

REVIEW AND APPROVAL

This Policy was approved at ENEVA’s Board of Director’s meeting, held on 09/22/2020, and any amendment or review shall be submitted to ENEVA.

Review	Date	Description of updates
0	06/01/2020	Creation of the document.

Creation	Review	Approval
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1. PURPOSE

The purpose of the Anticorruption Policy of ENEVA S.A. and its subsidiaries (jointly referred to as "ENEVA" or "Company") is to establish minimum standards of behavior for their Employees, as well as for their Third Parties in situations that may involve or characterize Corruption or Money Laundering, explicitly conveying the Company's stance of rejecting any and all situations or circumstances related to such practices.

This Policy also aims to cause the Employees to comply with the requirements of the Anticorruption Legislations, set forth in the Anticorruption Law (Law No. 12,846, August 1, 2013), in order to ensure that the highest standards of integrity, legality and transparency are adopted when conducting business.

The provisions of this Policy complement the conduct guidelines set out in ENEVA's Code of Conduct, as well as the published guidelines and internal procedures.

2. APPLICATION

This document applies to all areas that compose ENEVA's organizational structure and joint ventures in which the control is exercised by ENEVA.

3. DEFINITIONS

Public Agent – Brazilian or foreign public agents, including any public officials, political agent, civil servant or public employee belonging to the direct and indirect Public Administration of any Branches of the Federal Government, the States, the Federal District, the Municipalities, the Territory, a company incorporated to the public property or an entity the creation or funding of which is or was supported by the public treasure with more than fifty percent of the assets and annual revenues, even when occupying a position or duty in a provisional manner and without compensation. To that end, Public Agent also means a candidate for any political term of office.

Examples: mayors, governors, presidents, secretaries, ministers, city councilors, representatives, technicians from regulatory agencies, such as the National Electric Energy Agency (ANEEL), Ministry of the Environment, National Council for the Environment (CONAMA), Brazilian Institute of Environment and Natural Resources (IBAMA), Municipal Secretariat for the Environment, customs' officials, tax officials, employees of companies controlled by the Public Administration, such as the Post Office, Federal Savings Bank, BNDES, Petrobras, among others.

Employee - all ENEVA employees, regardless of hierarchical level, including directors and officers. This also encompasses service providers that are allocated to ENEVA's facilities.

Corruption - act or effect of offering, promising to give, directly or indirectly, an Improper Advantage to a Public Agent, or a third party related thereto.

Anticorruption Due Diligence - evaluation of Suppliers, Third Parties, clients and potential partners in new businesses by checking public information or other background information, in order to assess the risk of Corruption and Bribery, including in the case of donations and sponsorship.

Bribery - promise, payment, granting, among others things, of something of value that can give rise to a commercial benefit or advantage, done with the intention of improperly influencing a

Government Official or any other person with the purpose of obtaining or maintaining any advantage.

Money Laundering - act of hiding or concealing the nature, origin, location, availability, transactions or ownership of goods, rights or amounts arising, directly or indirectly, from a criminal offense, such as, for example, Corruption acts.

Anticorruption Legislation - all laws related to preventing and sanctioning anticorruption practices, including, but not limited to, Decree-Law No. 2,848, of December 7, 1940; Law No. 8,429, of June 2, 1992; Law No. 9,613, of March 3, 1998; Law No. 12,846, of August 1, 2013; Decree No. 5,687, of January 31, 2006, which promulgated the United Nations Convention against Corruption, adopted by the United Nations General Assembly on October 31, 2003, Decree No. 8,420, of March 18, 2015, ordinances and normative rulings issued by the Office of the Federal Controller General under the terms of the aforementioned law and decree, as well as all laws, decrees, regulations and other normative acts issued by a governmental authority with applicable jurisdiction, related to this matter.

Third parties - includes all representatives, service providers, outsourced workers, any other individuals or legal entities and other business partners of ENEVA.

Influence Peddling - the act of requesting, demanding, charging or obtaining, for oneself or others, an Improper Advantage or promise of Improper Advantage, under the pretext of influencing an act performed by a Public Agent (article 332 of the Criminal Code).

Improper Advantage - benefit, right, thing of value or any other material asset given to a Public Agent for Corruption purposes. For purposes of this Policy, as the applicable legislation does not set out a final definition of Improper Advantage, by way of example, the following can be deemed an Improper Advantage to Public Agents: (i) presents on commemorative dates, (ii) offering jobs to relatives or (iii) concert tickets.

