



## INFORMATION DISCLOSURE POLICY

Code: PGJ000007

Doc.

### AERIS INDÚSTRIA E COMÉRCIO DE EQUIPAMENTOS PARA GERAÇÃO DE ENERGIA S.A.

Corporate Taxpayer's Register (CNPJ) No.: 12.528.708/0001-07  
NIRE: 23.300.030.125

#### INFORMATION DISCLOSURE POLICY

#### 1. DEFINITIONS

1.1 The terms and expressions mentioned below, both in the singular and plural, when used in this Information Disclosure Policy ("Disclosure Policy") will have the following meanings:

- "Controlling Shareholders"** It means the shareholder or group of shareholders connected by shareholders' agreement or under common control that carry out control power of the Corporation, pursuant to the Corporation Law.
- "Managers"** It means officers and members of the board of directors of the Corporation.
- "Stock Exchange"** It means the stock exchanges and entities of the organized Over-the-counter market where the Securities issued by the Corporation are or might be admitted to negotiation, either in Brazil or abroad.
- "Colligated"** It means the companies where the Corporation has significant influence, according to the Corporation Law.
- "Corporation"** It means the Aeris Indústria e Comércio de Equipamentos para Geração de Energia S.A.
- "Directors"** It means the members, effective and deputies, of the fiscal committee of the Corporation.

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<b>“Controlled”</b>	It means the companies where the Corporation, directly or through other controlled companies, is holder of rights of partner that assure it control power.
<b>"CVM"</b>	It means the Securities Commission.
<b>“Investor Relations Officer”</b>	It means the relations officer with investors of the Corporation.
<b>“ICVM 358/02”</b>	It means CVM Instruction 358 of January 03rd 2002, as amended, which deal with the disclosure and use of information about relevant act or fact related to publicly-held companies, as well as the negotiation of securities issued by publicly-held company in pendency of relevant fact not disclosed to the market, among other matters.
<b>“Privileged Information”</b>	It means all Relevant Information still not disclosed to the market and investor public.
<b>“Relevant Information”</b>	It means any and other decision of Controller Shareholders, decision of general meeting or administration bodies of the Corporation, or any other act or fact of political-administrative, technical, business or economical-financial type, occurred or related to business of the Corporation, which might influence in a negotiable way: (i) quotation of Securities; (ii) decision of investors of buying, selling or keeping the Securities; or (iii) in decision of investors carrying out any rights inherent to the condition of holder of Securities.
<b>“Corporation Law”</b>	It means Law 6.404 of December 15th 1976, as amended.
<b>“Bodies with Technical or Consultive Functions”</b>	It means the Corporation bodies, created by statutory provision, with technical functions or destined to assist its Directors.
<b>“Connected Persons”</b>	It means (i) the Corporation; (ii) the Controlling Shareholders, direct and indirect of the Corporation; (iii) the Directors; (iv) Fiscal Counselors; (v) members of Bodies with Technical or Consultive Functions; and (vi) whoever, in

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virtue of his office, function or position in the Corporation, its controller, its Controlled Companies or Colligated, has knowledge of Privileged Information.

**“New Market Regulation”**

It means the New Market Regulation of B3 S.A. – Brazil, Stock Exchange, Branch.

**“Adhesion Document”**

It means the instrument whose template is part of this Disclosure Policy, according to Annex I, to be entered into by Connected Persons, according to article 16, paragraph 1 of ICVM 358/02, and by means of which each undersigned manifest his formal adhesion to the rules included in this Disclosure Policy, undertaking the obligation of observing it and take care so that the rules included there are observed by persons who are under his influence, including companies, directly or indirectly controlled, colligated or under common control, spouses, partners and dependents included in the yearly income tax return.

**“Securities”**

It means any security issued by the Corporation, including, shares, debentures, subscription bonus, receipts and subscription rights, promissory notes, purchase options or also any other titles or collective investment agreements of issuance of the Corporation or referenced to it which, by legal determination, is considered securities.

## 2. OBJECTIVE

2.1 This Disclosure Police seek to define rules, procedures and guidelines to be observed by the Investor Relations Officer and other Connected Persons when it comes to use and disclosure of Relevant Information, as well as maintenance of secrecy of Privileged Information.

