third-party partners, without the prior approval of this same Director.

Órigo's official spokespersons are established by the team responsible for the Brand & ESG Board, and they are the only ones authorized to respond to the press, using their image and position occupied, endorsing the company's position, previously aligned with the responsible team.

Órigo Energia employees must not declare personal opinions on social networks or in other public forums, presenting them as official positions of the Company, without prior alignment and authorization from the Brand & ESG Department. They must also not disclose sensitive data or confidential information (e.g., texts, images, screenshots of systems, platforms and presentations, etc.) about the Company or its business, customers or suppliers by any public means. Any individual statements will not be considered as official of Órigo Energia, as provided for in this Code. Even so, any individual statement in public channels, events or digital media that may hurt the reputation or image of the Órigo brand, may give rise to the application of the applicable administrative or legal sanctions.

The expression of language or opinions that are discriminatory or that incite hatred and violence against any person or group, whether due to skin color, ethnic origin, nationality, religion, sex, age, sexual orientation, gender identity, disability or any other reason, abuse, harassment or manifestation of any type of prejudice on social media or instant messaging applications, even when not related to the Company, are in disagreement with this Code. Likewise, incitement to illegal attitudes, which harm the environment or abuse the consumer's good faith should not be expressed. Such attitudes may lead to the application of the applicable administrative or legal sanctions.

Attitudes not in accordance with the above guidelines may lead to the application of the applicable legal sanctions.

## **7.5. RELATIONSHIP WITH THE COMPETITION**

We are committed to conducting our business ethically and fairly.

Information about competition, customers, and suppliers is a valuable asset in such a competitive market. However, no form of obtaining illegal or unethical information will be encouraged or tolerated. No information should be sought or used in a way that violates laws or contracts.

Any attitude that damages the image of Órigo's business partners or competitors is prohibited.

In addition, it is forbidden to promote, together with competitors, understandings with the objective of abuse of economic power or arbitrary commercial practices.

Any confidential information related to Órigo's activities and business, which is passed on - directly or indirectly - to the competition, will be investigated and penalized in accordance with the law, this Code and the policies in force.

## **7.6. PARTICIPATION OR ASSOCIATION WITH OTHER COMPANIES**

Our eventual performance in *joint ventures*, consortia, mergers and acquisitions must be in accordance with ethical standards, and in accordance with anti-corruption and anti-money laundering laws. There will be *specific due diligence*, with the purpose of verifying the suitability of the partner company or to be acquired, as well as its compliance with all legal provisions to which it is subject.

We reserve the right not to enter into contracts with companies that are not in compliance or that do not present the necessary information, especially with regard to the provisions of the Anti-Corruption Law.

## **8. OUR RELATIONSHIP WITH THE ENVIRONMENT**

### **8.1. ENVIRONMENTAL RESPONSIBILITY**

We recognize the universal impact of climate change and the need to stimulate business and economic development in a sustainable way. We are committed to providing products with socio-environmental responsibility, from the generation of photovoltaic energy, that meet the expectations of our customers and, at the same time, contribute to the energy transition process.

We seek to engage partners and suppliers to improve their social and environmental practices and thus contribute to the preservation of the environment.

We are committed to always choosing the path with the least environmental impact in carrying out our activities, projects, services and products. To this end, we seek to identify, mitigate and/or prevent any possible environmental risks from materializing, as well as to address adverse environmental impacts

that our activities may cause to the environment. We are always open to understanding a "new way of doing" that generates efficient results and enhances positive impacts.

## **8.2. SUSTAINABILITY**

We believe that corporate sustainability is the key to building a balanced and lasting business that positively impacts everyone involved in our production and value chain. Therefore, we act with transparency in risk management to comply with the legislation and we adopt national and international standards and references for the implementation of our socio-environmental and governance practices

## **9. EFFECTIVENESS AND MANAGEMENT OF THE CODE**

The Compliance Area is responsible for this Code, for disclosing its terms and for conducting training, which must be given periodically. In order to ensure constant applicability and improvement, the Code must be reviewed whenever necessary.

