



Program for
Integrity

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Code of Conduct

Review 02 - August / 2020







Message from the President



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

When assuming the position of an ethical company, we commit to respect the rights of individuals, of the environment, of society and to fight against any and all types of corruption.

In this sense, Aeris Code of Conduct plays an important role in guiding the behavior and conduct of all of us, Aeris' employees, including Board members, directors and managers, which are equally committed to compliance with this document.

The Aeris Code of Conduct represents much more than a list of standards: in fact, it is the personal commitment of each one of us to act ethically and care for the reputation of Aeris as a honest company.

Finally, we hope you, Aeris' employee, make a difference in multiplying 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 business partner.

If any doubts arise in your day-to-day about how to behave, or what action to take in any situation, do not hesitate to seek help from your manager, the Ethics Committee or the Legal Department: We guarantee you the security of confidentiality and non-retaliation.

Alexandre Sarnes Negrão
President

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1. Values and Principles

a. Conduct and the law



We have as a fundamental principle respect for the laws. Therefore, obedience to the legal systems and policies of Aeris, is the basic requirement of an honest conduct and should always be prioritized in any circumstance.

The employee who commits any violation of Aeris laws or 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.

We hope that our employees, in the exercise of their activities, both in the environment of internal cooperation (dealing with other co-workers), as in the relationship with external partners ("as customers, suppliers and business partners), show respect for all these people, without practicing any kind of discrimination by gender, nationality, age, physical capacity, religion, color, or any other aspect of diversity.

Hiring and promotions within Aeris are made by meritocracy and for this reason we prohibit any hiring, compensation and/or firing employees based on sexual orientation, age, ethnicity, nationality, religion, union membership, political partisanship, or physical disability.



c. Right to privacy



We understand that employees' privacy rights must be a subject of constant respect and , for this reason, we guarantee the treatment of personal data in accordance with the Aeris Privacy Policy and in compliance with applicable laws.

Within legal limits, Aeris has the right to supervise and control the e-mails of its employees", as well as the use of the Aeris internet network, therefore, all communications via e-mail or any other application that uses Aeris hardware and software resources, that are received or sent, will be treated as information owned by Aeris and for this reason, are subject to control, access, recovery and investigation by Aeris.

In this sense, Aeris' employees are prohibited from using the equipment or resources provided by Aeris, requiring any privacy rights other than those provided for in the applicable legislation.

d. Protection against harassment

Aeris encourages the principle of zero tolerance for any type of harassment, regardless of how it manifests: through personal contact, in writing or through words.

We understand that a healthy work environment is an environment free from harassment and therefore we must take an active role in combating any types of conduct that may be offensive or that in any way may make people feel harassed: pejorative nicknames, intimidations, unwanted physical contacts,

improper gestures, slander, defamation, insult, intimidation, aggressive behavior and derogatory jokes. Such conduct is strictly prohibited in the Aeris work environment.

e. Health and Safety

Ensuring the health and safety of our employees in the work environment 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:

- ◆ Know and comply with the measures and procedures adopted by Aeris in the prevention of accidents at work;
- ◆ Take care of your personal protection and the protection of your co-worker;
- ◆ Contribute to the multiplication of knowledge of the measures and procedures adopted by Aeris in the prevention of accidents at work; and
- ◆ Immediately report situations that present any potential risk to health or safety.

2. Obedience Requirements

a. Who should obey this Code

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

All Aeris' employees who interface with third parties, whether they are customers, suppliers and/or independent service providers, should be committed to making these third parties know the Aeris Code of Conduct, always providing them with all the necessary instructions to avoid any kind of non-compliance with Aeris Policies.

b. The role of managers

It is the duty and responsibility of every manager to be an example of integrity towards their employees, through their personal conduct, in the exercise of their functions and mainly through their supervisory duty, which aims to ensure that there are no breaches of this Code and Aeris Policies.

Managers are responsible for all employees who are under their management, and, therefore, should have an active role in the multiplication of knowledge and the rooting of the Culture of Integrity in all of them.

Managers are responsible for maintaining 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 this sense, being a honest manager includes:

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

It is important to mention that the responsibilities of managers do not exempt employees from their own responsibilities, and that they remain responsible for the personal fulfillment of each of the rules of this Code.

