

Code of Conduct for Employees



aeris

CULTURE MANIFEST

“ We exist to help build a more sustainable world powered by clean energy. We strive every day to ensure the perpetuity of our business, generating consistent results.

We respect and value our employees and their families. They are the ones who make it all happen! We value ethics and transparency in our relationships and in dealing with problems.

We are obstinate and we always work in the search for the quality of our products and services. We want to be recognized as the best supplier for our customers.

We are aware of our social role and we promote actions for the development of our surroundings. This is our belief, our way -

THE WAY TO BE SO AERIS.

”



aeris

This code is connected to our value

CULTURE



President's speech

Aeris is a world reference company in the manufacture of wind blades and since its foundation in 2010, it has been guiding its activities in principles of ethics and integrity. We believe this is the only path to solid and prosperous growth.

By assuming the position of an ethical company, we are committed to respecting human rights, to acting responsibly to maintain and protect the environment, to guarantee the rights of the community in our business environment, as well as of society as a whole, and to fight against any and all types of corruption.

In this sense, the Aeris Code of Conduct presents an important role in guiding the behavior and conduct of all of us, Aeris employees, including Board members, officers and managers, who are equally

compromised by compliance with this document.

The Aeris Code of Conduct represents much more than a list of rules: it is, in fact, the personal commitment of each one of us to act ethically and care for the reputation of Aeris as an honest company that respects human rights and the environment, and is focused on consistent and lasting results.

Finally, we hope that you, Aeris employee, make a difference in the multiplication of the content of this Aeris Code of Conduct, becoming an example of ethics and integrity, promoting the strengthening of the necessary values so that Aeris continues to be recognized as a reliable and sustainable business partner.

If you have any doubts in your day-to-day life about how to behave, or what attitude to take in any situation, do not hesitate to seek assistance from your manager, the Ethics Committee or the Legal Department: we guarantee you the security of secrecy and non retaliation.

Bruno Vilela Cunha

President

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Values and Principles

A. The conduct and the law

Our fundamental principle is respect for the law. Therefore, compliance with legal systems and Aeris policies is the basic requirement of fair conduct and must always be prioritized in any circumstance.

Employees who commit any violation of laws or Aeris policies will be subject to the sanctions provided for by law and applicable disciplinary measures.

B. Mutual Respect and Diversity

We respect the individual rights of each of our employees, as well as the right to personal dignity and diversity among people.

Here at Aeris, we are concerned about the impact of the company's activities on Human Rights. That is why we pay attention to and respect the dignity of the human person, regardless of whether they are directly or indirectly affected by the company's support activity or target activity, including the company's community and surroundings.

We expect that our employees, in the exercise of their activities, both in the internal cooperation environment (when dealing with other work colleagues) and in the relationship with external partners (such as customers, suppliers and commercial partners), show respect for all these people, without practicing any type of discrimination by gender, nationality, age, physical ability, religion, color, or any other aspect of diversity.

In this way, we provide an environment of inclusion, adopting measures that allow parity of knowledge and guarantee equal treatment to all people, regardless of physical, ethnic and racial, or gender differences,

from the recruitment and selection stages, to the development of career. Hiring and promotions within Aeris are done on the basis of meritocracy and for this reason we prohibit any hiring, remuneration and/or dismissal of employees based on sexual orientation, color, age, ethnicity, nationality, religion, union affiliation, political partisanship or physical disability, or any other situation or condition that, in any way, may compromise equal treatment between people who work or act (regardless of the format of the relationship) in the Company.

C. Right to privacy

We understand that privacy rights, which form part of the human rights of employees, must be subject to constant respect and, therefore, we guarantee the processing of personal data in accordance with the Aeris Privacy Policy and in compliance with applicable laws. Within the legal limits, Aeris has the right to supervise and control its employees' emails, as well as the use of the Aeris Internet network, therefore, all communications via email or any other application that uses the Aeris hardware and software resources, whether received or sent, will be treated as proprietary information of Aeris and therefore subject to control, access, retrieval and investigation by Aeris.