## 3. COVERAGE

3.1 This Disclosure Policy is applicable and it must be observed by the Connected Persons, which must adhere to this Disclosure Policy upon signature of the Adhesion Document, according to Annex I.

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31.1. The Adhesion Documents entered into by the Connected Persons must remain filed un the Corporation headquarters while those persons have connection with the Corporation and also for 05 (five) years, at least, after their release.

**32** The Corporation will remain filed in its headquarters, at the disposal of CVM, the updated list of Connected Persons who0 enter into the Adhesion Document, with their respective qualifications, position or function, address and register number in CPF or CNPJ, as applicable, updating it whenever there is amendment.

32.1. The Connected Persons have the obligation of immediately notify to the Corporation, in writing, the change of any of his registration data.

#### **4. ATTRIBUTIONS OF THE OFFICER OF RELATIONSHIPS WITH INVESTORS**

**4.1** Without prejudice of other duties and liabilities set out in the applicable legislation and regulation, as well as in this Disclosure Policy, it is responsibility of the Investor Relations Officer:

- (i) disclose and communicate to CVM and Stock Exchange, immediately after their awareness and analysis, according to applicable standards, any Relevant Information related to the business of the Corporation;
- (ii) to take care with broad and immediate spread of Relevant Information, simultaneously, whenever possible, in Stock Exchange, as well as investor audience in general;
- (iii) In case of request by clarifications by CVM or Stock Exchange or if there is atypical oscillation in the quotation, price or negotiated amount of Securities, inquire the Connected Persons and with access to Relevant Information, as the case, may be, with the objective of checking if they are aware of information that must be disclosed to the market
- (iv) analyze and decide about the characterization or fact or act as being Relevant Information and participate in decision making related to the convenience or not of its immediate disclosure to the market;
- (v) as the case may be, within terms and hypothesis defined in the applicable standards, send to CVM and Stock Exchange information related to the holding and negotiations carried out with Securities and securities issued or referenced in securities of issuance of controllers or Controlled or the Corporation that are publicly-held companies, with regard to the own

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Corporation, its Controlled and Colligates, Administrators, Fiscal Councilors and members of Bodies with Technical or Consultive Functions, Controlling shareholders; and

- (vi) apply this Disclosure Company and follow up its execution.

### 5. DUTIES OF CONNECTED PERSONS

**5.1** Without prejudice of other duties and liabilities set out in the applicable legislation and regulation, as well as in this Disclosure Policy, it is obligations of the Connected Persons:

- (i) notify to the Investor Relations Officer any relevant information they are aware of;
- (ii) if they are personally aware of Relevant Information, whenever confirm the omission of the Investor Relations Officer in the execution of their duty to disclose the respective Relevant Information, immediately notify such Relevant Information to CVM;
- (iii) keep secrecy of any Privileged Information to which they had access due to the function or position they occupy, up to their disclosure to the market, as well as taking care for the subordinates and third parties of their trust also do it, being jointly liable with them in case of non-compliance;
- (iv) refrain from discussing Relevant Information in public places, and they must only deal with subjects related to the Relevant Information with which they need to know the Relevant Information;
- (v) do not rely on Privileged Information to obtain, directly or indirectly, for themselves or third parties, any advantages, including through purchase or sale of Securities;
- (vi) notify the Company the information they are obligated to inform within terms and deadlines of applicable legislation and regulation, especially the information required according to articles 11 and 12 of ICVM 358/02 and article 30 of New Market Regulation, as the case may be;
- (vii) if inadvertently or without authorization, in any way notify, personnel or through third parties, Privileged Information to persons not connected to this Disclosure Policy and are not subject to the duty of

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secrecy, inform such act immediately to the Investor Relations Officer so that he take the steps he consider applicable; and

- (viii) immediately notify the Investor Relations Officer about any violations to this Disclosure Policy they are aware of.

### 6. PROCEDURES TO DISCLOSURE OF RELEVANT INFORMATION

**61.** The notification of Relevant Information to CVM and Stock Exchanges must be made immediately, through written document, describing with adequate details the occurred acts and/or facts, indicating, whenever required and possible, the involved amounts and other clarifications.