3. Liability 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 phones,

computers, software, internet network, copiers, e-mail systems, among other equipment and devices.

The use of Aeris assets must be limited exclusively to the exercise of the professional activities of employees, for the benefit of Aeris and never aiming at the personal favor of those who use them and , for this, they must be the object of permanent care and zeal, aiming to prevent them from suffering any damage, theft or loss.

Thus, the work tools and materials made available by Aeris must not be taken to the external environment of the company, except if duly authorized, in accordance with the current Policies. In this way, to prevent inappropriate conduct, Aeris can carry out searches on its employees (following due respect for intimacy, for the honor and image of employees) without prior notice, in order to prevent deviations from tools, equipment and or materials.

Under no circumstances will the employee be able to use Aeris assets to perform acts that constitute any kind of violation of this Code of Conduct and Aeris Policies.

b. Confidential information

For us it is also the duty of everyone to respect the rights of protection and confidentiality of confidential information owned by Aeris. Among these we can consider any and all confidential information to which the employee may have access due to the work they do or the position they occupy.

The importance of respecting the confidentiality of confidential information consists in the fact that it may contain data that, if shared with people who should not have access to it, may cause great damage to Aeris, for

your 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 technical sheet; and
- Customer data and technical information.

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

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

c. Disclosure of information, privacy and security

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

Aeris Data Classification and Privacy Policies set out the necessary guidelines for treatment,

Use and disseminate Aeris information. It is up to all employees to know and apply them, because 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 them for the benefit of Aeris itself, their use for purposes is prohibited personal. Its disclosure, 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 still, by sharing information made by Aeris itself on the media and on Social Media.

d. Aeris and Third Party intellectual property rights

It is the duty of every employee to respect and protect Aeris' intellectual property rights as well as that of third parties. Under no circumstances is it permitted to obtain or share sensitive data from third parties, in particular customers and business partners.

In the same way that we must look after Aeris confidential information, you must 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 elaborated. When something created by them is made available to Aeris, is precisely because of the relationship of mutual trust that we have with these agents.

Thus, we cannot use it without your permission, much less commercialize-la or have it as a participant in any type of commercial relationship, without being previously and

formally authorized by them and by Aeris' managers. Respect and Transparency are fundamental in our business relationships with our customers and business partners.

When it comes to work carried out with total or partial involvement by Aeris, or in your name, regardless of the relationship that gave rise to it, which implies intellectual creation, 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, that must activate the Legal, to take the necessary steps.

e. Conflict of Interests

It is expected that Aeris' employees always make their decisions prioritizing the best interests for Aeris, in this sense, there is a conflict of interest when the personal interests of employees are opposed to the interests of Aeris.

Employees can get involved in conflicts of interest in different situations, from among them:

- Personal business relationship with any competitor, Aeris 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 carried out at Aeris, which in any way affects its performance or that harms Aeris; and
- Conclusion of contract with companies owned or managed by relatives or spouses.

Aeris prohibits the hiring of relatives up to third degree with hierarchical relationship or in the same area, for understanding that it is one of the ways to combat any conflict of interest related to job or salary promotions that do not occur in a fair manner, but only by the degree of kinship.

It is essential that whenever there is doubt whether any situation represents a conflict of interest or not, the employee immediately inform the fact to his direct manager, to the manager of the People and Management area or to the Legal Department , for the situation to be properly assessed and so that you can be guided on how to proceed.

f. Image Protection and Reputation

It is through the conduct of our employees and managers that we create the image and reputation of Aeris. So, the conduct of our team must reflect our Culture of Integrity, so that everyone watches over the image and reputation of the company before the market, through our actions on the day-to-day.

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

g. Money laundering and combating terrorist financing

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

Terrorism consists of the practice of creating social or generalized terror through attacks on the life or physical integrity of one or more people, or promoting mass destruction. Its origin is usually due to xenophobia (prejudice against foreigners), discrimination or prejudice of race, color, ethnicity and religion, exposing to personal danger, patrimony, public peace or public safety.