In this sense, Aeris employees who use the equipment or resources made available by Aeris are prohibited from claiming any privacy rights beyond those provided for in the applicable law.

A. Protection against harassment or Human Rights violations

Aeris promotes the principle of zero tolerance for any and all types of harassment or violations of Human Rights, regardless of how it manifests itself (through personal contact, in writing or through words), which can directly impact physical and mental health of the affected person, as well as on their professional performance.

For this reason, we adopt concrete measures that value human work and guarantee equity and balance in the performance of activities, as well as we carry out any changes in internal policies and rules of conduct of the company, such as this Code of Ethical Conduct, or even other effective repair measures, if necessary. We understand that a healthy work environment is one that is free from harassment and that is why we must take an active role in combating any type of conduct that may be offensive or that in any way may make people feel harassed: pejorative nicknames, intimidation, unwanted physical contact, inappropriate gestures, slander, defamation, insults, intimidation, aggressive acts and derogatory jokes. Such conduct is strictly prohibited in the Aeris workplace.

E. Physical and Psychological Health and Safety

Ensuring the physical and psychological health and safety of our employees in the workplace is a priority for Aeris. For us, it is our duty to maintain strict and effective procedures that guarantee the protection of the health and safety of our employees.

It is the responsibility of each of our employees:

- Knowing and complying with the measures and procedures adopted by Aeris to prevent accidents at work;
- Taking care of their personal protection and the protection of their co-worker;
- Contributing to the multiplication of knowledge of the measures and procedures adopted by Aeris in the prevention of accidents at work; and
- Immediately reporting situations that present any potential risk to health or safety.

Here at Aeris, we are concerned with adopting measures that promote decent, dignified work, which naturally leads us to treat our employees respectfully, from the perspective of Human Rights, diversity and inclusion. This is also translated, for example, through the guarantee of reasonable hours and ideal working conditions, as well as respect for the minimum age for hiring professionals.

F. Transparency

We adopt Transparency as a principle, whether from an internal perspective with all the people who are part of our structure, or from an external perspective,

with our commercial partners, suppliers, customers and society in general, including the community around us.

2. Compliance Requirements

A. Who must comply with this Code

The Aeris Code of Conduct must be followed by anyone who works for Aeris or who represents Aeris, including officers, managers and all other employees.

All Aeris employees who have an interface with third parties, be they customers, suppliers and/or independent service providers, must be committed to making these third parties aware of the Aeris Code of Conduct, always providing them with all the necessary instructions to avoid any type of breach of Aeris Policies.

B. The role of managers

It is the duty and responsibility of every manager to be an example of integrity before their employees, through their personal conduct, the exercise of their functions and mainly through their supervision duty, which aims to guarantee that there are no violations of this Code and the Aeris Policies. Managers are responsible for all employees under their management and, therefore, must play an active role in spreading knowledge and rooting the Culture of Integrity in all of them. It is up to managers to maintain a clear discourse, based on honesty and transparency, ensuring that their employees feel a safe environment to report any Compliance issues (related to lack of integrity or unethical behavior) without fear of retaliation.

In addition, managers must adopt measures to prevent and combat corruption, avoiding situations in which resources are used to deviate from compliance with legislation, or the illicit use of Company resources, which could even be allocated to the development of the community in the surroundings of the company, in the municipality of Caucaia.

In this sense, being an honest manager includes:

- Play an active role in preventing, detecting and combating any acts of violation of this Code and any Aeris Policies;
- Be consistent with Aeris' Culture of Integrity: their attitudes must be consistent with their speech;
- Be an active voice on the importance and benefits of integrity; and
- Document and forward to the appropriate channels, Compliance issues (related to lack of integrity or unethical behavior) that they become aware of.

It is important to mention that managers' responsibilities do not exempt employees from their own responsibilities, and that they remain responsible for personally complying with each of the standards in this Code.

