

AERIS' CODE OF CONDUCT FOR THIRD PARTIES



INTEGRITY
PROGRAM



aeris

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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, acting responsibly to maintain and protect the environment, guaranteeing the rights of the community in our business environment, as well as society as a whole, and combating any and all types of corruption.

In this sense, Aeris' Code of Conduct for Third Parties plays an important role as a guide for the behavior and conduct of our business partners, namely: service providers, customers, external consultants, subcontractors, customs agents, partners, agents acting on behalf of the entity, and all those who are not employees but are hired to assist in the performance of Aeris' activities.

Our focus is on consistent and lasting results, without neglecting our third parties, who are fundamental to delivering our results and building a solid image with our clients.

Finally, we hope that you, Aeris third party, make a difference by complying with and multiplying among your teammates the content of this Code of Conduct for Aeris Third Parties, 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 daily life about how to behave or what attitude to take in any situation, do not hesitate to seek help by sending your question through the Aeris Reporting Channel, accessing the website www.canaldedenuncia.com.br/aeris or calling 0800-882-0611. Together, we will be able to build integral, sustainable and profitable businesses.

Aeris Third Party Code of Conduct represents much more than a list of rules: it is each person's personal commitment to act ethically and maintain a good business relationship, safeguarding Aeris' reputation as an honest company that respects human rights and the environment.

Alexandre Sarnes Negrão
President



1. SCOPE



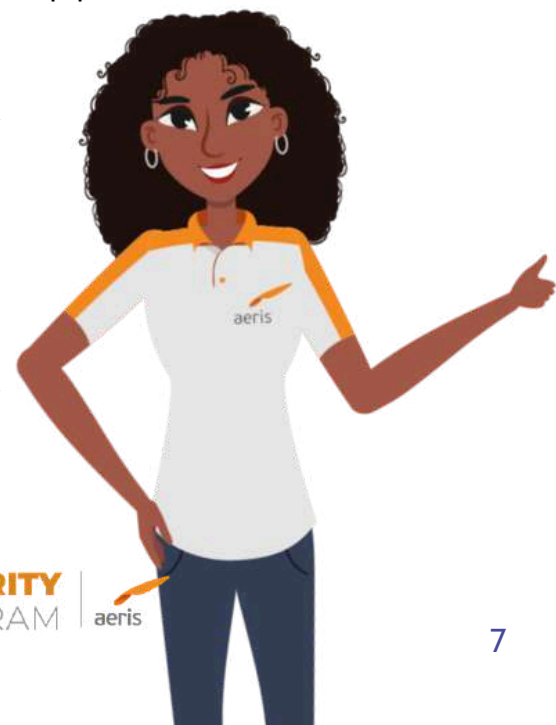
INTEGRITY
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1. SCOPE

- This Third-Party Code of Conduct is a guide of conduct and guidelines applicable to all Aeris and Aeris Services suppliers, customers, subcontractors and third parties, regardless of the country in which the third party's parent company, subsidiary(ies), controlled or affiliated companies are located.
- It is also aimed at organizations, public or private, that are interested in providing services or supplying materials to the company, making knowledge and compliance with the aspects set out in this document mandatory.
- It is the responsibility of Aeris' third parties to disclose the existence of this Code and its provisions and disseminate the rules contained therein to their own executives, partners, shareholders and members, ensuring that the ethical principles mentioned herein are effectively practiced throughout their organization.
- Acceptance of the Code is a prerequisite for all contracts entered into with Aeris. By accepting a Purchase Order, referring to the Code, the Third Party affirms its commitment that all its operations are subject to the provisions set forth herein.
- This Code does not grant the Supplier any type of third-party beneficiary rights. The rules of the Code are a supplement to and not a replacement for the provisions contained in any legal agreement or contract between suppliers and Aeris.
- Your acceptance will be made through the signing of the Term of Adhesion and Responsibility, which is included at the end of this Code, by one of your legal representatives, which must then be sent to the Aeris Supplies area, together with a copy of the document that proves legal representation.





2. ACCOUNTABILITY REQUIREMENTS



INTEGRITY
PROGRAM



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2. ACCOUNTABILITY REQUIREMENTS

2.1

RESPONSIBILITY FOR WHAT IS OURS

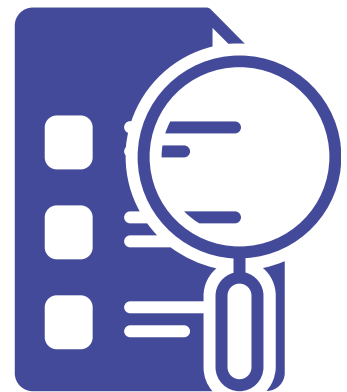
A. Use of AERIS assets.

If Aeris makes work tools available, including telephones, computers, software, internet network, copiers, email systems, among other equipment and devices, the use of such Aeris assets must be limited exclusively to the exercise of professional activities agreed between the parties in the contract, for the benefit of Aeris and never aiming to favor the third party or partner that uses them. Therefore, they must be subject to constant care and attention, to prevent them from suffering any damage, theft or loss.

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

Therefore, to prevent inappropriate behavior, Aeris may conduct searches on its third parties, as well as its employees (with due respect for the privacy, honor and image of employees), without prior notice, in order to prevent the diversion of tools, equipment and/or materials.

Under no circumstances may a third party or partner use Aeris assets to perform acts that constitute any type of violation of this Code of Conduct for Third Parties or even the Code of Conduct for Employees, nor of Aeris Policies.



2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

B. Confidential Information.

It is the duty of our third parties and partners to respect the protection and confidentiality rights of confidential information owned by Aeris and, including, other business partners with whom they may interact within the Aeris environment. Among them, we can consider any and all confidential information to which the third party may have access by virtue of its activities provided for in the contract.

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, pricing, sales, profits and markets;
- Information on development strategies;
- Equipment technical specifications; and
- Customer data and technical information.



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

In case of doubt as to whether or not they are dealing with confidential information, the third party must ask the Contract Manager or direct a query to the Legal and Compliance Management, through their Contract Manager. If you prefer, make your inquiry through the Aeris Reporting Channel, via the website www.canaldedenuncia.com.br/aeris or by telephone 0800-882-0611.

2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

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, if a third party has access to any of these items, they must protect it and use it appropriately, so that the use of this information is based on availability criteria and within the appropriate time frame, as provided for in the contract.

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 third parties 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 other purposes is prohibited. 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, even, through sharing of information made by Aeris itself in the media and on social networks.



2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

D. Intellectual Property Rights of Aeris and Third Parties

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

Just as our suppliers must take care of Aeris' confidential information, we must understand and respect the fact that information (about projects, products and/or services etc.) created by customers and other 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.

Therefore, as is the case with Aeris and its associates, our suppliers cannot use such information and documents without authorization from Aeris and its owner, much less commercialize them or have them as part of any type of commercial relationship, without being previously and formally authorized by them (by the issuers/creators) and by Aeris managers. Respect and Transparency are fundamental in our commercial relationships with our customers and business partners, and even between our partners.

When it involves 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 supplier's duty to communicate to the Contract Manager any and all intellectual production that is subject to registration and protection. In turn, the Contract Manager must contact the Legal and Compliance Department to take the necessary measures.

2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

E. Conflict of Interest

Aeris's third party is expected to always make decisions with the best interests of the Company in mind. In this sense, there is a conflict of interest when the personal interests of our third parties (representing the company they work for or for their own benefit) and partners conflict with the interests of Aeris.

Third parties 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 third party of Aeris;
- Attempting to interfere or influence the hiring of relatives in Aeris selection processes;
- If acting as a subcontractor, having any occupation similar to the activities performed at Aeris, which in any way affects its performance or which harms Aeris; and
- Entering into a contract with companies owned or managed by relatives or spouses who work at Aeris.

It is essential that, whenever there is doubt as to whether or not a situation represents a conflict of interest, the third party immediately reports the fact to the Manager of their contract or to the Legal and Compliance Management, through the Aeris Reporting Channel, so that the situation can be duly assessed and so that they can be advised on how to proceed.

2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

E.1 Political or Religious Activities

Aeris is a secular company, which is not part of any specific religion, giving freedom to its third parties 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, as well as candidates for elective office (president, governor, mayor, etc.) and political parties.

Therefore, we do not authorize any of our third parties to advertise or preach politically, philosophically or religiously when carrying out their professional activities on Aeris premises.

If you apply for any political office while working as a contracted worker at Aeris (outsourced), you must report this fact to 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 activities, or even to avoid any misinterpretation of a conflict of interest involving you, simply because you have run for elected office.

However, we prohibit our third parties from making any association of the Aeris name with any application, whether during or outside of working hours, regardless of the chosen means of dissemination, whether or not on Aeris premises.

Furthermore, you may not use workplaces, internal or external events organized by Aeris or its corporate communication channels to promote your own candidacy or that of third parties, as well as any political party or coalition, or to make statements of a political, ideological or religious nature.

Aeris supports the initiative of citizens to join political parties, as well as to run for elected office, as a full right to exercise citizenship. However, as a company that has shares on the B3 Stock Exchange, we cannot support any political party or candidate, as we need to ensure equal treatment among shareholders. As we have shareholders who support different political parties and different candidates, the best way to ensure equality is not to support any of them.

2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

F. Protection of Image and Reputation

We consider our third parties to be part of the Aeris team as well. Therefore, the conduct of our third parties 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 undue action by a third party or employee (regardless of the area of activity or hierarchical level, which includes the Contract Manager, Managers and the Board of Directors), it is the third party's duty to report such action, through



Aeris Reporting Channel

www.canaldedenuncia.com.br/aeris



or by calling **0800-882-0611**

- (24 hours a day, 7 days a week), thus protecting the Company's image and reputation, which is essential for the continuity of our business relationship.



2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

G. Money Laundering and Combating the Financing of Terrorism

Define-se como lavagem de dinheiro o processo de ocultar e/ou disfarçar a origem ilegal de recursos relacionados a atividades criminosas (suborno, corrupção, tráfico, contrabando etc.), associando-os a canais financeiros legítimos, na tentativa de legalizá-los, ou seja, deixá-los “limpos”. Daí a origem do termo “lavagem de dinheiro”.

Money laundering is defined as the process of hiding and/or disguising the illegal origin of resources related to criminal activities (bribery, corruption, trafficking, smuggling, etc.), associating them with legitimate financial channels, in an attempt to legalize them, that is, 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, or of promoting mass destruction. Its origin is generally due to reasons of xenophobia (prejudice against foreigners), discrimination or prejudice based on race, color, ethnicity, political opinion and religion, putting people, property, public peace or public safety at risk. It is very common for resources from money laundering to be used to finance terrorism.



For this reason, Aeris expects its third parties to be committed to combating money laundering and terrorist financing, committing to comply with all legislation related to combating these crimes. Any money laundering practices, concealment of income or the use of accounting practices other than those governed by legislation and accounting principles are unacceptable.

2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

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, a 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 then benefiting from that error.

Aeris repudiates any and all types of fraud, both by its employees (regardless of hierarchical level) and by its third parties. Therefore, all third parties, partners and associates 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 a third party, partner or associate to act improperly or illegally on behalf of the company is intolerable, and the financing, funding or sponsorship of any and all types of illegal acts is strictly prohibited.

2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

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 internal processes and 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, accurate and timely.

As transparency is one of our principles, no third party should hide or distort information in its accounting and tax records and financial reports, which must be complete, accurate and true. If you are found to have committed any type of infraction to the provisions herein, we would like to emphasize that this violates this Code of Conduct, so it is essential that we count on your help, reporting this behavior, if it occurs, so that we can investigate the case and resolve the issue definitively.



2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

J. Communication and Press Statements, Social Media and Public Presentations

Any and all types of communication intended for the press involving Aeris will be structured based on the guidelines of the Aeris Press Office/Communications area, which is specialized 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 third party or partner who is sought to give interviews, explanations or statements to the press on behalf of Aeris or about Aeris must direct the request to our 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.

Therefore, it is the third party's duty to contact Aeris' Communications department when contacted by the press, avoiding any type of undue disclosure of information or information not previously aligned 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 Legal and Compliance Management, through your Contract Manager, so that the contents and forms of the topics to be disclosed can be analyzed and alignment with the Board of Directors can be made, when necessary.

Always keep in mind that the following conduct is prohibited 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 in a way that disrespects Aeris' values;
- 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 conduct is found, the third-party company will be subject to disciplinary measures, such as requesting the employee to be dismissed from the team working under the current contract, which may lead to the termination of the supply and/or service provision contract.

2. ACCOUNTABILITY REQUIREMENTS

2.2

RESPECT FOR LEGISLATION AND BUSINESS INTEGRITY

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 WAY OF BEING SO AERIS.



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 third parties, as we do from our employees:

- 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.
- 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 third party is a guest of Aeris.

If a third party, representative, agent or attorney violates this rule, Aeris may request their replacement in terms of compliance with the contract, which may also result in the possible dissolution of the contract with the supplier company, which may be followed by legal proceedings, depending on the sphere of activity related to the respective conduct.

2. ACCOUNTABILITY REQUIREMENTS

2.3

RESPONSIBILITY IN AERIS'S RELATIONSHIP WITH ITS THIRD PARTIES

Aeris defends and strives to establish an honest relationship, based on legal and fair practices with its third parties and business partners. In this sense, any and all acquisitions of goods or services by Aeris must be made based on the Principles of Integrity and Impartiality, thus ensuring respect for this Code of Conduct and Aeris Policies, applicable to third parties and business partners.

We act responsibly and with respect for Human Rights, integrity and the environment in our relationships with our third parties and partners, and we understand and identify the treatment given by individuals or legal entities that act as our third parties 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 may also publicly and corporately recognize, prioritize or strengthen ties with those third parties and partners who respect the rules and act in accordance with the required and expected parameters.

In this sense, in our contracts with third parties, the Code of Conduct for Third Parties will always be included as one of the annexes to the contract, the acceptance of which, by the third party, 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 third parties to be aware of and comply with this Code of Conduct for Third Parties of Aeris, as well as other Aeris Policies that apply to them. The selection of a third-party company must also be associated with the analysis of its profile and adherence to Aeris Culture, based on completing the Integrity Due Diligence Questionnaire.

2. ACCOUNTABILITY REQUIREMENTS

2.3

RESPONSIBILITY IN AERIS'S RELATIONSHIP WITH ITS THIRD PARTIES

Therefore, all Aeris third parties undertake to:

1. Not to violate the rights of their workforce, customers and communities, and address the adverse human rights impacts of their activities.
2. Prevent their activities from causing, contributing to or being directly related to negative impacts on human rights and environmental and social damage.
3. Avoid impacts and harm to human rights arising from the activities of its subsidiaries and companies under their control or direct or indirect links.
4. Communicate internally that their associates are prohibited from adopting practices that violate human rights.
5. 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.
6. Ensure decent working conditions, through a productive environment, with adequate remuneration, in conditions of freedom, equity and security.
7. Not to use child labor or work similar to slavery; combat discrimination in labor relations.
8. Adopt measures to prevent and remedy any type of harassment in employment relationships.
9. Comply with applicable legislation; be up to date with their labor and financial obligations.
10. Combat work practices that violate human rights, regardless of the formats adopted or unfounded justifications that may be used by the third party or partner.
11. Prevent acts of corruption, avoiding situations in which resources are used to avoid compliance with legislation.
12. Prioritize the health and safety of its employees; combat the sexual exploitation of children and adolescents.
13. Guarantee the rights of traditional communities, such as indigenous, quilombola and riverside communities; guarantee the rights of migrant workers.
14. Guarantee Human Rights in all spheres and circumstances presented to them.

We understand that only with everyone's collaboration will we be able to act effectively in detecting and combating inappropriate relationships between Third Parties, Business Partners and employees. For this reason, we count on your collaboration in reporting to the Contract Manager or using the Aeris Reporting Channel (www.canaldedenuncia.com.br/aeris or 0800-882-0611, 24 hours a day, 7 days a week), any suspicious behavior and problems related to this topic.

2. ACCOUNTABILITY REQUIREMENTS

2.3

RESPONSIBILITY IN AERIS'S RELATIONSHIP WITH ITS THIRD PARTIES

A. Offering of Gifts, Presents and Hospitality

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), offered or 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, for example, diaries, calendars, keychains, pen drives, caps, t-shirts and pens, and cannot 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, for which the recipient does not have to pay the market value and which cannot be characterized as a gift.

The third party undertakes to follow the following rules regarding the offering of gifts, presents and hospitality:

- 1.If you are offering gifts, it must be through promotional objects that have the logo of the person offering the gift, without exclusivity, and that have a commercial value of up to BRL 200.00 (two hundred reais).
- 2.You may offer them, as long as there is no promise of favoritism, advantage, influence or benefit in any type of business to the person offering them.
- 3.It is prohibited to offer gifts in monetary amounts, regardless of the form of payment.
- 4.Under no circumstances may gifts or presents in the form of alcoholic beverages be offered. If this happens, the respective drink will be delivered to the Legal and Compliance Management, which will ensure the appropriate disposal. Therefore, we strongly recommend that this offer not be made.
- 5.In the event of offering gifts or presents worth more than this limit, the Legal and Compliance Management, which represents the company's Compliance, must be consulted by the third party, which may be done prior to the offer, through the Reporting Channel. Our recommendation is that, preferably, the value limit BRL 200.00 is not exceeded.

2. ACCOUNTABILITY REQUIREMENTS

2.3

RESPONSIBILITY IN AERIS'S RELATIONSHIP WITH ITS THIRD PARTIES

Hospitality

Are services or expenses for transportation, food, accommodation, courses, seminars, congresses, events, fairs or entertainment activities, granted by a private agent, such as a third party, to an Aeris employee, as a way of strengthening a commercial relationship.

As an example, we can mention the situation in which a third party 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, or even to deal with some improvement in the third party's production process, which may benefit Aeris.

Please pay attention to the following guidelines:

- In cases where invitations are offered to participate in events on behalf of Aeris, the third party must notify the Contract Manager by email, with a copy to the Director of the area involved. The Contract Manager, in turn, will take the case for analysis and opinion from the Legal and Compliance Management, forwarding the invitation for analysis and preparation of an opinion by this management regarding the guest's participation in the event, and this management may indicate another person, with a more suitable profile to represent the company at the event.
- Payments for travel, accommodation, daily allowances and meals are not permitted, except when related to the business or the employee's role. In these situations, the third party must notify the Contract Manager by email, with a copy to the Director of the area involved. The Contract Manager, in turn, will take the case for analysis and opinion from the Legal and Compliance Management, informing all the details related to the circumstance that gave rise to the offer (ticket, accommodation, etc.), so that the situation can be analyzed and an opinion can be prepared on the participation of the Aeris employee, and this management may indicate another person, with a more suitable profile to represent the company at the event.

If you still have any questions about this matter, you should forward them to the Legal and Compliance Department, via the website www.canaldedenuncia.com.br/aeris or via 0800-882-0611.

2. ACCOUNTABILITY REQUIREMENTS

2.3

RESPONSIBILITY IN AERIS'S RELATIONSHIP WITH ITS THIRD PARTIES

B. Fair Competition and Antitrust Laws

Aeris believes in and defends free competition and free enterprise. In this sense, it respects, encourages and promotes that all actions related to Aeris are always in accordance with what is determined by the legislation on the defense of competition and combating the abuse of economic power. To ensure effective compliance with applicable legislation, Aeris determines that third parties are prohibited from:

- Making agreements with competitors with the aim of setting prices, adjusting proposals, setting wages, demarcating markets or consumers;
- Providing, receiving or exchanging the following information with any competitor:
 - Prices;
 - Production, capacity, sales volume;
 - Costs;
 - Profits and margins;
 - Sales strategy;
 - Photos of the production area.



2. ACCOUNTABILITY REQUIREMENTS

2.3

RESPONSIBILITY IN AERIS'S RELATIONSHIP WITH ITS THIRD PARTIES

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, which must also be followed by our third parties, in addition to the following rules and 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 of 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, or at the administrative headquarters of Aeris, or the specific headquarters of the project or event, where applicable.

2. ACCOUNTABILITY REQUIREMENTS

2.3

RESPONSIBILITY IN AERIS'S RELATIONSHIP WITH ITS THIRD PARTIES

C.1 Collaboration with Possible Investigations and Inspections Carried out by Public Agencies, Entities or Agents

We value total respect for investigations and inspections carried out by public agencies, entities or agents, requiring our third parties, as we require our employees, to have transparent, respectful and fully cooperative conduct, should they eventually be called upon to provide clarifications or information to public agencies and agents.

In the event of an investigation, inspection or any other type of interaction carried out by a public agent, in which a third party is involved or called upon, they must collaborate with the public agents, providing the information requested.

In principle, we do not foresee situations in which a third party receives a delegation to interact with a public agent on behalf of Aeris. However, if this happens, for any reason, we advise you to contact your Contract Manager or the Legal and Compliance Department to receive the necessary guidance on the matter or to have an employee designated to replace you in this situation.

2. ACCOUNTABILITY REQUIREMENTS

2.3

RESPONSIBILITY IN AERIS'S RELATIONSHIP WITH ITS THIRD PARTIES

D. Combating Bribery and Corruption: Demanding and Accepting Benefits

D.2 Undue Payments and Donations to Public Authorities

It is prohibited for Aeris suppliers, or even potential suppliers, to use their role or position in the company in which they operate to offer any type of benefit of personal interest in their relationships with Aeris employees.

Any type of gift or payment, even in the form of courtesies, that may indicate any type of influence or consideration in the commercial relationships existing between Aeris and the partner is prohibited. Occasional courtesies of symbolic and unrepresentative value, described in item 2.3.B, do not fall within this prohibition.

When there are doubts about what can or cannot be offered, the ideal is to consult, prior to the offer, the Legal and Compliance Management, via the **website www.canaldedenuncia.com.br/aeris** or via **0800- 882-0611**.

E. Trade Unions and 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 associates.

Therefore, it is also the duty of third parties, as well as the duty of Aeris employees:

- 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.

2. ACCOUNTABILITY REQUIREMENTS

2.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA



Also known as ESG, this expression corresponds to Environmental, Social and Governance practices. The term was created in 2004, in a publication by the Global Compact in partnership with the World Bank, entitled “Those who care, win”. ESG criteria have been widely discussed over the last three years and their practices have been demanded by society, especially in relation to companies that are pioneers in their area of activity, such as Aeris, which has been working hard on these issues since 2010.

ESG criteria are fully related to the 17 Sustainable Development Goals (SDGs), which we will discuss later. As a company that cares about these issues, we outline below how we act on each of these pillars and we count on the work of our employees so that these issues continue to be part of our daily lives, under the care of each employee and third parties at Aeris.

Therefore, in order to have a lasting business relationship, we strongly recommend that our third parties commit to the best market practices in terms of ESG. This way, we will always be aligned, focusing on creating sustainable businesses.

2. ACCOUNTABILITY REQUIREMENTS

2.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

2.4.1. Commitment to the planet and our shareholders

Aeris is building a world powered by clean energy. In this sense, concern with ESG criteria is part of our daily lives.

We rely on our third parties and business partners to comply with the factors below together with us (whenever applicable), as they are crucial for the good of society, the maintenance of the planet and the construction of a better world, directly affecting the Company's financial and operational results.

- Environmental factors: use of natural resources, greenhouse gas emissions (CO₂, methane gas), energy efficiency, pollution, waste and effluent management.
- Social factors: employment policies and relations, inclusion and diversity, employee engagement, workforce training, human rights, community relations, privacy and data protection.
- Governance factors: independence of the board, senior management remuneration policy, diversity in the composition of the board of directors, structure of the audit and fiscal committees, ethics and transparency.



2. ACCOUNTABILITY REQUIREMENTS

2.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

A. Environmental

A.1. Sustainability

Aeris, by its essence, is a company that believes that sustainability is the fundamental requirement for economic progress and the success of its activities, complying with the standards established in the 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 balance of the planet's climate. Sustainability is part of the essence of the Company, which has been a signatory, since 2018, to the United Nations (UN) Global Compact. Adherence to the Pact also demonstrates Aeris' commitment to contributing to the 2030 Agenda, proposed by the UN in 2015 and composed 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, towards which it has directed greater efforts, as follows:**



Therefore, 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, and even the carrying out of a public consultation with the surrounding community in relation to such measures or actions.

2. ACCOUNTABILITY REQUIREMENTS

2.4

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 for the environment, and ensures compliance with environmental legislation wherever it operates. For this reason, Aeris adopts practices to reduce pollution and waste, promote energy and water savings, and conserve natural resources, 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 for 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 environmental dates, such as Environment Day, Water Day, Earth Day, among others. Being honest also means committing to and taking actions to maintain, protect and respect the environment, in line with best market practices, and applicable penalties may be applied if this commitment is not honored.

We encourage this in our third parties, as we understand that this way we are building a better future for the next generations.

2. ACCOUNTABILITY REQUIREMENTS

2.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

B. Society

B.1 Protagonism in the community

Aeris develops and encourages its third parties to also develop their exercise of 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.

Aeris is always committed to collaborating with the community in the most diverse sectors: health, education, sports, leisure and culture. Therefore, it maintains in its calendar the development of constant social programs and actions with the community. Furthermore, it maintains dialogue and initiatives that ensure the safety of the territory and the populations directly and indirectly affected by the company's business. In view of our commitment to the surrounding community, it is necessary that our third parties also watch over, care for and do not do anything against the surrounding community.



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 third parties of any nature, basing our activities on the best market practices, with regard to respect for human rights, diversity and social inclusion, combating prejudices in terms of gender, color/race, ethnicity and age group, among others.

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

If our third parties or business partners identify the use of labor that disrespects human rights, such as those mentioned above, Aeris will terminate the contract in question and report the breach, whatever the format, to the competent authorities, so that the penalties provided for by law can be adopted. Aeris reinforces its commitment to fundamental human rights recognized in national and international legislation, respecting and safeguarding them in all its activities.



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

2. ACCOUNTABILITY REQUIREMENTS

2.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

C. Governance and ESG

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

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.

2. ACCOUNTABILITY REQUIREMENTS

2.4

RESPONSIBILITY WITH ESG

(Environmental, Social and Governance) CRITERIA

C. Governance and ESG

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.

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. This is a constant concern for senior management, since sustainability needs to permeate the entire Aeris, in all its areas and through all employees.



It is important to highlight that, just as Aeris is concerned with governance and ESG, it is necessary for our third parties to do the same, creating mechanisms that help the company align profit, purpose and transparency. We understand that ethics and transparency are fundamental for those who do business with us, and furthermore, the transformation of businesses from their traditional format into sustainable businesses is fundamental for the longevity of our commercial relationships.

2. ACCOUNTABILITY REQUIREMENTS

2.5

RESPONSIBILITY FOR LABOR RELATIONS

We value ethics and transparency in our relationships and in dealing with problems. Therefore, here at Aeris, we are concerned with ensuring that the work carried out, both by our third parties and by our employees, is within the legislation and allows for the best possible working conditions, so that activities are carried out in a way that provides the best results for society and for our shareholders.

A. Compliance with Labor Legislation

Third parties must ensure that the work carried out by their employees complies with current laws, paying attention to the specific legislation in their sector of activity, particularly regarding working hours (number of hours and days worked, rest periods, overtime, compensation, vacations and others) and remuneration. Employees of Aeris third parties must receive wages and benefits in accordance with applicable laws in force and in compliance with collective agreements.

B. Forced Labor

Under no circumstances shall Aeris third party use or otherwise benefit from forced or compulsory labor. Likewise, the use of slave labor is expressly prohibited, as is the use of physical punishment, confinement, threats of violence or other forms of harassment or abuse as a method of discipline or control.

C. Bias, Discrimination and Harassment

Third parties must adopt practices in accordance with current legislation that prohibits discrimination in work conduct in relation to race, color, religious belief, sex, age, sexual orientation, gender, philosophy of life, political ideology, physical and/or mental disability or limitation, way of dressing, speaking, physical appearance, financial condition, education and all forms of expression, provided that individualities are respected without prejudice to the common good and the progress of the company. They must encourage practices that eliminate any type of discrimination, and employees must be treated with respect and dignity. 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.

2. ACCOUNTABILITY REQUIREMENTS

2.5

RESPONSIBILITY FOR LABOR RELATIONS

D. Child Labor

The use of child labor by the third party is absolutely prohibited. The third party must also prohibit its suppliers from using child labor, and Aeris may, if it identifies such conduct on the part of our third parties, terminate the supply or service provision contract, even if the use of child labor was made by another client and not by Aeris. Maintaining a contract with a third party that carries out such a practice is equivalent to being complicit in this practice, a fact that violates our values and what we believe in, given that the culture of integrity is part of our daily lives and is present in everything we do.

E. Combating the Sexual Exploitation of Children and Adolescents

We are concerned not only with the work environment, on Aeris' premises, but also with the surrounding area, which is used by our third parties and the community itself. In this sense, combating the sexual exploitation of children and adolescents is a topic addressed in our training and reinforced in this Code of Conduct, so that the sexual exploitation of children and adolescents is strictly prohibited on Aeris premises.

With respect for human rights as one of our foundations, we understand that the sexual exploitation of children and adolescents is unacceptable and abominable. In this sense, if we identify any of our third parties committing such a practice on our premises or in their surroundings, the contract with Aeris will be terminated and the police authorities will be called to combat such fact.

Therefore, when faced with this type of situation, any employee, third party or employee of an outsourced security company that provides us with services must report such situation to the competent authorities (by dialing 190) and report it through our **Reporting Channel, making the report through the website www.canaldedenuncia.com.br/aeris or by dialing 0800-882-0611**, attaching, whenever possible, some evidence (such as a photo or video) of the circumstance being reported, guaranteeing the anonymity of the complainant and the confidentiality of the report, which will be reported only to the competent authorities.

2. ACCOUNTABILITY REQUIREMENTS

2.5

RESPONSIBILITY FOR LABOR RELATIONS

F. Combating Harassment, Whatever Form It Takes

We understand that a healthy work environment is one free from harassment and, therefore, the third party must take an active role in combating any type of conduct that may be offensive or that may in any way make people feel harassed: derogatory nicknames, intimidation, unwanted physical contact, inappropriate gestures, slander, defamation, insults, aggressive acts and derogatory jokes. This list also includes moral harassment and sexual harassment, which are inadmissible and unacceptable to Aeris. Such conduct is strictly prohibited in the Aeris workplace.

G. Guarantee of the Rights of Communities Surrounding Aeris

Regarding the concern for our surroundings, our Social Intelligence area carries out work involving the traditional community in the surrounding area, guaranteeing their rights, so that Aeris contributes more and more with its activities. Therefore, similar conduct by our third parties will be highly appreciated, and they may even contact our Social Intelligence area, with the aim of carrying out social projects in partnership that will help in the subsistence and strengthening of the surrounding community.

In order to guarantee human rights, we also guide our outsourced private security personnel on the importance of respecting human rights, and that, as such, they must be very cautious when using force, in order to avoid fighting violence with more violence or causing any type of damage, which is something prohibited by Aeris.

2. ACCOUNTABILITY REQUIREMENTS

2.5

RESPONSIBILITY FOR LABOR RELATIONS

Building Relationships with the Local Community

At Aeris, we adopt practices to build a relationship with the local community, aiming at development through the area of Social Intelligence. Among these practices, we can mention:

- Identification and assessment of the impacts generated in the community, resulting from the company's activities, as well as the risks of violation of Human Rights.
- Promotion and provision of appropriate means of engagement and channels of dialogue.
- Carrying out prior, free and informed consultation with traditional communities, when applicable.

In this sense, we inform our third parties and partners that, if they identify with our way of acting in society, they should do the same with the community around them. We are convinced that companies are a crucial factor in the maintenance and development of these communities. We are available to discuss this topic and find, together, viable solutions that have communities as their goal.

We emphasize that our third parties are prohibited from causing any type of damage or inappropriate use of force against the community around us. Should this occur, Aeris will terminate the contract in question and report the situation, whatever the format, to the competent police and judicial authorities, so that the penalties provided for by law may be applied.

2. ACCOUNTABILITY REQUIREMENTS

2.6

RESPONSIBILITY FOR HEALTH, SAFETY AND THE WORK ENVIRONMENT



Aeris' third parties and business partners must comply with current national legislation and international standards on Occupational Health and Safety, as well as Aeris' Safety Policy and the specific certifications required (where applicable). It is necessary to observe the precautionary principle in activities, promoting responsibility and awareness among all those involved.

They must also identify, monitor and record the risks associated with their specific work activities and functions, establishing measures for prevention, reduction and continuous improvement.

In addition, third parties and business partners of Aeris must train their workers and provide them with the means and equipment for their individual protection, ensuring adequate working conditions, and define 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 on Aeris or Aeris Service facilities.



3. COMMITMENT TO QUALITY



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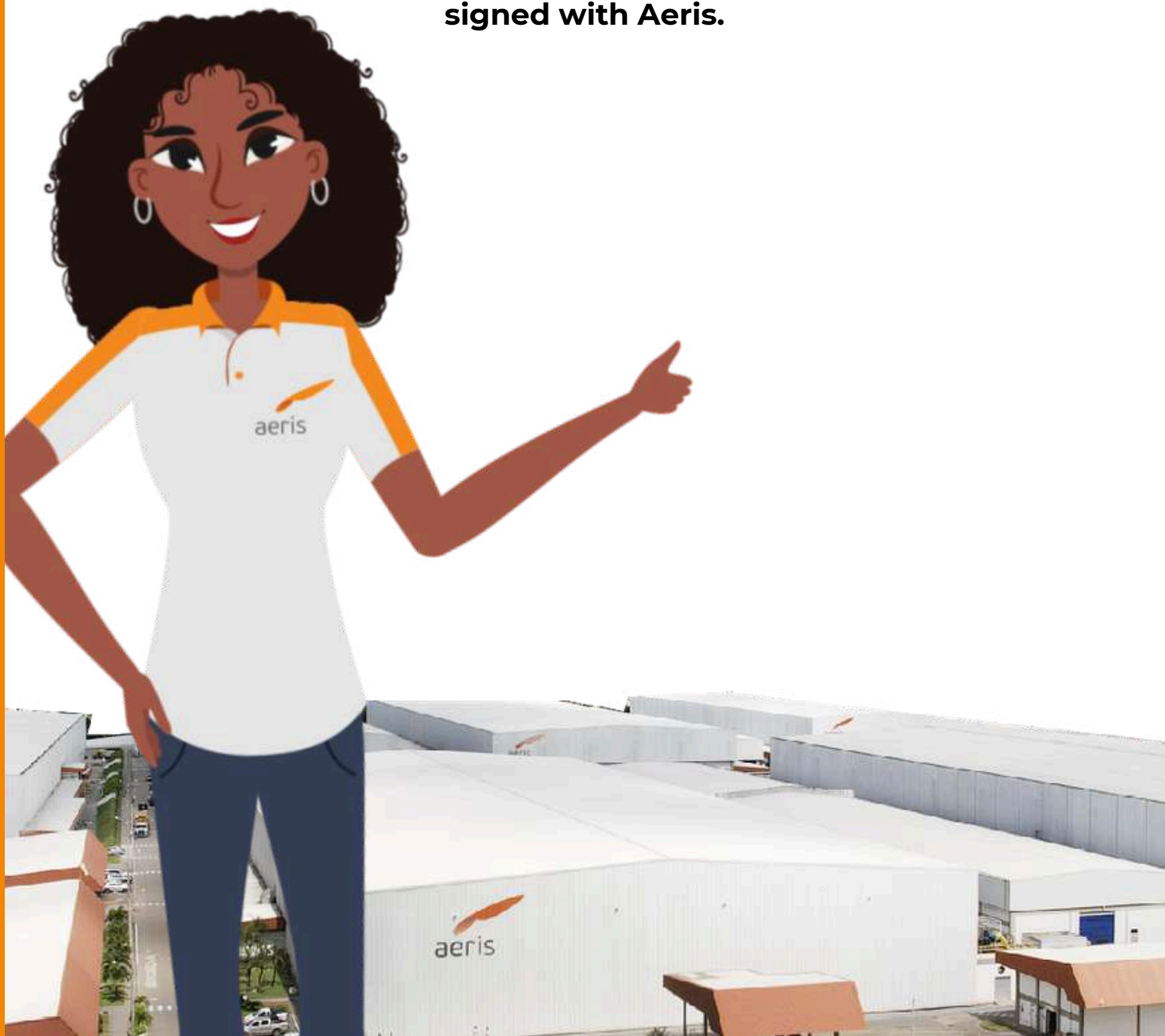


3.COMMITMENT TO QUALITY



Aeris is committed to quality and values the performance of third parties who focus on continuous process improvement. Additionally, it also values the focus on discipline, quality control of its deliveries, innovation and technical contribution to Aeris operations.

We encourage our third parties to adopt practices that are aligned with our quality-focused value, such as 6-Sigma and Lean Manufacturing, in their daily actions, especially in contracts signed with Aeris.





4. ANTI-CORRUPTION AND ANTI-BRIBERY ACT



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4. ANTI-CORRUPTION AND ANTI-BRIBERY ACT

Aeris has integrity as its foundation and, therefore, respects the rights of individuals, the environment and society. In this sense, one of their concerns is the fight against corruption. To this end, it relies on its Anti-Corruption and Public Administration Relations Policy, which is also applicable to its third parties and business partners.

Our third parties and business partners must not carry out, continue, permit, consent to or be complicit in any activity, practice or conduct that could constitute or appear to constitute an act of bribery and/or corruption, which is criminally punishable under applicable law. It is necessary to establish procedures and implement the necessary and appropriate measures in order to prevent these acts from occurring.

We guide our third parties and business partners to adopt instruments and mechanisms that prevent money laundering, fraud, corruption and other illegal actions, ensuring compliance with current legislation. They must also not influence public or private agents, directly or indirectly, by paying or receiving bribes, compensation or any other means that is unethical or that puts their reputation, honesty and integrity at risk, as well as that of the public with whom they interact, including Aeris.

Third parties and business partners must not engage in or tolerate illicit practices such as bribery, extortion, corruption and kickbacks in all their forms. Its employees, directly or indirectly, must not offer or receive any advantage or object of value with the intention of influencing any act, decision or business.

In addition to the Anti-Corruption and Public Administration Relations Policy, our third parties must observe and comply with applicable national and international anti-corruption and anti-bribery legislation, where applicable. It is everyone's responsibility, including third parties, to immediately report to Aeris any suspicions or cases of actions of this nature that they may be aware of. This communication can be made through the Aeris Reporting Channel, as detailed in the next topic.



5. PREVENTION AND COMBAT OF NON-CONFORMITIES



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PROGRAM



5. PREVENTION AND COMBAT OF NON-CONFORMITIES

It is the duty of every third party, as well as employees, to combat and report any actions that indicate possible violations of the laws, Aeris Policies and this Code of Conduct. The third party may report such violations to the Manager of their Contract or, if preferred, to the Legal and Compliance Management, through the Aeris Reporting Channel. In addition to our employees, our partners, customers, third parties and society in general can also use the Aeris Reporting 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

Whenever our third parties and business partners notice any conduct (regardless of whether the person carrying it out is another third party or an Aeris employee, for any and all areas of activity or positions held, which includes, by way of example, the Contract Manager, Managers and Directors) that disrespects this Code of Conduct for Third Parties, or any of Aeris' Policies, or even situations not provided for in this Code but that violate the culture of integrity, which is so essential to Aeris, they must report the fact or situation in question through the Aeris Reporting Channel, which operates 24 hours a day, 7 days a week, regardless of the suspicious attitudes and problems related to this topic.

The Aeris Reporting Channel is outsourced, as a way of guaranteeing confidentiality and anonymity to the whistleblower, who may make their report through the website www.canaldedenuncia.com.br/aeris or through 0800-882-0611. If the registration is done via the website, it is possible to attach audio, video, photo files and even other types of documents, in the extensions DOCX, XLS, CSV, PDF, PNG, JPG, MP4, WAV, PPT, TXT, up to 1 GB in size. 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, with the protocol number it is also possible to access the system and include evidence, such as image, audio, video files, etc. When reporting, Aeris guarantees maximum confidentiality and that no retaliation will occur as a result of your report. However, if the whistleblower wishes to identify himself, their identity will still be kept confidential.

5. PREVENTION AND COMBAT OF NON-CONFORMITIES

B. Application of Legal and Contractual 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 (whether a third party or collaborator) 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 hierarchical superior.

The application of legal and contractual 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 Legal and Compliance Management, with support from the Procurement area, in compliance with the contractual clauses and applicable and current legislation, as well as the contractual sanctions provided for.

Aeris has a principle of zero tolerance for unethical conduct and informs that any third parties who commit violations of the law, Aeris Policies applicable to third parties and this Code of Conduct will be subject to the applicable legal and contractual measures, including the request for their replacement regarding compliance with the Contract with Aeris, up to the possible dissolution of the contract with the third party company, which may be followed by legal proceedings, depending on the sphere of action related to the respective conduct.



6. COMPLEMENTARY PROVISIONS



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6. COMPLEMENTARY PROVISIONS



No third party may claim ignorance of the guidelines contained in this Code, under any circumstances.

Aeris reserves the right, at any time, to verify whether Third Parties are complying with the provisions of this Code.

Failure to comply with the principles and commitments expressed in this Code may imply the adoption of legal and contractual measures, from blocking third parties for new contracts to the termination of current contracts, in accordance with Aeris rules, without any prejudice to your rights, whether contractual or legal.

Full compliance with this Code is a fundamental condition for the company to remain in Aeris' third-party database. All normative documents cited in this Code will be available at **<http://www.aerisenergy.com.br/pt-br/negocios-suppliers>**.



7. REVIEW AND APPROVAL OF THIS CODE AND TRAININGS



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7. REVIEW AND APPROVAL OF THIS CODE AND TRAININGS

This Code will be reviewed annually, so as 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 and our third parties to the Integrity Committee and the Legal and Compliance Management, who may formulate proposals for improving Aeris' Third-Party Code of Conduct.

The Integrity Committee, with the support of the Legal and Compliance Management and the Board of Directors, is responsible for the effective application of the provisions of this Aeris Third Party Code of Conduct.

Any changes to this Aeris Third Party Code of Conduct must be approved by the Integrity Committee and the Board of Directors.

This Code was marked by the version approved on March 3, 2020.



8. ***GLOSSARY***



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8. 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.

8. 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).

8. 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.

8. 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.

8. 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.

8. 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.

8. 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.

9. TERM OF RECEIPT AND COMMITMENT



INTEGRITY
PROGRAM



aeris

TERM OF RECEIPT AND COMMITMENT

TERM OF COMMITMENT AND ACCEPTANCE OF THE CODE, INTEGRITY AND HUMAN RIGHTS COMMITMENTS

We, the undersigned, hereby confirm that:

- We have received and become aware of the content of the Aeris Third Party Code of Conduct;
- We are aware of all relevant legislation and regulations in the countries where our company operates;
- We are ready to report any suspected violation of this Code of Conduct, through the Aeris Reporting Channel;
- We will comply with the requirements in the Aeris Third Party Code of Conduct based on a development-oriented approach and without additions or deletions;
- The company/organization now qualified does not practice or allow anyone to practice, within its sphere of activity, acts that violate the laws, norms, rules and regulations in force in the Brazilian legal system, which constitute a violation of human rights.
- I am duly aware of the ethical, socio-environmental and Human Rights guidelines established in this Code.
- We will inform all our employees/subcontractors of the content of the Aeris Third Party Code of Conduct and will take steps to ensure that they also comply with the provisions therein.

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.

Company's Name: _____

CNPJ (National Register of Legal Entities): _____

Name: _____

Position: _____

Signature: _____

Date and Place: _____, __/__/__



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