4. PRINCIPLES

The main principle of the Anticorruption Policy is to conduct ENEVA's operations and business in an ethical manner and with absolute integrity.

The Policy requires compliance with ENEVA's Code of Conduct and the Anticorruption Legislation applicable to all of its Employees and Third Parties. ENEVA does not tolerate any form of Corruption of Public Agents, Money Laundering or the offer of any other type of improper advantage to individuals to obtain or retain business.

The Anticorruption Policy shows the commitment of the Company and its management bodies to fight Corruption in all its forms, as well as its adherence to the "zero tolerance principle" in the event of any unlawful or an unethical act, even if lawful.

4.1 Fighting Corruption

- When hiring Third parties, Employees must follow the Guideline for Relationship with Third parties.
- All agreements executed with Third parties shall mandatorily set out anticorruption clauses to ensure compliance with this Policy and may have specific clauses for the monitoring thereof, if necessary.
- Corporate transactions, such as joint ventures and mergers and acquisitions, are transactions that may pose important liability risks for ENEVA, since the Anticorruption Legislation provides for succession in some cases. Therefore, Employees involved in corporate transaction negotiations in general must seek to ensure that the target companies operate within the same ethical standards as ENEVA, before the deal is completed.
- The preparation of ENEVA's financial statements complies with the laws, rules and regulations in force and the recommendations of the Board of Directors, Statutory Audit Committee, Executive Board and External Audit. They must always truly reflect the transactions carried out by the company, with a reasonable level of detail and transparency.
- Carry out the Anticorruption Due Diligence when hiring a Supplier, Third Party and making donations/ sponsorships, according to internal guidelines, and the Compliance area is responsible for establishing the criteria.
- ENEVA shall have and its Employees shall guarantee a system of internal controls that offers reasonable guarantees that the transactions are carried out with the proper authorization, documentation, accuracy and transparency.

5. GENERAL PROVISIONS

5.1. Prohibited Conducts

ENEVA's Employees and Third Parties are expressly prohibited from performing the following actions that may represent significant penalties to ENEVA, as well as civil, administrative and criminal liability to the Employee or Third party involved in such conduct:

- Abuse his/her position within ENEVA to obtain any kind of advantage, for himself/herself or for any related person, whether directly or indirectly.
- Demand or request an advantage that may be deemed undue, including in cash, in exchange for carrying out any tasks, such as obtaining information, approving projects, or failing to perform an official obligation (e.g., exercise of inspection and application of penalties for contractual non-compliance).
- Promise, offer or give to a Public Agent, himself/herself, or through an agent, whether an individual or legal entity, any money or any other advantage that may be deemed an Improper Advantage (for example, travel, accommodation, tickets and presents), even if this does not represent business or benefits to ENEVA.
- Promise, offer or give to an individual, himself/herself or through an agent, whether an individual or legal entity, any money or any other advantage that may be deemed an improper

advantage (for example, travel, accommodation, tickets and presents), even if this does not represent business or benefits to ENEVA.

- Receive or request himself/herself, or through an agent, whether an individual or legal entity, any money or any other advantage that may be deemed an improper advantage (for example, travel, accommodation, tickets and presents), even if this does not represent business or benefits to such Third party.
- Make any payment, known as emergency fee, himself/herself or through Third parties, through which a government action, service or act can be unduly expedited or which aims to ensure the performance of an action or service in relation to its normal conditions of performance or compliance, especially if the action or omission may characterize undue favoritism.
- Finance, fund, sponsor or otherwise subsidize, himself/herself, or through Third parties, the performance of illegal acts set forth in this Policy, in ENEVA's Code of Conduct or in the Anticorruption Legislation.
- Use the agent, whether an individual or legal entity, to conceal or disguise their real interests or the identity of those who will benefit from the actions performed;
- Manipulate or defraud, directly or through Third parties, the selection and hiring process of suppliers and service providers, either with the Public Administration or between private parties.
- Hamper the investigation or inspection by bodies, entities or Public Agents, or otherwise influence these activities, inclusive in the context of regulatory agencies and oversight bodies under the Brazilian financial system.
- conceal or disguise, himself/herself or through Third parties, the nature, origin, location, availability, transactions or ownership of goods, rights or amounts arising, directly or indirectly, from a criminal offense.
- Practice any cunning, deceptive act, to the detriment of others, obtaining for oneself or others any illegal advantages or benefits (whether monetary or not), and
- Grant, himself/herself or through a Third party, an advantage or promise of Improper Advantage (in this case it does not involve money) to a Public Agent in order to influence an action performed by those people in the exercise of their duties.

5.2. Expected Conduct

- All Employees and, when necessary, Third parties must take part in trainings related to the Anticorruption Legislation and the Integrity Program made available by the Company.
- All Employees must declare potential conflicts of interest to the Compliance area, through the compliance system.
- All Employees and Third parties must immediately report to the Compliance area through ENEVA's Whistleblower Channel, any suspicious or potential situation of violation of the rules or this Policy or the Code of Conduct.

- Employees and Third parties must not offer, promise, give, transfer or authorize any type of Bribe.
- All Employees and Third parties must follow and comply with ENEVA's Code of Conduct, the Integrity Program and any applicable laws or regulations related to Corruption or Bribery, including the Anticorruption Legislation.
- All Third parties must accept and comply with the terms described in the Code of Conduct for Third parties made available in the supplier registration system.
- Employees or Third parties must not make emergency fee payments on behalf of ENEVA, and
- All Employees and Third Parties must be alert and report any suspected Corruption or violation of the Code of Conduct, Integrity Program and this Policy.

5.3. Eneva's Whistleblower Channel

All Employees and Third parties must freely express their concerns and immediately inform any behavior or situation that may conflict with the Code of Conduct, this Policy or which may violate any other policies of ENEVA, the applicable laws or regulations.

Employees are encouraged to inform their supervisors, the Compliance area, and/or use ENEVA's Whistleblower Channel, in case they become aware of a potential or actual violation. Employees and Third parties may report violations as follow:

Through the website: www.contatoseguro.com.br

By the phone: 0800 601 8679

If the Employee or Third party prefers not to identify themselves, ENEVA shall ensure anonymity. In all cases, the name of the person who made the report will be kept confidential. All reports recorded in the channel are informed to the reporting person with respect to its progress. More information and specific guidelines may be obtained with the Compliance area or in specific rules.

We guarantee that all reports will be analyzed and responded to in an appropriate manner. No retaliation or discrimination will be imposed on an Employee as a result of a report of violation of this Policy. This also applies if the report is unfounded, as long as the information is provided in good faith.

Acts of fraud, impropriety and corruption will be reported to the competent authorities in the same way and as any other type of crime.

5.4. Disciplinary Measures

Failure to comply with the conduct defined in this Policy and/or the applicable laws and regulations may result in the application of disciplinary measures to the respective employees. Disciplinary measures will be compatible with the type and severity of the violation, and they may vary from warning to dismissal, for cause, without prejudice to administrative, civil and criminal sanctions, if applicable, pursuant to the respective legislation. It Is worth mentioning that Third parties hired by ENEVA involved in violations to this Policy or the applicable laws and regulations shall be subject

to the measures set forth in the respective agreement, including termination of the contractual bond between ENEVA and the Third party, without prejudice to the administrative, civil or criminal sanctions, when applicable, pursuant to the respective legislation.

5.5. General Commitments

ENEVA will promote periodic training on this Policy and on the Anticorruption Legislation for all its Employees.

Rules addressing gifts, presents, advantages, donations and sponsorship, conflicts of interest, Relations with Third parties and interactions with the Public Authorities in general, whenever published by ENEVA, shall be interpreted together with this Anticorruption Policy.

In case of doubts as to which will prevail, the Employee or Third Party should contact the Compliance area.

6. REFERENCES

- **PL.CRP.CMP.002** – Code of Conduct
- **DT.CRP.CMP.008** – Code of Conduct for Third parties
- **DT.CRP.CMP.007** – Guideline for Interaction with the Public Authorities
- **DT.CRP.CMP.002** – Guideline for Conflicts of Interest
- **DT.CRP.CMP.003** – Guideline for Gifts, Presents and Hospitalities
- **DT.CRP.COM.001** – Guideline for Donations and Sponsorship
- **DT.CRP.CMP.001** – Guideline for Management and Consequences