3. Responsibilities Requirements

3.1. Responsibility for what is ours

A. Use of AERIS' assets

AERIS is committed to providing its employees with the best work tools, always aiming to allow greater efficiency and the professional development of its employees, this includes telephones, computers, software, Internet network, copiers, electronic mail systems, among other equipment and devices. The use of Aeris assets must be limited exclusively to the performance of professional activities by employees, for the benefit of Aeris and never aiming at the personal favor of those who use them and, therefore, they must be the object of permanent care and zeal, in order to avoid that they suffer any damage, theft or loss.

Thus, work tools and materials made available by Aeris must not be taken outside the company, unless duly authorized, in accordance with current Policies. Thus, in order to curb inadequate conduct, Aeris may carry out searches of its suppliers, as well as it may do the same with its employees (following due respect for intimacy, honor, human dignity, and employee image) without prior notice, in order to curb deviations of tools, equipment, and or materials.

Under no circumstances may the employee use Aeris assets to perform acts that constitute any type of violation of this Code of Conduct or Aeris Policies.

B. Confidential Information

It is also our duty to respect the rights of protection and secrecy of confidential information owned by Aeris.

Among these, we can consider any and all confidential information to which the employees may have access due to the work they perform or position they hold.

The importance of respecting the secrecy of confidential information consists of the fact that it may contain data that, if shared with people who should not have access to it, could cause great harm to Aeris, its customers and/or business partners, as an example we can mention:

- Information about details of our manufacturing process, price, sales, profits, markets;
- Information on development strategies;
- Equipment data sheet; and
- Customer data and technical information.

It is necessary that all confidential information be expressly classified in this way, with the aim of keeping it safe and with its access limited only to people who should know about it.

In order to guide everyone on whether information is sensitive and, therefore, whether it should be classified as confidential, Aeris has the Aeris Data Classification Policy, which must be read for a better understanding and compliance with the rule. In any case, we suggest that whenever you are in doubt as to whether or not you are dealing with confidential information, you consult the Legal Department, and they will be able to assist you.

C. Disclosure of information, privacy and safety

Everything produced by Aeris is part of its assets: its equipment, services, projects, product, including its information. Thus, it is up to all employees to protect and use them appropriately, so that the use of this information is done based on availability criteria and at the appropriate time.

The Aeris Data Classification and Privacy Policies establish the necessary guidelines regarding the treatment,

use and disclosure of Aeris information. It is up to all employees to know and apply them, as everyone is responsible for the integrity and confidentiality of this information. All those who have access to Aeris' information, whether privileged or not, may only use it for the benefit of Aeris itself, its use for personal purposes being prohibited. The disclosure of which, to any public, in situations such as lectures, presentations or publications, can only be made after formal authorization from the Legal Department of Aeris, or even, through sharing of information made by Aeris itself in the media and Social Networks.

D. Aeris and Third-Parties Intellectual Property Rights It is the duty of every employee to respect and protect the Aeris and third-parties intellectual property rights. Under no circumstances, it is allowed to obtain or share confidential data from third parties, especially customers and business partners.

In the same way that we must take care of Aeris' confidential information, it is necessary to understand and respect the fact that the information (about projects, products and or services) created by customers and business partners took time, investment and dedication to be prepared. When something created by them is made available to Aeris, it is precisely because of the relationship of mutual trust that we maintain with these agents.

Thus, we cannot use it without their authorization, much less sell it or have it as a participant in any type of commercial relationship, without being previously and formally authorized by them and by the managers of Aeris. Respect and Transparency are fundamental in our commercial relationships with our customers and business partners.

When it comes to work carried out with the total or partial involvement of Aeris, or on its behalf, regardless of the relationship that gave rise to it, which implies intellectual creation, it will guarantee Aeris participation in the ownership of property rights.

In this way, it is the employee's duty to communicate to the immediate leadership any and all intellectual production, subject to registration and protection. In turn, the leadership must communicate to the manager, who must contact the Legal Department, so that the necessary measures can be taken.