The Compliance Area is also responsible for the day-to-day management of the Integrity Program, which includes: (i) clarifying doubts from employees and consultants; (ii) monitor the developments related to the Whistleblowing Channel and ensure the reporting of the violations identified to the Ethics Committee; (iii) receive, monitor and record the report of receipt of gifts, entertainment or hospitality by employees; (iv) forward issues to the Audit, Risk and Compliance Committee ("CARC"); (v) review and monitoring of the Integrity Program, which shall occur at least once a year; and, as the case may be, (vi) propose and establish mechanisms and/or protocols for monitoring, control, follow-up and training to prevent potential illegal and unethical conduct.

The Ethics Committee is the body responsible for receiving complaints, investigating and evaluating violations of the Code of Ethics, Anti-Corruption Policy and other applicable rules and policies of Órigo, in an impartial and confidential manner, ensuring the protection of the topics and people involved and sanctions in case of violations.

In any case, we hope that all people who have any connection with Órigo will act as guardians of this Code.

## **10. CONSEQUENCES FOR NON-COMPLIANCE WITH THIS CODE**

In the event of any violation of the rules set forth in this Code and any of our Policies, the Compliance Area will adopt, together with the Ethics Committee, immediate measures to cease the irregularities, initiate the investigation of responsibilities and remedy any damages that may occur.

Infractions committed intentionally or negligently may lead, according to the seriousness of the act committed, to an oral and written warning, suspension, dismissal without just cause or for just cause of the Employee.

The Ethics Committee will evaluate the application of disciplinary measures according to each case, in accordance with current legislation and the seriousness of the violation, in a consistent and proportional manner to the non-compliance, regardless of the Employee's position/seniority.

Suppliers and business partners are also subject to contractual sanctions, such as suspension of supply, termination of the contract, and other penalties and consequences provided for in applicable legislation.

## **11. ETHICS CHANNEL: DISCLOSURE OF EMPLOYEE CONCERNS**

We believe in the transparency of relationships and always foster a problem-solving attitude among our Employees, suppliers, contractors, representatives and business partners, promoting relationships of openness and trust among everyone at Órigo, regardless of hierarchy. We understand that most work-related concerns can be resolved through a frank conversation between the agents involved.

However, sometimes it can be more difficult to know how to react when concerns involve sensitive issues, such as: Misconduct, any violation of the provisions of this Code or any of Órigo's policies in force. To this end, we provide neutral and confidential channels for reporting complaints, doubts and/or concerns, which are:

**Whistleblowing Channel:** <https://www.contatoseguro.com.br/origoenergia> or call toll-free 0800 800 1236.

Our Whistleblowing Channel works 24x7 and is maintained by a third-party and specialized company, **ensuring anonymity and confidentiality** of the information received, and **any type of retaliation is totally prohibited**.

After the analysis of the report by the company managing the Whistleblowing Channel, the report will be sent to Órigo's Compliance Area, responsible for investigating the facts together with the Ethics Committee, which will analyze what happened and take the appropriate measures.

We encourage and recommend the use of the channels disclosed above in a responsible manner at all times and we do not tolerate any form of retaliation against anyone who reports any fact, complaint, concern or collaborates with any internal investigation.

## **12. EMPLOYEE TRAINING**

All Employees must undergo periodic training, at least annually, on the Company's Integrity Program.

## **13. OTHER PROVISIONS**

This document should be read and considered in conjunction with other applicable standards, rules and procedures adopted by the Company. In addition, this policy must be broken down into other specific normative documents, always in line with the guidelines and principles established herein.

All Company Policies will be available on cloud storage device for free and unrestricted access.

## ANNEX I

### TERM OF RECEIPT AND KNOWLEDGE OF THE CODE

I declare that I have received the Code of Conduct from Órigo and that I am aware of its content, which will be applied in the exercise of my duties and that I will be subject to appropriate administrative, civil, labor and criminal liabilities arising from its non-compliance.

In addition, I accept, whenever requested, to comply with and comply with additional precepts disclosed by Órigo that may be part of this Code of Conduct, without the need to sign a new term.

Full name:

Date:

Signature: