

CODE OF CONDUCT FOR AERIS EMPLOYEES



INTEGRITY
PROGRAM



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MANIFEST

We exist to help build a more sustainable world powered by clean energy.

We strive daily to ensure the longevity of our business, generating consistent results.

We respect and value our employees and their families. They are the ones who make everything happen!

We value ethics and transparency in our relationships and when dealing with problems.

We are obstinate and always work towards the quality of our products and services.

We want to be recognized as the best supplier to our customers.

We know our social role and promote actions to develop our surroundings.

This is our belief, our way – THE WAY TO BE SO AERIS.



WORD FROM THE PRESIDENT

Aeris is a world-renowned company in the manufacture of wind turbine blades and, since its founding in 2010, has based its activities on 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 commit to respecting human rights, to acting responsibly in maintaining and protecting the environment, to guaranteeing the rights of the community in our business environment, as well as of society as a whole, and to combating any and all types of corruption.

In this sense, the Aeris' Code of Conduct plays a fundamental role as a guide to the behavior and conduct of all of us, Aeris employees, including Board members, directors and managers, who are equally committed to complying with this document.

Aeris' Code of Conduct represents much more than a set of rules: it is, in fact, the personal commitment of each one of us to act ethically and to safeguard Aeris' reputation as a company with integrity, which respects human rights and the environment, and which focuses on consistent and lasting results.

Finally, we hope that you, Aeris employee, make a difference by multiplying the content of this Code of Conduct, becoming an example of ethics and integrity, promoting the strengthening of the values necessary for Aeris to continue 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 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



**INTEGRITY
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1. VALUES AND PRINCIPLES



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1. VALUES AND PRINCIPLES

A. Conduct and the law

Our fundamental principle is respect for the law. Therefore, compliance with legal systems and Aeris policies is the basic requirement for honest conduct and must always be prioritized under any circumstances. Any employee who commits any violation of the 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 care about the impact of the company's activities on Human Rights. Therefore, we pay attention to and respect the dignity of the human person, regardless of whether it is directly or indirectly affected by the company's core or non-core activities, including the community and the company's surroundings. We expect our employees, in the exercise of their activities, both in the internal cooperation environment (when dealing with other coworkers) and in their relationships with external partners (such as customers, suppliers and business partners), to demonstrate respect for all these people, without practicing any type of discrimination based on 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 for all people, regardless of physical, ethnic-racial or gender differences, from the recruitment and selection stages to career development.

Hiring and promotions within Aeris are made based on 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 membership, political affiliation, physical disability or any other situation or condition that, in any way, may compromise equal treatment among people who work or act (regardless of the type of employment relationship) at the Company.



1. VALUES AND PRINCIPLES

C. Right to privacy

We understand that privacy rights, which are 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 Aeris' Privacy Policies and in compliance with applicable laws.

Within 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 Aeris hardware and software resources, whether received or sent, will be treated as Aeris proprietary information and, for this reason, are subject to control, access, recovery and investigation by Aeris.

In this sense, Aeris employees who use the equipment or resources made available by Aeris are prohibited from requesting any privacy rights other than those provided for in applicable legislation.



1. VALUES AND PRINCIPLES

D. 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 they are manifested (through physical contact, in writing or through speech), which can directly impact the physical and psychological health of the person affected, as well as 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 making possible changes to the company's internal policies and rules of conduct, such as this Code of Conduct, or even other effective remedial measures, if necessary.

Furthermore, in the performance of its activities, which includes its employees and business partners, Aeris is committed to:

- Do not violate the rights of your workforce, customers and communities and address the adverse human rights impacts of your activities;
- Prevent their activities from causing, contributing to or being directly related to negative impacts on human rights and environmental and social damage;
- Avoid impacts and harm to human rights arising from the activities of its subsidiaries and companies under its control or direct or indirect link;
- Communicate internally that your employees are prohibited from adopting practices that violate human rights;
- Guide associates, employees and people linked to the business society to adopt a respectful, friendly attitude and in compliance with human rights in the workplace;
- Ensure decent working conditions, through a productive environment, with adequate remuneration, in conditions of freedom, equity and security;
- Do not use child labor or work similar to slavery;
- Combat discrimination in employment relationships; and
- Adopt measures to prevent and remedy any type of harassment in employment relationships.

We understand that a healthy work environment is one free from harassment and, therefore, 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: derogatory nicknames, intimidation, unwanted physical contact, inappropriate gestures, slander, defamation, insults, aggressive acts and derogatory jokes. Such conduct is strictly prohibited in the Aeris workplace.

1. VALUES AND PRINCIPLES

E. Physical, psychological health and safety

Ensuring the physical and psychological health and safety of our associates 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 associates.

It is the responsibility of each of our associates:

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

Here at Aeris, we are concerned with adopting measures that promote decent, dignified work and that naturally lead us to treat our employees respectfully, from the perspective of Human Rights, diversity and inclusion. This also translates, for example, into ensuring reasonable hours and ideal working conditions, as well as respecting the minimum age for hiring professionals, including by our third parties.



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 business partners, suppliers, customers and society in general, including the community around us.

2. REQUIREMENTS OF OBEDIENCE



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2. REQUIREMENTS OF OBEDIENCE

A. Who must comply with this Code

Aeris' Code of Conduct must be followed by anyone working for or representing Aeris, including directors, managers and all other associates.

All Aeris employees who interact with third parties, whether they are 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 necessary instructions to avoid any type of non-compliance with Aeris Policies.



2. REQUIREMENTS OF OBEDIENCE

B. The role of managers

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

Managers are responsible for all associates under their management and, therefore, must play an active role in spreading knowledge and instilling a Culture of Integrity in all of them. Managers must maintain a clear discourse, based on honesty and transparency, ensuring that their employees feel in a safe environment to report any Compliance issues (related to lack of integrity or unethical behavior) without fear of retaliation.

Furthermore, managers must adopt measures to prevent and combat corruption, avoiding situations in which resources are used to avoid compliance with legislation or the illicit use of Company resources, which could be used, including, for the development of the community surrounding the company, its branches and subsidiaries.

In this sense, being an honest manager includes:

- Playing an active role in preventing, detecting and combating any acts of violation of this Code and any Aeris Policies;
- Being consistent with Aeris' Culture of Integrity: your attitudes must be consistent with your speech;
- Being an active voice on the importance and benefits of having integrity;
- Documenting and forwarding to the appropriate channels any Compliance issues (related to lack of integrity or unethical behavior) that you become aware of.

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



2. REQUIREMENTS OF OBEDIENCE

C. The Role of Senior Management and the Board of Directors

Senior management is responsible for establishing and overseeing the implementation of internal controls that ensure compliance with this Code and Aeris Policies.



3. ACCOUNTABILITY REQUIREMENTS



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3. ACCOUNTABILITY 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 enable greater efficiency and professional development of its employees. This includes telephones, computers, software, internet networks, copiers, email systems, and other equipment and devices.

The use of Aeris assets must be limited exclusively to the exercise of the professional activities of associates, for the benefit of Aeris, and never with the aim of personally favoring those who use them. Therefore, they must be subject to permanent care and attention, in order to prevent them from suffering any damage, theft or loss.

Therefore, work tools and materials provided by Aeris must not be taken to external company environments, except if duly authorized, in accordance with current policies.

Therefore, to prevent inappropriate behavior, Aeris may carry out searches on its employees (with due respect for privacy, honor, human dignity and the image of employees), without prior notice, with the aim of preventing the diversion of tools, equipment and/or materials.

3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

B. Confidential information

It is also everyone's duty to respect the rights to protect and confidentiality of confidential information owned by Aeris. Among this information, we can consider any and all confidential information to which the employee may have access due to the work they perform or the position they hold.

The importance of respecting the confidentiality of confidential information lies in 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, development strategies, equipment technical specifications and customer data and technical information.

It is necessary that all confidential information be expressly classified, so that it is kept secure and with access limited to only those people who need to know it.

In any case, we suggest that whenever you have any doubts about whether or not you are dealing with confidential information, you consult the Legal and Compliance Department, who will be able to assist you.



3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

C. Disclosure of information, privacy and security

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

Aeris' Privacy and Personal Data Protection Policies establish the necessary guidelines regarding the treatment, use and disclosure of Aeris information. It is up to all associates 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, and its use for personal purposes is prohibited, following the guidelines contained in the policies in question. Its disclosure, to any audience, in situations such as lectures, presentations or publications, may only be done after formal authorization from Aeris' Legal and Compliance Management or through sharing of information made by Aeris itself in the media and on social networks.



3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

D. Intellectual Property Rights of Aeris and Third Parties

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

In the same way that we must protect Aeris' confidential information, we must understand and respect the fact that information (about projects, products and/or services) created by customers and business partners took time, investment and dedication to be created. 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.

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

Therefore, it is the employee's duty to communicate to their immediate leadership any and all intellectual production that can be registered and protected. In turn, the leadership must communicate with the manager, who must contact the Legal and Compliance Department to take the necessary measures.

3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

E. Conflict of interest

Aeris employees are expected to always make decisions with the best interests of Aeris in mind. In this sense, there is a conflict of interests when the personal interests of employees are at odds with the interests of Aeris.

Associates must avoid becoming involved in conflicts of interest, such as the following situations, among others:

- Having a personal business relationship with any competitor, customer or supplier of Aeris;
- Hiring relatives as subordinates or in the same work area;
- Participating in parallel activities that compromise the exercise of their functions at Aeris;
- Outside employment or any occupation similar to the activities performed at Aeris, which in any way affects their performance or harms Aeris; and
- Entering into a contract with companies owned or managed by relatives or spouses.

Aeris prohibits the hiring of 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 due to the degree of kinship.

The reason for this prohibition is that, here at Aeris, we guarantee equal hiring and career development opportunities to all people, paying 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 reports the fact to their direct manager, the Human Resources manager or the Legal and Compliance Department, so that the situation can be properly assessed and so that they can be advised on how to proceed.

3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

E.1. Political or religious activities

Aeris is a secular company, which is not part of any specific religion, giving its employees the freedom to exercise their faith based on their religion. Thus, it maintains a position of neutrality and impartiality in relation to ideological currents, as well as respect for all religious beliefs, candidates for elective office (president, governor, mayor, etc.) and political parties.



Therefore, you should avoid participating in political, philosophical and religious demonstrations when carrying out your professional activities.

You can join political parties and run for political office, but in the latter case, you must notify the Reporting Channel, in a transparent manner, immediately after registering your candidacy with the Electoral Court. In this way, Aeris will know how to guide you so that your speeches with coworkers do not harm your work or to avoid any misinterpretation of a conflict of interest involving you, simply because you have run for elected office.

However, any association of the name Aeris with any candidacy is prohibited, whether during or outside working hours, regardless of the chosen means of dissemination.

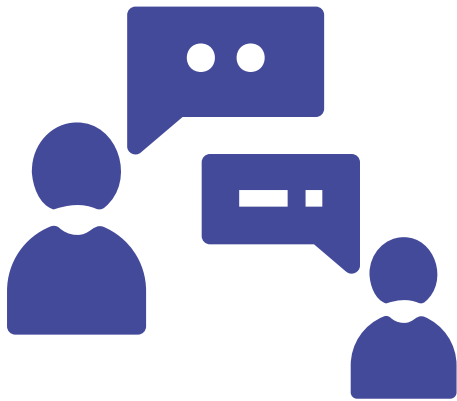
3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

F. Protection of image and reputation

It is through the conduct of our employees and administrators that we create Aeris' image and reputation. Therefore, our team's conduct must reflect our Culture of Integrity, so that everyone looks after the company's image and reputation in the market, through our day-to-day actions.



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

3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

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 resources 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 widespread terror through attacks on the life or physical integrity of one or more people, aiming to cause panic and instability in society. Terrorist financing involves the raising and use of financial resources intended to finance terrorist acts.

Understanding that Aeris does not accept any practice involving money laundering or terrorist financing activities, and that it should not, under any circumstances, benefit from illicit activities, it is necessary that all employees know and follow Aeris' Money Laundering and Terrorist Financing Prevention Policy, as well as applicable legislation, which must be observed whenever doing business or financial transactions with customers or partners.

Therefore, if the employee has any doubts regarding a transaction carried out or a client with whom they intend to establish a commercial relationship, Aeris recommends that the employee contact the Legal and Compliance Department, which will be able to guide them on how to proceed.

3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

H. Frauds

For the purposes of interpreting this Code, Fraud is any act or omission done intentionally to deceive one or more people with the purpose of harming them, generally to obtain some type of advantage for one's own benefit, in an unfair and dishonest way, harming a person, group of people or even a company. One of the most common examples of fraud involves making false statements or intentionally omitting a certain situation, with the intention of misleading someone and benefiting from that error.

Therefore, 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 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, and financing, funding or sponsoring the practice of any and all illicit acts is strictly prohibited.

3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

I. Financial Records

Since the first year of its foundation, Aeris has been audited by the four largest auditing companies in the world as a way of ensuring that our processes and internal controls are correct and in accordance with the legislation, following good governance practices, as well as requirements of the CVM (Securities and Exchange Commission), as we are listed on the B3 Stock Exchange, in order to provide greater transparency and security to our shareholders.

For this reason, we have always encouraged the obligation to comply with applicable accounting principles, as well as Aeris Policies, so that our records must always be complete, faithful, complete and timely.

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

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

If you are asked to do so, we would like to emphasize that this violates this Code of Conduct, so it is essential that we count on your help by reporting this behavior if it occurs.

3. ACCOUNTABILITY REQUIREMENTS

3.1

RESPONSIBILITY FOR WHAT IS OURS

1. Communication and Press Statements, Social Networks and Public Speaking

Any and all types of communication intended for employees and the press must be structured based on the guidelines of the Aeris Press Office/Communications area, which specializes in this type of content. As this is sensitive information that directly affects Aeris' image, 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 sought to give interviews, explanations or statements to the press on behalf of Aeris must direct the request to the Communications area, bearing in mind that only this area and the legal representatives of Aeris (such as directors, 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 formalize (immediately) its content to the Communications area, even if previously authorized.

Therefore, it is the employees' duty to contact the Communications department when they notice the presence of the press, thus avoiding any type of improper disclosure of information or information that has not been previously agreed upon with the people designated for this purpose.

If you are invited to give interviews, give lectures, seminars or prepare/present academic papers about Aeris or about subjects that include your area of expertise, you must request prior authorization from the Board of Directors. All requests for information from the media and requests for interviews must be sent to the Board of Directors, which, in turn, may consult the Legal and Compliance Department, so that the content and forms of the topics to be disclosed can be analyzed.

Always keep in mind that the following behaviors are prohibited here at Aeris:

- Participating in conferences, press releases and public forums using the name of institutions directly or indirectly, without knowledge and prior authorization and guidance from the Legal and Compliance Management;
- Acting on social media or in any means of communication, disrespecting Aeris' values; and
- Posting photos or videos in any condition that expose the Aeris logo or name in situations that may compromise its institutional image.

If the above behaviors are detected, the employee is subject to disciplinary measures, such as dismissal for just cause.

3. ACCOUNTABILITY REQUIREMENTS

3.1 RESPEITO À LEGISLAÇÃO E INTEGRIDADE DOS NEGÓCIOS

K. Use of Alcohol, Drugs and Carrying of Weapons in the Workplace

For Aeris, having a healthy, respectful, calm and balanced work environment is considered a premise for a job well done, and this is part of our Aeris Way of Being.



Carrying weapons on Aeris premises or in external activities related to the company is strictly prohibited, unless used as work tools by qualified professionals, acting as private security service providers.



We recognize that the consumption of legal and illegal drugs in the workplace is a serious health and safety issue that requires a clear position, which is why we require the following conduct from our suppliers, as we do from our employees:

1. It is prohibited to consume alcoholic beverages or use prohibited drugs on Aeris premises, under penalty of configuring serious misconduct and termination of the supply and/or service provision contract.
2. The consumption of alcoholic beverages is permitted at institutional events authorized by the Board of Directors, promoted by Aeris, such as end-of-year celebrations, if the supplier is a guest of Aeris.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

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 who work as our suppliers, to these issues.

We work to ensure that our production chain stands out for its honest, fair and sustainable way of conducting work, as well as for its 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.

In this sense, in our contracts with our suppliers, the Code of Conduct for Suppliers will always be included as one of the annexes to the contract, the acceptance of which, by the supplier, is an express condition for the supply contract, whether referring to a product or service, to be signed between the supplier and Aeris. Additionally, Aeris expects its suppliers to be aware of and also comply with the company 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.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

Therefore, all Aeris' suppliers undertake to:

- not violate the rights of your workforce, customers and communities and address the adverse human rights impacts of your activities;
- prevent their activities from causing, contributing to or being directly related to negative impacts on human rights and environmental and social damage;
- avoid impacts and harm to human rights arising from the activities of its subsidiaries and companies under its control or direct or indirect link;
- communicate internally that your employees are prohibited from adopting practices that violate human rights;
- guide associates, employees and people linked to the business society to adopt a respectful, friendly attitude and in compliance with human rights in the workplace;
- ensure decent working conditions, through a productive environment, with adequate remuneration, in conditions of freedom, equity and security.
- not use child labor or work similar to slavery;
- combat discrimination in employment relationships;
- adopt measures to prevent and remedy any type of harassment in employment relationships;
- respect the applicable legislation;
- be compliant with their labor and financial obligations;
- combat work practices that violate human rights, regardless of the formats adopted or unfounded justifications that may be used by the supplier or partner;
- prevent acts of corruption, avoiding situations in which resources are used to avoid compliance with legislation;
- prioritize the health and safety of their employees;
- combat sexual exploitation of children and adolescents
- guarantee the rights of traditional communities, such as indigenous, quilombola, and riverside communities
- guarantee the rights of migrant workers; and
- guarantee Human Rights, in all spheres and circumstances presented to them.

We understand that only with everyone's collaboration can we 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 and Compliance Management or the Reporting Channel, any suspicious attitudes and problems relating to this topic.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

A. Gifts, Presents, and Hospitality

A.1. Receiving gifts, presents, and hospitality

We know the practice of offering gifts and presents between customers and suppliers is part of the business environment. Here at Aeris we do not accept, offer, or promise gifts, hospitality, and entertainment that violate good commercial relationship practices and internal policies and standards on the subject.

Do you know the difference between a Gift and a present?

Gifts are promotional materials with no commercial value or with a value of less than BRL 200.00 (two hundred reais) received as a courtesy, advertising or regular publicity and which, for this reason, must contain the logo of the legal entity that granted the gift, such as diaries, calendars, keychains, pen drives, caps, t-shirts and pens, and can never cause embarrassment to Aeris or the professional, in the event that they are publicly known.

A present is any good, service, benefit or advantage that may or may not have financial value and that is given or received as a result of a commercial or institutional relationship, and for which the recipient does not have to pay the market value and which cannot be characterized as a gift.

On Gifts and Presents, you may receive them, as long as there is no promise of favoritism, advantage, influence or benefit in any type of business to the person offering them, always complying with the following rules:

- It is allowed to receive gifts, 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 and Compliance Management must be consulted;
- It is prohibited to receive gifts in monetary amounts, regardless of the 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 must forward the invitation for analysis and preparation of opinion by the Legal and Compliance Management, 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 and Compliance Management, which will ensure the appropriate disposal; 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 and Compliance Management.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

A. Gifts, Presents, and Hospitality

A.1. Receiving gifts, presents, and hospitality

Hospitality are services or expenses for transportation, food, accommodation, courses, seminars, congresses, events, fairs or entertainment activities, granted by a private agent, for example, a supplier, to an Aeris employee, as a way of strengthening a commercial relationship.

As an example, we can mention the situation in which a supplier creates a product or technology, or even builds a new factory in another state or country, and invites an employee from the operations and/or sales area to visit the new facilities, offering to cover the expenses of travel, accommodation and food for their client.

There are cases where the offer is genuine. However, in this type of practice, it is common to invite employees who have decision-making power or influence over a purchase or contract. In this type of situation, there is a very fine line between a serious commercial negotiation and an offer of hospitality with ulterior motives (so that the employee benefits the company).

So, when you come across this type of situation, remember the popular saying that “there is no such thing as a free lunch”, that is, possibly this hospitality is being offered with ulterior motives, to the detriment of Aeris. This second intention is not always clear or a possible “favor” is asked in return at the time. Therefore, our guidance for when you are faced with a situation in which you are being offered hospitality, before accepting it, contact the Legal and Compliance Management to report what happened and ask for the necessary guidance on how to proceed. Remember you are not alone and you do not need to feel uncomfortable, not even obliged to accept hospitality or even a gift from a supplier or even someone acting on behalf of a company that intends to be a supplier to Aeris. This is a serious subject and we are here to guide you, ok?!

For any reason, if it is unfeasible to refuse a gift (for example, it is customary in some Asian countries to offer gifts when closing a negotiation), you should consult the Legal and Compliance Management on how to proceed, taking the gift in question, and they will adopt the appropriate measures regarding its destination.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

A. Gifts, Presents, and Hospitality

A.2. Offering gifts, presents, and hospitality

Offering gifts is permitted, but you must pay attention to the following rules:

- 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.

Decisions on offering gifts and hospitality must always come from the Board of Directors, who may formally delegate this offer (by email, copying the Legal and Compliance Management) to any Aeris employee. Therefore, an employee may only offer a gift or hospitality on behalf of Aeris after formal authorization by email from a Director.

The offering of gifts, hospitality and entertainment to public officials is not permitted, with the aim of influencing a decision or that may cause any discomfort or embarrassment or impact on the image or reputation of Aeris, not even under the pretext of obtaining any type of favor for the company, as it would be a situation equally configured as a conflict of interest, and which is not permitted by Aeris.

To know and understand more details about the offering and receiving of gifts, presents and hospitality, you can consult the Gifts, Presents, and Hospitality Policy, available on the intranet.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

B. Fair Competition and Antitrust Laws

Aeris believes in 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 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:
 - Prices;
 - Production, capacity, sales volume;
 - Costs;
 - Profits;
 - Margins;
 - Sales strategy; and
 - Photos of the production area.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

C. Government and Public Agents

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

- In-person or remote communications carried out in a frank and clear manner;
- Comply with the legislation and regulations of the various instances of public authorities, applied to Aeris' market segment;
- Intolerance towards situations involving the receipt or offering of monetary amounts or any other type of resource or benefit to public agents, with Aeris not accepting any argument that attempts to justify a fact that, in itself, may violate Aeris' basic principles of ethics and integrity; and
- Ensure that the relationship or any type of communication with public agents is strictly formal and open, considering that it should only be based on what is governed by law, and, for this reason, there is no reason for it to be done in a hidden, discreet or covert manner.

Scheduling and scheduling meetings, appointments or other types of interactions with public agents must always be done formally, via corporate email.

If there are strategic interactions that are not in accordance with the guidelines set out in the specific policy for relationships with public agents, the person responsible must report the fact through the Aeris Reporting Channel, informing the date, location, time, agenda, participants and deliberations of the meeting held, by filling out a specific form.

It is not recommended to hold meetings, gatherings or other types of interactions with public agents in any environment other than the formal location of the headquarters of the corresponding public body, at the administrative headquarters of Aeris or at the specific headquarters of the project or event, where applicable.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

C. Government and Public Agents

C.1. Collaboration with possible investigations and inspections carried out by public bodies, entities or agent

We value total respect for investigations and inspections carried out by public bodies, entities or agents, requiring our employees to maintain transparent, respectful and fully cooperative conduct when called upon to provide clarifications or information to public bodies and agents.

In the event of an investigation, inspection or any other type of interaction carried out by a public agent, the interaction with the Public Administration must, whenever possible, be accompanied by more than one Aeris employee, carried out during business hours and in a professional environment. The Legal and Compliance Management must be contacted immediately, so that it can assess whether or not to send a member of the legal team to accompany and support the employee.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

D. Combating bribery and corruption: demanding and accepting benefits

D.1. Undue payments and donations to public authorities

Aeris is committed to fair and just competition and, therefore, vehemently prohibits its employees, when they have relationships with public authorities, directly or indirectly, including political parties, from offering, promising, granting, authorizing or making payments of amounts or offering gifts and donations to a public authority, with the aim of 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 an Aeris employee is interpreted as an illegal attempt at bribery. Therefore, it is the duty of the Aeris employee:

- Under no circumstances promise, grant or authorize any payment or donation of anything of significant value to any public authority with the aim of obtaining any type of advantage;
- Comply with Aeris policies regarding donations and permitted gifts to public officials; and
- Remain alert and report any signs that represent illegal conduct regarding payments, gifts and offers related to public authorities.

D.2. Receiving presents and favors by Aeris employees

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

Any type of gift or payment, even in the form of courtesies, that may indicate any type of influence or consideration in the commercial relations existing between Aeris and the partner is prohibited. Occasional courtesies of symbolic and unrepresentative value do not fall within this prohibition.

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 doubts.

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

E. 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 and intellectual production with technological, sustainability, art, sports, culture and education objectives, among others.

It is worth noting that both donations and sponsorships must not have secondary interests, respecting the legislation and regulations of Aeris' sector of activity, without any type of undue advantage for either party. For further details, please consult the Donations and Sponsorship Policy.

It is important to emphasize that this same ethical rigor and transparency applies to the receipt of donations and sponsorships by Aeris, and is not limited to just offering them. As with contributions made, donations and sponsorships received by Aeris must be free of secondary interests and aligned with the organization's principles of legality and integrity.

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

3. ACCOUNTABILITY REQUIREMENTS

3.2

RESPONSIBILITY IN OUR RELATIONS WITH BUSINESS PARTNERS

F. Unions and Class Associations

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

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

- Maintain an environment of respect and cordiality between the parties, complying with collective agreements and conventions;
- Respect and recognize the legitimacy of unions and professional associations; and
- Respect and do not discriminate against unionized employees.
- All employees are free to join unions and professional associations.

3. ACCOUNTABILITY REQUIREMENTS

3.3

RESPONSIBILITY FOR HEALTH, SAFETY AND THE WORK ENVIRONMENT



Our employees must comply with national legislation and current international standards regarding Occupational Health and Safety, as well as the Aeris Safety Policy and the specific certifications required (when applicable), observing the precautionary principle in activities, promoting responsibility and awareness among all those involved. To do this, they must follow all guidelines and requirements from the area responsible for Health and Safety at Work.

They must also identify, monitor and record the risks associated with their specific work activity and functions, establishing prevention, reduction and continuous improvement measures. Aeris is concerned with guiding and training its employees and providing them with the means and equipment for their individual protection, ensuring adequate working conditions and defining accident management and emergency preparedness measures, appropriate to the type of activity, location and circumstances, complying with the requirements of the Aeris Health and Safety Policy, when working at Aeris or Aeris Service facilities.

3. ACCOUNTABILITY REQUIREMENTS

3.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA



Also known as ESG, an acronym that stands for Environmental, Social and Governance practices, this term was created in 2004, in a publication by the Global Compact in partnership with the World Bank entitled *Who Cares, Wins*. ESG/ESG criteria have been widely discussed over the last three years, and their practices are demanded by society, especially in relation to companies that are pioneers in their area of activity, as is the case of Aeris, which has been working hard on these topics since 2010.

ESG/ESG criteria are fully related to the 17 Sustainable Development Goals (SDGs), which we will discuss further below. As a company that cares about these issues, we present below how we act on each of these pillars, counting on the participation of our employees so that these issues continue to be part of our daily lives, under the care of each Aeris employee.

3. ACCOUNTABILITY REQUIREMENTS

3.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

A. Environmental

A.1. Sustainability

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

By producing clean, safe and renewable energy, Aeris confirms its commitment to environmental conservation and the planet's climate balance. Sustainability is part of the essence of the company, which has been a signatory to the United Nations (UN) Global Compact since 2018. Adherence to the Pact also demonstrates Aeris' commitment to contributing to the 2030 Agenda, proposed by the UN in 2015, consisting of 17 Sustainable Development Goals (SDGs) and 168 targets, to be achieved by global society by the beginning of the next decade.

In 2020, based on the study of initiatives already developed and their potential contribution to the Agenda, Aeris defined seven of the Sustainable Development Goals (SDGs) as priorities, to which it has directed greater efforts, as listed below:



Thus, our work includes measures or actions to protect the rights of communities and professionals, and goals can be established that prioritize respect in the socio-environmental sphere, integrity and Human Rights, including carrying out public consultations with the surrounding community in relation to such measures or actions.

3. ACCOUNTABILITY REQUIREMENTS

3.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

A. Environmental

A.2. Maintenance, Protection and Respect for the Environment

Aeris supports the maintenance, protection and respect of the environment, ensuring 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, developing and executing research and development projects that promote environmental protection.

Aware of the environmental impacts of its operations on the ecosystem, Aeris carries out internal and external audits annually, seeking to keep its activities in compliance with current legislation. The units in operation, as well as the projects being implemented, follow environmental guidelines based on the National Environmental Policy (Federal Law No. 6.938/81), NBR ISO 14001, the standard in which the company is certified, and the Environmental Management System Policy itself.



Aeris adopts the following environmental guidelines:

- identify environmental aspects and impacts, defining plans for reduction;
- protect biodiversity (flora and fauna);
- consciously reduce the use of natural resources (water and energy);
- reduce waste generation, in addition to recycling and reusing; and
- develop a socio-environmental culture with stakeholders.

The company also carries out periodic awareness campaigns, through Daily Health, Safety and Environment Dialogues and commemorative dates such as Environment Day, Water Day, Earth Day, among others. Being honest also means maintaining, protecting and respecting the environment, and we encourage this in our employees. Thus, we are building a better future for the next generations.

3. ACCOUNTABILITY REQUIREMENTS

3.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

B. Society

B.1 Protagonism in the community

Aeris develops and encourages its employees to exercise citizenship within the community. As a result of Aeris' commitment to the community where it operates and in line with the United Nations (UN) Sustainable Development Goals (SDGs), the Company works to develop corporate social responsibility and sustainability policies.

Since the beginning of its operations at the Pecém Industrial and Port Complex in 2010, Aeris understood that the surrounding region, especially the municipalities of Caucaia and São Gonçalo do Amarante, needed social projects and initiatives focused on community development.

In 2020, a diagnosis was performed that listed the main demands of the surrounding communities. Aeris then created the Social Intelligence Committee, made up of employees from different areas and backgrounds, with the aim of rethinking, proposing and assisting the Social Intelligence area in implementing programs and actions, which are monitored by the Board, for example of Escola Aeris (focused on primary and secondary education), the granting of access to the Aeris University (online professional qualification platform with 26 professional courses for young people and adults), by people from the community surrounding the Company, the Volunteering Program, of the Ventos do Saber Project (whose mission is to transform public school libraries into leisure and coexistence spaces, in addition to carrying out educational activities with a focus on reading) and the Triathlon School (which provides the practice of sport through the modalities Swimming, Cycling, and Running).

Aeris is always committed to collaborating with the community in the most diverse sectors: health, education, sports, 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.

3. ACCOUNTABILITY REQUIREMENTS

3.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

B. Society

B.2 Respect for Human Rights, Diversity and Social Inclusion

Aeris does not practice nor allow the practice, within its sphere of activity, of acts that violate the laws, norms, rules and regulations in force in the Brazilian legal system or even in this Code of Conduct, which constitute a violation of human rights.

In this sense, we make every effort to prevent, mitigate and eradicate inappropriate conduct in our work and that of our employees and business partners of any nature, basing our activities on the best market practices, with regard to respect for human rights, diversity and social inclusion, combating prejudices with regard to race, color, religious belief, sex, age, sexual orientation, gender, philosophy of life, political ideology, disability or physical and/or mental limitation, way of dressing, speaking, physical appearance, financial condition, schooling and all forms of expression, as long as individualities are respected without prejudice to the common good and the progress of the company.

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. In addition, no employee shall be subjected to corporal punishment, physical, sexual, psychological or verbal, religious, political or organizational abuse or harassment, or any other coercive action.

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.

3. ACCOUNTABILITY REQUIREMENTS

3.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

C. Governance

More than a simple set of criteria, ESG is a journey of business transformation, involving the construction of an inclusive world that respects human rights, is integral, environmentally sustainable and guarantees quality of life and access to knowledge for all.

According to the Brazilian Institute of Corporate Governance, IBGC, Governance is the system by which companies and other organizations are managed, monitored and encouraged, involving relationships between partners, board of directors, management, supervisory and control bodies, and other interested parties. Aeris' Corporate Governance is based on the best market practices, taking as a reference the model recommended by the IBGC.

To achieve these results, companies need to have the ability to develop and implement business practices that align profit, purpose and transparency, that is, the business itself is sustainable, but without aiming for profit at any cost, which means that people matter and make all the difference in the construction of this new company model that has been demanded by the market, but which meets the pillars of Aeris in terms of values, objectives, and commitments made over the last decade.

Within this context, Corporate Governance plays a crucial role, because, in addition to providing security and transparency for shareholders, it defines the way in which the organization will exercise its purpose, determines and assigns the roles and responsibilities of the board of directors and the executive board, and considers engagement with stakeholders.

It is this system that guarantees the existence of adequate management processes and mechanisms for the main risks and opportunities related to the aspects that affect and are affected by the organization. It is also a strong promoter of ethical behavior and alignment of interests among stakeholders, enables strategic direction and planning, manages risks and opportunities, and determines the decision-making process.

We have an ESG agenda as part of the commitments made by Aeris, with a focus on sustainable development. In 2022, this agenda was recognized by the Company's inclusion in the B3 Corporate Sustainability Index (ISE), a portfolio formed by publicly traded companies considered a reference in good socio-environmental and governance practices.

Aeris develops its strategic planning by promoting integrated thinking, preventing topics from being evaluated in isolation, which is a constant concern for senior management, since sustainability needs to permeate the entire Aeris, in all its areas and through all employees.

4. REQUIREMENTS FOR PREVENTING AND COMBATING NON-CONFORMITIES



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4. REQUIREMENTS FOR PREVENTING AND COMBATING NON-CONFORMITIES

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

The employee may report such infractions to his/her immediate manager, the Legal and Compliance Department or the Aeris Reporting Channel.

In addition to our employees, our partners, customers, suppliers and society in general can also use the Aeris Whistleblower Channel to report cases of conduct and procedures that are contrary to the law, in non-compliance with this Code and other company rules.

A. Aeris Reporting Channel

Aeris has an outsourced Reporting Channel, as a way of guaranteeing the confidentiality and anonymity of the whistleblower, who may make their report through the website www.canaldedenuncia.com.br/aeris or by calling 0800-882-0611.

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

When registering a report, either via the website or by calling 0800, a six-digit protocol number will be provided, so that the complainant can follow the progress of the analysis of the complaint, if desired.

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



When reporting, Aeris guarantees maximum confidentiality and that no retaliation will occur as a result of your report. However, if the whistleblower wishes to identify himself, his identity will be kept confidential.

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

4. REQUIREMENTS FOR PREVENTING AND COMBATING NON-CONFORMITIES

B. Application of Disciplinary Measures

Aeris will take the necessary measures to effectively apply this Code of Conduct. No one, regardless of their hierarchical level or position, is authorized to request that a professional commit an illegal act or violate any of the clauses of this Code. Likewise, no professional may justify inappropriate, illegal conduct or conduct that contravenes this Code under the orders of a superior.

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



5. ACCEPTANCE OF THIS CODE



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5. 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 are part of or will be part of Aeris, who must accept its rules by printing and signing the last page and delivering it to their immediate manager. The manager, in turn, will deliver the signed term to the senior manager, and each Directorate will deliver the corresponding signed terms to the Legal and Compliance Management.

Employment and service provision contracts must include a clause with the express obligation to comply with the Code of Conduct.

This Code will be updated periodically, with the aim of always adhering to social behaviors. Through training, Aeris professionals will be trained and periodically updated on the content covered by this Code. In addition, the Integrity Committee will approve periodic internal communication actions.



6. REVIEW AND APPROVAL OF THIS CODE AND TRAININGS



INTEGRITY
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6. REVIEW AND APPROVAL OF THIS CODE AND TRAININGS

This Code will be reviewed annually, in order to remain up to date, based on situations that occur in Aeris' day-to-day activities, also taking into consideration the best market practices, the Annual Compliance System Report, as well as suggestions and proposals made by Aeris professionals to the Integrity Committee and the Legal and Compliance Management, who may formulate proposals for improving Aeris' Code of Conduct.

The Integrity Committee, with the support of the Legal and Compliance Management, 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 Integrity Committee and the Board of Directors.

This Code had its initial milestone on March 3, 2020.

7. GLOSSARY



INTEGRITY
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7. GLOSSARY

A

Abuse of power

it involves the practice of illicit or illegitimate acts deliberately or intentionally, which may involve public or private agents, and can occur both through action and omission, because both are capable of violating the law. It is also when the agent acts with excess power, exceeding the limits of his competence (excess of power), when he exercises his power for a purpose other than that intended (misappropriation of power), or when he fails to exercise it when he should act (illegitimate omission). The private gain, even though it is generally of an economic nature, can be of any nature, including the avoidance of an obligation; it can be passed on directly or indirectly to the beneficiary; and can be aimed at the agent who commits the abuse of power or at a third party.

Anti-Corruption Legislation

Penal Code (Decree-Law No. 2848/1940), Administrative Improbability Law (Law No. 8,429/1992), Money Laundering Law (Law No. 9,613/1998), Competition Defense Law (Law No. 12,529/2011), Differentiated Public Procurement Regime Law – RDC (Law No. 12,462/2011), Conflicts of Interest Law (Law No. 12,813/2013), Anti-Corruption Law (Law No. 12,846/2013) and other laws of a similar nature that are applicable.

B

Bribe

The practice of leading another person, whether a government agent, public servant or private sector professional, to commit an illegal act by paying money or offering other types of advantages, such as gifts and hospitality.

7. GLOSSARY

C

Conflict of interest

A conflict of interest is considered a situation generated by the direct or indirect confrontation between the personal interests of employees and those of Aeris, which may, in a concrete or apparent way, compromise or in some way influence, in an inappropriate manner, the performance of their duties, duties and responsibilities.

Corruption

It means offering, promising (active corruption), requesting or receiving (passive corruption) some undue advantage. It is the abuse of entrusted power for private gain. There is both public corruption (that involves a public agent) and private corruption (which does not involve public agents).

E

Employees

The term covers all advisors, directors, managers, employees, interns, apprentices, temporary workers, contractors, and other people who work at Aeris.

Equity

It is the sum of the assets that a person or institution rightfully owns. It can be material (tangible assets, such as real estate, automobiles, electronics, etc.) and immaterial (intangible assets, such as image, reputation, knowledge, practices, inventions and everything that depends on intellectual development).

7. GLOSSARY

F

Facilitated Payment or Facilitation Payment

It constitutes a form of bribery and is normally done with the intention of simply accelerating some administrative process (for example, issuing a license or permit) or competition in which the agent is participating. Payment is made, directly or indirectly, to a public agent or employee of public or parastatal entities, with the aim of completing some action or speeding up the process, for the benefit of oneself or third parties. Payments permitted by law are not included in this concept.

Fraud

Intentional act committed by one or more individuals, including managers, those responsible for governance, employees or third parties, involving the use of falsehood to obtain an unfair or illegal advantage. In other words, fraud is any intentional act or omission designed to deceive others, resulting in loss to the victim and/or direct or indirect gain to the perpetrator. Accounting fraud, in turn, refers to the intentional act of omission or manipulation of transactions, tampering with documents, records and financial statements. Any act carried out to obtain illicit gains to the detriment of another person, which includes falsifying documents, altering accounting data, among other practices.

G

Gifts

Any item of modest value, which has no commercial value or which is distributed by entities of any nature as a courtesy, advertising, regular publicity or on the occasion of special events or commemorative dates.

7. GLOSSARY

H

Hospitalities

For the purposes of this Code, hospitality is considered to be tickets for parties, shows, presentations, lunches, dinners, events, among other activities offered in order to strengthen relationships with third parties.

I

Information integrity

It consists of the reliability of information. It signals the compliance of stored data with regard to authorized insertions, changes and processing carried out. It also indicates the conformity of the data transmitted by the sender with that received by the recipient. Maintaining integrity presupposes the guarantee that data will not be breached with the intention of alteration, recording or deletion, whether accidental or on purpose.

Interactions or strategic meetings with public agents

These are those that involve decision-making related to the drafting of normative acts, the signing of contracts, partnerships, sponsorships, or agreements with the Public Authorities.

Integrity Committee

Collegiate body, responsible for dealing with and deliberating on topics related to the Integrity Program.

Integrity Program or System

Set of mechanisms, organizational structure, and internal procedures for integrity, auditing, and encouraging the reporting of irregularities and the effective application of codes of ethics and conduct, policies, and guidelines with the aim of detecting and remedying deviations, fraud, irregularities, and illicit acts committed against the public institution or administration, either national or foreign.

7. GLOSSARY

L

Logo

Visual or graphic representation that identifies a brand or company.

M

Middle Management

Managers, supervisors, area coordinators, and other middle management positions at an intermediate hierarchical level within Aeris.

Money laundering

Set of commercial or financial operations that seek to incorporate into the economy, temporarily or permanently, resources, goods or values of illicit origin through apparently lawful procedures. Simulation carried out through a commercial or financial operation where “dirty” money (of illicit origin) ends up having the appearance of “clean” money (of legal origin).

Moral harassment

Moral harassment in the workplace is considered to be the exposure of an employee, servant or employee to a humiliating or embarrassing situation, or any action, word or gesture, carried out in a repetitive and prolonged manner, during the working hours of the body or entity, and, by an agent, delegate, boss or hierarchical supervisor or any representative who, in the exercise of their functions, abusing the authority conferred on them, has the objective or effect of achieving the self-esteem and self-determination of the subordinate, with damage to the work environment work, services provided to the public and to the user themselves. It can take the form of verbal abuse, humiliating treatment, or threats.

7. GLOSSARY

P

Public agents

In addition to public servants, they are all those who exercise, even if temporarily or without remuneration, by election, appointment, designation, hiring or any other form of investiture or bond, mandate, position, employment or function in entities of direct or indirect administration or foundational of any of the Powers of the Federal Government, the States, the Federal District, the Municipalities, a company incorporated into public assets or an entity for the creation or funding of which the treasury has contributed or competes with more than 50% of the assets or annual revenue, under the terms of Law No. 8,429/92. A foreign public agent is considered to be anyone who, even temporarily or without remuneration, holds a position, employment or public function in bodies, state entities or in diplomatic representations of a foreign country, as well as in legal entities controlled, directly or indirectly, by the public power of foreign country or in international public organizations (art. 5, paragraph 3, of Law No. 12,846/2013).

S

Sexual harassment

Sexual harassment is defined as an unwanted advance of a sexual nature, request for sexual favors, exposure of inappropriate material or any other inappropriate verbal or physical conduct of a sexual nature in the workplace. Under art. 216-A of the Penal Code, it is considered sexual harassment to embarrass someone with the intention of obtaining sexual advantage or favor, with the offender taking precedence over his status as hierarchical superior or ancestry inherent to the exercise of employment, position, or function.

7. GLOSSARY

T

Third Parties

Any natural or legal person who is not an employee of Aeris, or who is hired to assist in the performance of its activities, such as partners, consortium members, representatives, suppliers, service providers in general, consultants, outsourced workers, agents acting on behalf of Aeris.

Top Management

People or group of people who direct and control Aeris and Aeris Service at the highest level, including members of the deliberative and executive bodies, such as the Board of Directors, Presidents, and Directors.

U

Unfair competition

Adoption of unfair competition practices, such as falsifying information or intimidating customers, suppliers or competitors, or corrupting their employees, with the aim of preventing the development of rival companies.

8. *TERM OF RECEIPT AND COMMITMENT*



INTEGRITY
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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 and Compliance Management or the Aeris Reporting Channel, 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.

Name: _____

Position: _____

Signature: _____

Registration Number: _____

Date and Place: _____, ____/____/____



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