E. Conflict of Interest

The Aeris employee is expected to always make its decisions prioritizing the best interests of the Aeris.

In this sense, there is a conflict of interest when the personal interests of employees oppose the interests of Aeris. Employees must avoid getting involved in conflicts of interest, such as the following situations, among others:

- Have a personal business relationship with any Aeris competitor, customer or supplier;
- Hiring relatives as a subordinate or in the same work area;
- Participation in parallel activities that compromise the exercise of their functions at Aeris;
- External employment or any occupation similar to the activities performed at Aeris, which in any way affects its performance or which harms Aeris; and
- Execution of agreements with companies owned or managed by relatives or spouses.

Aeris prohibits hiring third-degree relatives (parents, grandparents, great-grandparents, children, grandchildren, great-grandchildren, uncles and nephews) with a hierarchical relationship or in the same area, as it understands that this is one of the ways to combat any conflict of interest related to job or salary promotions that do not occur fairly, but only by the degree of kinship.

The reason for this prohibition is that here at Aeris, we guarantee opportunities for hiring and career development in an isonomic way for all people, with attention to their peculiarities and characteristics.

It is essential that whenever there is doubt as to whether or not a situation represents a conflict of interest, the employee immediately informs the fact to their direct manager, the manager of the Human Resources area or the Legal Department, so that the situation is properly evaluated and for who can be guided on how to proceed.

F. Protection of Image and Reputation

It is through the conduct of our employees and managers that we create the image and reputation of Aeris. Thus, the conduct of

our team must reflect our Culture of Integrity, so that everyone cares for the company's image and reputation in the market, through our actions on a daily basis.

When witnessing an improper action by a co-worker, it is the employee's duty to advise the co-worker of the possible consequences of his/her actions, in order to avoid them, thus protecting Aeris' image and reputation. If you do not feel comfortable giving guidance, you can contact your manager or even the Reporting Channel.

G. Money Laundering and Combating the Financing of Terrorism

Money laundering is defined as the process of hiding and/or disguising the illegal origin of funds that are related to criminal activities (bribery, corruption, trafficking, smuggling, etc.), associating them with legitimate financial channels, in an attempt to legalize them, to leave them "clean". Hence the origin of the term "money laundering".

Terrorism consists of the practice of creating social or generalized terror through attacks against the life or physical integrity of one or more people, or promoting mass destruction.

The origin of which is usually due to reasons of xenophobia (prejudice against foreigners), discrimination or prejudice based on race, color, ethnicity, and religion, exposing people, property, public peace or public safety to danger.

It is very common for funds from money laundering to be used to finance terrorism.

For this reason, Aeris is committed to combating money laundering and terrorist financing, committing to comply with all legislation related to combating these crimes, any money laundering practices, income concealment or the use of accounting practices different from the legislation and accounting principles being unacceptable.

In this sense, it is the employee's duty to comply with all legislation applicable to the subject, as well as any and all Aeris policies, in order to comply with the Accounting, Financial and Tax rules required and to maintain the reliability of the records and financial reports of all payments made on behalf of Aeris

It is also up to the employee to remain attentive to any activity that indicates possible suspicious activities that may be related to money laundering, such as:

- Suppliers who are reluctant to receive payments on their own behalf;
- Atypical payments to the commercially established relationship;
- Triangulations involving more than one supplier (e.g.: payment for a product or service to a different supplier than the one that provided the service or supplied the product);
- Excessively complex or unfounded financial transactions;
- Payments made in cash; and
- Reimbursements made in amounts greater than what has been proven to be accepted.

H. Fraud

For the purposes of interpreting this Code, Fraud is any act or omission made intentionally to deceive one or more people with the purpose of harming them, usually to obtain some kind of advantage for their own benefit, unfairly and dishonestly, harming a person, group of people, or even a company. One of the most common examples of fraud concerns making a false statement or deliberately omitting, regarding a given situation, with the aim of misleading someone, in order to benefit from this error.

Aeris repudiates any and all types of fraud, both by its employees (regardless of hierarchical level) and by its partners and suppliers.

In this way, all employees and partners must reject and report (through the Aeris Reporting Channel) situations of fraud that may occur or that are already occurring in the company, whatever the type of fraud, even if it does not involve monetary amounts. For Aeris, any type of persuasion that leads an employee or partner to act improperly or illegally on behalf of the Company is intolerable, and financing, funding or sponsoring the practice of any and all illicit acts is strictly prohibited.

I. Financial Records

Aeris, since the first year of its founding, has been audited by the four largest auditing companies in the world and for this reason we have always encouraged the obligation to comply with the applicable accounting principles, as well as with Aeris Policies, so our records must always be full, faithful, complete and timely.

Any and all financial information of Aeris, especially its Balance Sheet and Annual Financial Statements, must faithfully reflect its actual equity, economic and financial situation, in accordance with current accounting principles and applicable international standards in terms of reporting and financial controls.

As Transparency is one of our Principles, no professional should hide or distort information in accounting and tax records, and financial reports, which must be complete, accurate and truthful.

j. Press Release

Any and all type of press release or releases intended to employees, will be structured based on the guidelines of the Aeris Press Office/Communication area, which is expert in this type of content.

As this is sensitive information that has a direct impact on Aeris' image, information and statements made to the press must be given exclusively by professionals designated by Aeris.

Any supplier (regardless of job title or hierarchical position) who is sought to give interviews, explanations or statements to the press on behalf of Aeris, must direct the request to Communication area, bearing in mind that only this area and Aeris' legal representatives (such as officers, partners and members of the Board of Directors), or persons designated by them, may speak on behalf of the company. Whenever this occurs, the person who made the statement must (immediately) formalize its content to the Communication area.

Thus, it is the duty of employees to activate the Communication area when noticing the presence of the press, thus avoiding any type of undue disclosure of information, or not previously aligned with the people designated for that purpose.

3.2 Responsibility in our relationships with business partners

A. Suppliers

Aeris advocates and strives to establish an honest relationship based on legal and fair practices with its suppliers. In this sense, any and all acquisition of goods or services by Aeris must be made based on the Principles of Integrity and Impartiality, thus ensuring respect for this Code of Ethical Conduct and Aeris Policies.

We act with responsibility and respect for Human Rights, integrity and the environment in the context of relationships with our suppliers and partners, as well as understanding and identifying the treatment given by natural persons or legal entities suppliers to these issues.

We work so that our production chain stands out for the integrity, fair and sustainable way of conducting work, as well as for respect for Human Rights. To this end, Aeris will also be able to publicly and corporately recognize, prioritize or strengthen ties with those suppliers and partners that respect the rules and act according to the required and expected parameters.

Aeris employees are prohibited from hiring any supplier basing their decision on some personal reason, such as, for example, self favoring and favoritism or predilection based on interpersonal relationships. All Aeris suppliers must be selected based on the basic principle of prioritizing the best interests of Aeris, always based on quality, price and deadline criteria, thus obtaining the best cost-benefit ratio. Additionally, Aeris expects its suppliers to be aware of and comply with this Aeris Supplier Code of Conduct, as well as other Aeris Policies that apply to them. The selection of a supplier must also be associated with the analysis of its profile and adherence to the Aeris Culture.

Accordingly, all Aeris suppliers must:

- Respect the applicable legislation;
- Be compliant with their labor and financial obligations;
- Combat unfair labor practices, as well as child labor, regardless of the formats adopted or unfounded justifications that may be used by the supplier or partner;
- Curb acts of corruption by avoiding situations where resources are

used to avoid compliance with legislation; and

- Prioritize the health and safety of their employees. We understand that only with everyone's collaboration will we be able to act effectively in detecting and combating inappropriate relationships between employees and Suppliers and for this reason we count on your collaboration to report to your immediate manager, the Legal Department and the Integrity Committee any suspicious attitudes and problems relating to this topic.