61.1. The disclosure of Relevant Information must be made in a clear and accurate way, in accessible language to the investor audience, indicating, whenever possible, the involved amounts, expected deadlines and any other clarifications that the Corporation consider relevant to proper understanding and more accurate assessment of the Relevant Information by the market.

**62.** The disclosure of Relevant Information must always be made simultaneously in Portuguese and English.

62.1. In the event that a Relevant Information escape from the control or occurrence of atypical oscillation in the quotation, price or negotiated quantity of Securities, the disclosure in English can occur until the following business day to the disclosure in Portuguese.

**63.** Pursuant to the applicable regulation, the disclosure of Relevant Information must be made through the following channels:

- (i) electronic system available in CVM website on line;
- (ii) webpage of relations with Corporation investors [www.aerisenergy.com.br/ri](http://www.aerisenergy.com.br/ri);
- (iii) “O Estado” Newspaper; and
- (iv) Official Gazette of the State of Ceará.

63.1. In case of modification in the notification channels above, this Disclosure Policy must be updated prior to the change.

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632 The Corporation can create an on line system to disclose information to investors, sending the Relevant Information through electronic mail (e-mail) of people registered in database created for this purpose, observing that this disclosure system will not replace the other information disclosure means defined in this Disclosure Policy and applicable standards.

64. In the event of broadcasting of Relevant Information by any communication mean, including information to the press or in meeting with class entities, investors, analysts or with selected public, either in Brazil or abroad, the Relevant Information must be disclosed previously or simultaneously to CVM, Stock Exchange and investor audience in general through official channels, according to the applicable regulation.

65. The disclosure of Relevant Information will be made, whenever possible, after ending business in the Stock Exchange. If it is required the disclosure before opening the negotiation session, such disclosure must be preferably made at least one hour in advance. In the event of simultaneous negotiation in over one Stock Exchange in different countries, it must prevail the operation time of the Stock Exchanges located in the Brazilian territory whenever there is incompatibility of times.

66. If it is imperative that the disclosure of Relevant Information occur during the negotiation time, the Investor Relations Officer must request, always simultaneously to the Stock Exchanges where the Securities of the Corporation are admitted to negotiation, the suspension of negotiation of Securities of the Corporation for the required time to the adequate spread of the Relevant Information, observed the procedures set out in the regulations edited by the Stock Exchanges.

67. Any doubt about the disposals of this Disclosure Policy about the instructions of the Investor Relations Officer and/or the necessity of disclosing or not certain information to the public must be clarified together with the Investor Relations Officer.

68. Whenever there is doubt about the relevance of a certain act or fact or the characterization of a certain information as Relevant Information and Privileged Information, the Investor Relations Officer must be contacted in order to clarify such doubt.

### 7. IMMEDIATE EXCEPTION TO THE DISCLOSURE OF RELEVANT ACT OR FACT

7.1. The Relevant Information can no longer be disclosed in exceptional cases, after analysis and decision of the Investor Relations Officer, Controlling Shareholders or Managers, as the case, that its disclosure can endanger legitimate interest

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of the Corporation. In the same regard, upon disclosure of the Relevant Information, it can be omitted, among other information, the name of the counterparty and location of the assets, provided that such omission does not harm the intelligibility and clearness of the information.

7.1.1. If the Relevant Information is connected to operations directly involving the Controlling Shareholders and they decide not to disclose it, this decision must be informed to the Investor Relations Officer.

7.1.2. In other cases, when the Relevant Information is connected to operations involving the Corporation, the Managers will be in charge of deciding to disclose or not the Relevant Information and informing the Investor Relations Officer.

7.1.3. Pursuant to applicable regulation, the Controlling shareholders and Administrators can decide to submit to analysis of CVM a matter about the disclosure to the public of Relevant Information that might jeopardize a legitimate interest of the Corporation

**7.2.** In the event that a Relevant Information escape from the control or occurrence of atypical oscillation in the quotation, price or negotiated quantity of Securities, the Controlling Shareholders and Managers are obligated to, directly or by means of the Investor Relations Officer, immediately disclose the Relevant Information.

## **8. PENALTIES**

**8.1.** The Connected Persons responsible for observance of any provision included in this Disclosure Policy and specific legislation undertake to return the Corporation and/or other Connected Persons, fully and without limitation, all losses that the Corporation and/or other Connected Persons might incur and that result, directly or indirectly, from such non-compliance, without prejudice of subjection to steps and penalties set out in the applicable legislation and regulation.

8.1.1. Without prejudice of provision in item 8.1 above, in case of infraction to this Disclosure Policy, the Connected Persons can be liable in the civil, criminal and administrative areas, being subject the steps and sanctions provided in the applicable standards.

## **9. GENERAL PROVISIONS**

**9.1.** This Disclosure Policy will be ruled in all its terms, as well as in omitted cases, by the Corporation Law, ICVM 358/02 and other applicable standards.

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**92.** This Disclosure Policy is in effect at the date of its approval by the Board of Directors, suspensively conditioned to the obtainment of record of Company as issuing securities and it will be disclosed according to provision in the applicable legislation and regulation and it remain in effect for indefinite term until there is a decision otherwise.

**93.** Any amendment in the Disclosure Policy must be (i) approved upon decision of the majority of members of the Board of Directors present in the meeting that decide about the subject and (ii) notified to CVM and Stock Exchanges.

**94.** In case of conflict between the provisions of this Disclosure Policy and the Articles of Incorporation of the Corporation, it will prevail the provisions of the Articles of Incorporation and, in case of conflict between the provisions of this Policy and the legislation in effect, it will prevail the provision in the legislation in effect.

**95.** If any provision of this Policy is considered invalid, illegal or ineffective, such provision will be limited, as much as possible, so that the validity, legality and effectiveness of the remaining provisions of this Disclosure Policy are not affected or harmed.

*Approved in Meeting of the Board of Directors of Aeris Indústria e Comércio de Equipamentos para Geração de Energia S.A., held in August 18th 2020.*

**Presiding Officers:**

\_\_\_\_\_  
ALEXANDRE FUNARI NEGRÃO

Chairman

\_\_\_\_\_  
LUIZ HENRIQUE DEL CISTIA

THONON

Secretary

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## ANNEX I

### ADHESION DOCUMENT TO THE INFORMATION DISCLOSURE POLICY

By this present instrument, [name], [civil status], [profession], residing and domiciled in [address], registered in the Individual Taxpayers Register (CPF) under number [●] and bearer of identity card RG n° [●] [issuing authority] (“Informant”), in the capacity of [function] of **AERIS INDÚSTRIA E COMÉRCIO DE EQUIPAMENTOS PARA GERAÇÃO DE ENERGIA S.A.**, corporation, headquartered in the City of Caucaia, State of Ceará, registered with the Corporate Taxpayer’s Register (CNPJ) under number 12.528.708/0001-07 (“Company”), state (1) have full knowledge of the Information Disclosure Policy of the Company (“Disclosure Policy”); (2) know the entire Disclosure Policy; (3) expressly agree with all provisions and rules and to be subject to the procedures set forth in the Disclosure Policy to the disclosure and use of information.

Furthermore, the Informant expressly undertake personal liability for the observance of rules included in the Disclosure Policy, being henceforth undertaken to ground his actions in the Company always according to such rules and also being subject to the possible penalties and obligations pursuant to the Disclosure Policy and applicable legislation. The Informant undertakes both for the obligations directly attributable to him and also to make the Company or people under his influence, including companies directly or indirectly colligated or under common control, spouses, partners and dependents included in the yearly income tax returns to comply with the duties defined in the Disclosure Policy.

The Informant sign this Adhesion Document in [2 (two)] counterparts of equal tenor and form, in the presence of 02 (two) undersigned witnesses.

Caucaia, [●] , [==] , [==].

\_\_\_\_\_  
[insert informant’s name]

Witnesses:

1.

Name:

ID Card No.:

Individual Taxpayer

Registration (CPF):

2.

Name:

ID Card No.:

Individual Taxpayer

Registration (CPF):

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