It is very common for funds from money laundering to be used to finance terrorism. In this sense, Aeris is committed to combating money laundering and terrorist financing, committing itself to comply with all legislation related to the fight against these crimes, being unacceptable any practices money laundering, collecting revenue or using different accounting practices than governing legislation and accounting principles.

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 rules, Financial and Tax requirements and maintain the reliability of the financial records and reports of all employees. 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, as for example:

- Suppliers who are reluctant to receive payments on their own behalf;
- Atypical payments to the commercially established relationship"; Triangulations involving more than one supplier (ex: payment of a product or service to a supplier other than the one who provided the service or provided the product).
- Excessively complex or unfounded financial transactions; Payments made in cash; and
- Refunds made in amounts greater than what has been proven accepted.

h.Frauds

For the purposes of interpreting this Code, Fraud is any act or omission done intentionally to deceive one or more people for the purpose of harming them, generally to obtain some kind advantage in self-benefit, justly and dishonestly, harming a person, group of people, or even a company.

One of the most common examples of fraud relates to giving false declarations or to omitting purposefully, as for the given situation, with the intention of inducing someone to error, so as to come if benefit from this error.

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

In this way, all employees and partners must reject and report (through the Aeris Reporting Channel) fraud situations that may occur or are already occurring in the company, whatever the type of fraud, even if it does not involve monetary values.

For Aeris, any type of persuasion that leads an employee or partner to act improperly or illegally on behalf of the Company is intolerable, being vehemently prohibited the financing, costing, or sponsorship the practice of any and all types of unlawful acts.

i. Financial Records

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

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

In this sense, no professional should hide or distort information in accounting and tax records, and financial reports, that must be complete, accurate and true.

j. Communication and Declarations to the Press

All and any type of communication intended for employees and the press must be structured based on the guidelines of the Aeris Press/Communication Area, who specializes in this type of content.

Because it is sensitive information that directly affects the image of Aeris, information and statements made to the press must be given exclusively by professionals designated by Aeris.

Any employee (regardless of position or hierarchical position) who is wanted to give interviews, explanations or statements to the press on behalf of Aeris, should direct the request to Communication area, bearing in mind that only this area and the legal representatives of Aeris (as directors, partners and members of the Board of Directors), or persons by designated, may speak on behalf of the company. Whenever this occurs, the person making the declaration must formalize (immediately) its content for the Communication area.

So, it is the duty of employees to activate the Communication area when they perceive the presence of the press, thus avoiding any type of improper information disclosure, or not previously aligned with people designated for both.

3.2 Responsibility in our relations with business partners

a. Suppliers

Aeris defends and endeavors to establish a healthy relationship, based on legal and fair practices with its suppliers. In this sense, any acquisition of goods or services by Aeris should be made on the basis of the Principles of Integrity and Impartiality, thereby guaranteeing respect this Aeris Code of Conduct and Aeris Policies.

It is forbidden for Aeris' employees to contract any supplier based on a personal basis, as for example, self-favoring and favoritism or predilection based on interpersonal relationships.

All Aeris suppliers must be selected with the basic principle of prioritizing the best interests of Aeris, always based on quality criteria, price and deadline, thus obtaining the best cost ratio benefit.

Additionally, Aeris expects its suppliers to know and comply with the 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. Therefore, all Aeris suppliers must:

- Respect the applicable legislation;
- Keep up with your labor and financial obligations;
- Combat unfair work practices, as well as child labor;

- Prevent acts of corruption; and
- Prioritize the health and safety of its employees.

We understand that only with the collaboration of all of us 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 gest, to the Legal Department and to the Integrity Committee, any suspicious attitudes and problems related to this topic.

b. Gifts, Presents and Hospitality

b.1. Receipt of gifts

- It is allowed, provided it involves promotional objects, who have the logo of the person who is offering the gift, without exclusivity, and have commercial value of up to R\$ 200,00 (Two hundred Reais);
- If you receive gifts of amounts above this limit, the Legal Department, should be consulted;
- It is forbidden to receive gifts in monetary values, any form of payment;
- In cases of receiving invitations to participate in events on behalf of Aeris, the leadership must be immediately communicated, and this leadership should forward the invitation for analysis and legal opinion, while the participation of the guest in the event, the Legal can appoint another person, with the most appropriate profile to represent the company at the event;

- Under no circumstances may gifts or presents be accepted in the form of alcoholic beverages. If this happens, the respective drink must be delivered to the Legal Department, that will give the appropriate destination; and
- Payments or receipts for travel, housings, day and food are not allowed, except when related to the employee's business or function, which you must communicate to your immediate manager, who in turn, will take the case for analysis and opinion by the Legal Department.

b.2. Offering free gifts

- The practice of offering gifts follows the same limit of R\$ 200,00, and must be done through promotional objects and without exclusivity, not being necessary the prior authorization of the company, if such offer 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 the gifts are to be offered, with the intention of knowing the Gifts Policy and respective limits, so that Aeris can adapt to the rules in question, of our customers and partners; and
- These guidelines do not apply to sweepstakes at Aeris internal events and campaigns, what will follow specific internal regulations and aim to recognize the appreciation of our employees.

c. Fair competition and antitrust laws

Aeris believes and defends free competition and free enterprise. In this sense, it respects and encourages that all actions related to Aeris are always in accordance with the legislation that defends competition and combats the abuse of economic power.

To ensure effectiveness in complying with applicable legislation, Aeris determines that Aeris' Employees are prohibited:

- Make agreements with competitors with the aim of fixing prices, adjusting proposals, fixing salaries, marking markets or consumers; and
- Provide, receive or exchange the following information with a competitor:
 - Prices;
 - Production, capacity, sale volume;
 - Costs;
 - Profits;
 - Margins;
 - Sales strategy;
 - Photos of the production area.

d. Government and Public Agents

Aeris values ideological and party independence, within legality, and in this sense conducts its relationship with public agents from all walks of life 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 in a frank and clear manner;
- Comply with the legislation and regulation of the various instances of public authorities, applied to the Aeris market segment; Intolerance of situations involving receipt or offering of monetary values or any other type of resource or benefit to public agents, not being accepted by Aeris any argument that tries to justify a fact that, by itself, comes to hurt the basic principles of ethics and integrity of Aeris; and
- Ensure that the relationship or any type of communication with public agents is strictly formal and open, bearing in mind that it should only be based on what the law governs, and for this reason, there is no reason why it should be done in a hidden way, discreet or on the sly.

e. Fighting bribery and corruption: demanding and accepting benefits.

e.1. Undue payments and donations to public authorities

Aeris is committed to competition in a fair and fair manner and, for that reason, strongly prohibits its employees, when they relate to public authorities, whether directly or indirectly, including political parties, from offering, promising, giving, allowing or paying amounts or gifts and donations to a public authority, with the objective of obtaining any kind of advantage, influence or benefit in any type of business.

Public authority means 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, should always be observed, thus ensuring that none Aeris' conduct is interpreted as an illegal bribery attempt.

So, the Aeris' employee must:

- Under no circumstances promise, grant, authorize any payment or donation of anything of representative value to any public authority in order to obtain any kind of advantage;
- Comply with Aeris Policies regarding donations and gifts allowed to public authorities; and
- Stay alert and report any sign that represents illegal conduct regarding payments, gifts, and offers related to public authorities.

e.2. Receipt of gifts and favors by Aeris' employees

Aeris' employees are prohibited from using the function or position they occupy in the company to demand, accept, obtain or receive any type of personal interest benefit in their relationships with business partners, existing and/or potential.

Any type of gift, payment, even in the form of courtesies, which may indicate any type of influence or counterpart in existing commercial relations is prohibited

between Aeris and the partner; This does not fall under this ban on 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 Legal, responsibility for Compliance, to clear up any 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 research development, intellectual production with technological objective, of sustainability, art, culture and education, among others.

It is worth mentioning that donations and sponsorships should not have secondary interests, respecting the laws and regulations of Aeris' sector of activity, without any kind of undue advantage for any of the parties.