b. Gifts and hospitality

b.1. Gifts receipt

- It is allowed, as long as it involves promotional objects, that have the logo of the person offering the gift, without exclusivity, and that have a commercial value of up to R\$ 200.00 (Two hundred Brazilian Reais).
- In case of receiving gifts of values above this limit, the Legal Department must be consulted;
- It is forbidden to receive gifts in monetary values, whatever the payment method;
- In cases of receiving invitations to participate in events on behalf of Aeris, the leadership must be immediately communicated, and this leadership must forward the invitation for analysis and opinion by the Legal Department, regarding the participation of the guest in the event, with the Legal Department being able to indicate another person, with a more suitable profile to represent the company at the event;
- Under no circumstances gifts in the form of alcoholic beverages may be accepted. If this happens, the respective drink will be delivered to the Legal Department, which will dispose of it appropriately; and
- Payments or receipts for travel, accommodation, daily rates and food are not allowed, except when they are related to the business or the employee's role, who must communicate this to their immediate manager, who, in turn, will take the case to analysis and opinion of the Legal Department.

b.2. Offer of gifts

- The practice of offering gifts follows the same limit of R\$ 200.00, and must be given through promotional objects and without exclusivity, with no need for prior authorization from the

company, if such offering occurs within the limits and criteria established in this Code, and detailed in the respective policy;

- It is up to the Communication area (or another area responsible for making gifts) to contact the Compliance areas of the companies to which you want to offer the gifts, in order to know the Gifts Policy and respective limits, so that the Aeris can adapt to the rules concerned, of our customers and partners; and
- These guidelines do not apply to draws at Aeris internal events and campaigns, which will follow specific internal regulations and aim to recognize the appreciation of our employees.

c.Fair Competition and Antitrust Laws

Aeris believes in and upholds free competition and free enterprise. In this sense, it respects and encourages that all actions related to Aeris are always in accordance with what determines the legislation for the defense of competition and combating the abuse of economic power.

To ensure effectiveness in complying with the applicable legislation, Aeris determines that the Aeris Employee is prohibited from:

- Make agreements with competitors in order to set prices, adjust proposals, set salaries, demarcate markets or consumers; and
- Provide, receive or exchange the following information with any competitor:

- 0 Prices;
- 0 Production, capacity, sales volume;
- 0 Costs;
- 0 Profits;
- 0 Margins;
- 0 Sales strategy;
- 0 Photos of the production area

d.Government and Public Officers

Aeris values ideological and party independence, within the law, and in this sense conducts its relationship with public officers from all spheres based on the principles of ethics, transparency, honesty and respecting the public interest, in addition to the following principles:

- Face-to-face or remote communications carried out frankly and clearly;
- Comply with the legislation and regulations of the different instances of the public authorities, applied to the Aeris market segment;
- Intolerance to situations involving the receipt or offering of monetary values or any other type of resource or benefit to public officers, not accepting any arguments that try to justify a fact that by itself will violate the basic principles of Aeris ethics and integrity; and
- Ensure that the relationship or any type of communication with public officers is strictly formal and open, bearing in mind that it should only be based on what governs the law, and for this reason, there is no reason for it to be done in a hidden, discreet manner.

E. Combating bribery and corruption: demanding and accepting benefits.

E.1. Improper payments and donations to public authorities

Aeris is committed to competition in a loyal and fair manner and, therefore, vehemently prohibits its employees, when they relate to public authorities, directly or indirectly, including political parties, from offering, promising, granting, authorizing or making payment of money or offers of gifts and donations to a public authority, with the aim at obtaining any type of advantage, influence or benefit in any type of business.

As a public authority, we can define any manager or employee of any government entity.

Aeris has specific policies that regulate donations and gifts that can be offered to public authorities, and which, therefore, must always be observed, thus ensuring that no conduct by Aeris is interpreted as an illegal attempt at bribery. Thus, it is the duty of Aeris employees:

- Under no circumstances, promise, grant, authorize any payment or donation of anything of representative value to any public authority with the aim at obtaining any type of advantage;
- Comply with Aeris Policies regarding permitted donations and gifts to public authorities; and
- Remain alert and report any sign that represents illegal conduct regarding payments, gifts and offers related to public authorities

E.2. Receiving gifts and favors by Aeris employees

It is forbidden for Aeris employees to use their function or position in the company to demand, accept, obtain or receive any type of benefit of personal interest in their relationships with commercial, existing and/or potential partners.

Any type of gift, payment, even if in the form of courtesies, that may indicate any type of influence or counterpart in the existing commercial relationships between Aeris and the partner is prohibited. This prohibition does not include occasional courtesies of symbolic and unrepresentative value.

When there are doubts about what may or may not be acceptable, the ideal is to refuse the offer, and then contact the Legal Department, responsible for Compliance, to clarify any possible doubts.

F. Donations and sponsorships

It is through donations and sponsorships that Aeris contributes to a more just and supportive society, sharing opportunities between individuals and institutions, as well as for the development of research, intellectual production with technological, sustainability, art, culture and education objectives, among others.

It is worth mentioning that both donations and sponsorships must not have secondary interests, respecting the legislation and regulations of the sector in which Aeris operates, without any type of undue advantage for any of the parties.

Any circumstances other than those described above must be communicated to the Legal Department, responsible for the Compliance area.

G. Unions and Class Associations

In relationships between Aeris, Class Associations, Unions and Factory Commission, there must be mutual respect, preserving the corporate and care environments, as well as the integrity and privacy of its members and employees.

Thus, it is the duty of Aeris employees and partners:

- Maintain an environment of respect and cordiality between the parties, complying with collective-bargaining agreements and conventions;
- Respect and recognize the legitimacy of unions and class associations; and
- Respect and not discriminate unionized employees.

3.3 Social Responsibility

A. Sustainability

Aeris, by its essence, is a company that believes that sustainability is the fundamental requirement for the economic progress and success of its activities, complying with the standards established in the applicable environmental regulations, minimizing the impact of its activities on the environment.

Therefore, our work includes measures or actions to protect the rights of communities and professionals, and goals can be established that strive for respect in the socio-environmental, integrity and Human Rights scope, and even carry out a public consultation with the community surroundings, in relation to such measures or actions.

B. Maintenance, Protection and Respect for the Environment

Aeris supports the maintenance, protection and respect for the environment, and ensures compliance with environmental legislation wherever it operates. For this reason, Aeris adopts practices to reduce pollution and waste, promote energy and water savings, and conserve natural resources, preparing and executing research and development projects that promote environmental protection.

C. Protagonism in the community

Aeris develops and encourages its employees to also develop their exercise of citizenship with the community.

Aeris is always committed to collaborating with the community in the most diverse sectors: health, education, leisure and culture and for this reason, it maintains in its calendar the preparation of programs and constant social actions with the community. In addition, we maintain dialogue and initiatives that ensure the security of the territory and the populations directly and indirectly affected by the company's business.

D. Respect for Human Rights, Diversity and Social Inclusion

Aeris repudiates all forms of forced labor or in conditions similar to slavery, as well as repudiates child labor, regardless of the format or justification (unfounded by nature) used.

If it is identified, by our suppliers or commercial partners, the use of labor that disrespects Human Rights, such as those mentioned above, Aeris will terminate the contract concerned, and will report the disrespect, whatever the format, to the competent authorities, so that the penalties provided for by law are adopted. Aeris reinforces its commitment to the fundamental human rights recognized in national and international legislation, respecting and caring for them in all its activities.

In this way, we provide an environment of inclusion, adopting measures that allow and guarantee equal treatment to all people, regardless of physical, ethnic, racial or gender differences, in the stages of hiring, training, treatment and career development.

4. Requirement for Preventing and Combating Nonconformities

It is the duty of every employee to combat and report any actions that indicate possible violations of laws, Aeris Policies and this Code of Conduct.