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

g. Trade Unions and Associations

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

So, Aeris' employees and partners must:

- Maintain an environment of respect and cordiality between the parties, complying with collective agreements and conventions;
- Respect and recognize the legitimacy of trade unions and trade associations; and
- Respect and do not discriminate against 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, fulfilling the standards established in the applicable environmental regulations, minimizing the impact of its activities in the environment.

b. Environment

Aeris supports protection and respect for the environment, and guarantees 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, elaborating 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 that reason, keeps on its calendar the elaboration of constant social programs and actions with the community.

d. Human Rights

Aeris repudiates all forms of forced or slave-like labor, as well as repudiating child labor.

Aeris reinforces its commitment to fundamental human rights recognized in national and international legislation, respecting and caring for them in all its activities.

4. Requirement to Prevent and Combat Non-Conformities

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

The employee may report such violations to his immediate manager, to the Legal Department, to the Ethics and Integrity Committee and to the Aeris Reporting Channel.

In addition to our employees, our partners, clients, suppliers and society in general can also make use of the Aeris Reporting Channel, to report cases of conduct and procedures contrary to the law, without compliance with this Code and other company rules.

a. Complaint Channel

Aeris has a third-party whistleblowing channel, as a way of guaranteeing the whistleblower's confidentiality and anonymity, who can make their complaint through the website www.canaldedenuncia.com.br/aeris or via the toll-free number **0800-882-0611**.

If the registration is done via website, it is possible to attach audio files, video, pictures, and even other types of documents, in DOCX, XLS, CSV, PDF, PNG, JPG, MP4, WAV, PPT, and TXT extensions, up to 1 GB in size.

When registering a report, whether on the website or on the toll-free number, a six-digit protocol number will be provided so that the complainant can monitor the development of the complaint analysis if he/she wishes.

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

When reporting, Aeris guarantees you the utmost secrecy and that no retaliation will take place due to your report. However, if the whistleblower wants to identify himself, still, your identity will be kept confidential.

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

b. Application of Disciplinary Measures

Aeris will take the necessary steps for the effective application of this Code of Conduct. Nobody, regardless of their hierarchical level or position, is authorized to ask a professional to commit an illegal act, or who violates any of the provisions of this Code. Likewise, no professional can justify inappropriate conduct, legal, or that contradicts this Code, under the order of a superior.

The application of disciplinary measures for breaches of the Code of Conduct, compliance with the law or the Internal Policies of Aeris, as per the verification of the evidence and conclusions of the investigative processes provided by the Committee and the Ethics Commission will be carried out by the People Area, observed the provisions of the current labor legislation, Policy for Application of Disciplinary Measures, provided contractual sanctions and provisions in collective labor standards, if any.

C. Acceptance of this Code

Aeris professionals expressly accept the rules of conduct set out in this Code of Conduct. Compliance with this Code is mandatory for all professionals who make up or become part of Aeris.

In employment and service contracts, there should be 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 content disciplined 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 reviewed annually, based on the Annual Compliance System Report, as well as suggestions and proposals made by Aeris professionals to the Ethics and Legal Committee, who can formulate improvement proposals for 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.

Statement of Reception 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 I undertake to follow those principles and guidelines in my professional activities. I am aware that, from this date, I must communicate to my immediate manager, to the Legal Department or the Aeris Reporting Channel Canal, about any and all situations that could characterize a conflict of interest, whenever necessary and at any time.

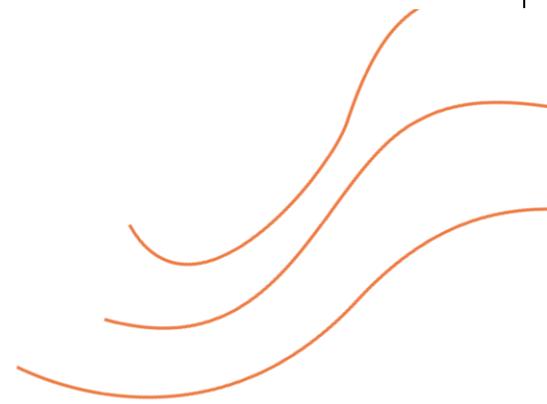
So, having full knowledge of the content of the Aeris Code of Conduct, commit myself to ensure the strict application and compliance with all the conditions set out in this Code, subject to the disciplinary sanctions provided for in case of non-compliance.

PLACE/DATE: _____

REGISTRATION: _____ **NAME:** _____

SIGNATURE: _____





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