Employees may report such violations to their immediate manager, the Legal Department, the Ethics and Integrity Committee and the Aeris Reporting Channel.

In addition to our employees, our partners, customers, suppliers and society in general can also use the Aeris Reporting Channel to report cases of conduct and procedures contrary to the law, in violation of this Code and other company rules.

A. Reporting Channel

Aeris has an outsourced Reporting Channel, as a way of guaranteeing secrecy and anonymity to the complainant, who can report it through the website www.canaldedenuncia.com.br/aeris or through **0800-882-0611**.

If registration is done via website, it is possible to attach audio files, videos, photos, and even other types of documents, in DOCX, XLS, CSV, PDF, PNG, JPG, MP4, WAV, PPT, TXT extensions, up to 1 GB in size. When registering a report, either through the website or the 0800 number, a six-digit protocol number will be informed, so that the complainant can follow the development of the analysis of the complaint, if they wish.

For those who made the complaint through the 0800 number, with the protocol number it is also possible to access the system and include evidence such as image, audio, video files, etc.

When reporting, Aeris guarantees you the maximum possible secrecy and that no retaliation will take place as a result of your report. However, if the complainant wants to identify themselves, their identity will still be kept confidential.

Aeris has the principle of zero tolerance for unethical conduct and informs that any employees who practice violations of the law, Aeris Policies and this Code of Conduct will be subject to the appropriate disciplinary measures, including from a warning to the possible termination of the employment agreement (dismissal for cause).

A. Application of Disciplinary Measures

Aeris will take the necessary steps for the effective application of this Code of Conduct. No one, regardless of their hierarchical level or position, is authorized to ask a professional to commit an illegal act, or to violate any of the provisions of this Code. Likewise, no professional can justify inappropriate, illegal conduct, or conduct that is contrary to this Code, under the order of a hierarchical superior.

The application of disciplinary measures for violation of the Code of Conduct, non-compliance with the law or Aeris Internal Policies, according to the verification of the evidence and conclusions of the investigative processes provided by the Committee and by the Ethics Commission, will be carried out by the HR Area, in compliance with the provisions of the current labor legislation, Policy for the Application of Disciplinary Measures, foreseen contractual sanctions and provisions in collective labor rules, when applicable.

C. Acceptance of this Code

Aeris professionals expressly accept the rules of conduct established in this Code of Conduct. Compliance with this Code is mandatory for all professionals who make up or will join Aeris.

Employment and service agreements must contain a clause with an express obligation to comply with the Code of Conduct.

Through training, Aeris professionals will be trained and periodically updated in relation to the disciplined content in this Code. In addition, the Ethics Committee will approve periodic internal communication actions.

d. Review and approval of this Code and Training

This Code will be revised annually, based on the Annual Report of the Compliance System, as well as suggestions and proposals made by Aeris professionals to the Ethics and Legal Committee, which may formulate proposals for improvement of the Aeris Code of Conduct. The Ethics Committee and the Board of Directors are responsible for the effective application of the provisions of this Code of Conduct. Any changes to this Code of Conduct must be approved by the Ethics Committee and the Board of Directors.

This Code was approved on March 3, 2020.

Term of Receipt and Commitment

By this term, I declare that I am receiving a copy of the Aeris Code of Conduct.

After reading and understanding its content, I agree with the principles and guidelines contained therein and assume the commitment to follow these principles and guidelines in my professional activities. I am aware that, as of this date, I must communicate to my immediate manager, the Legal Department or the Aeris Reporting Channel, about any and all situations that may characterize a conflict of interest, whenever necessary and at any time.

Thus, being fully aware of the content of the Aeris Code of Conduct, I undertake to ensure the strict application and compliance with all the conditions set forth in this Code, being subject to the disciplinary sanctions provided for in case of non-compliance.

Company's Name _____

Signature _____

Name and Position _____

CNPJ _____ Date and Place _____