

## CODE OF ETHICS AND CONDUCT

### INTRODUCTION

This Code of Ethics and Conduct is intended for all employees of VA Engenharia units, regardless of hierarchical level, to preserve and strengthen the company's institutional values.

The objective of this Code of Ethics and Conduct is to define a standard of behavior expected for all those who work and collaborate with VA Engenharia and who somehow share the same work environment and the daily routine of the company.

Our posture must be based on respect, ethical behavior, transparency and commitment to the truth.

### MISSION

Promote solutions in technology, management and rational use of electricity, contributing to sustainable development through clean energy.

### VISION

To be a national reference in innovative solutions for sustainable energy.

### VALUES

Ethics in all relationships and operations;

Commitment to sustainability and occupational safety;

Ability to understand the client's needs;

Respect for the employee;

Team work.

### WHO SHOULD FOLLOW THIS CODE?

The Code of Ethics and Conduct applies to all VA Engenharia units and to all those who work or, in some way, provide services to the company: employees, interns, directors, advisors, service providers, partners, representatives and other employees.

### HOW TO USE THIS CODE?

Read, understand and act in accordance with the Code of Ethics and Conduct.

It is the employee's responsibility to be aware of all the contents of this Code, to respect it and to practice it.

Omission to read it does not exempt the employee from acting in accordance with the ethical standards and conduct transcribed here.

### RESPONSIBILITY OF ALL

Participate in training programs and events, whenever requested by your immediate manager, or as VA Engenharia's updating policy.

Obtain guidance to solve problems, in case you don't know how to proceed in a certain situation, as well as ask and question your manager or co-workers.

Inform the responsible people (area and HR manager and/or Board) about possible violations of this Code of Ethics and Conduct, it is everyone's duty/commitment.

## ANTI-CORRUPTION AND ANTI-BRIBERY PRACTICES

VA Engenharia does not admit the payment or receipt of bribes, direct or indirect advantages, from suppliers, customers or partners, and does not allow its employees to seek direct or indirect favors through the offer of gifts, premiums, contracts, business or special sponsorships.

Employees may not accept gifts, presents or any other type of favoring from customers, suppliers or partners of the company, which may translate into some form of obtaining personal advantage or for third parties (relatives, friends, etc.).

Therefore, the company's employees may not receive any values or advantages of any nature, directly or indirectly, from suppliers, customers or partners of VA Engenharia, either before, during the negotiation, or after the validity of the respective contract.

### COMPANY'S PROPERTY INFORMATION AND ITS CONFIDENTIALITY

The employees have the obligation to protect and not disclose confidential information that they may obtain or create related to the activities performed for VA Engenharia, regardless of its form.

The protection of confidential information is not limited to protect it against misuse, but also to use it only for the performance of their professional duties.

The employee must not disclose confidential information regarding any customer, supplier, or VA Engenharia employee, unless expressly authorized for such purpose.

The employee must take precautionary measures to avoid the unauthorized disclosure of confidential information. Thus, the collaborator must also take the necessary measures to ensure that the documents related to the business are produced, copied, sent by e-mail, transported, archived, stored and discarded in the manner designed to avoid unauthorized access to this information.

The employee must also ensure that access to work areas and computers is properly controlled and should not discuss delicate matters or personal or confidential information in public places such as elevators, corridors, restaurants, bathrooms and public transportation, through the Internet or any other electronic means (including personal/social relationship sites), and should be careful when using cell phones or other communication devices or message transmission services.

### RELATIONSHIP IN THE WORK ENVIRONMENT

Our coexistence should be based on respect, transparency and team spirit.

It is our commitment:

To work so that, in the search for results, the spirit of collaboration with colleagues prevails;

To maintain an ethical attitude of respect, courtesy and cooperation with all colleagues, clients, suppliers and business partners;

To recognize diversity, respecting differences and individual values, regardless of hierarchical level, position or function, without discriminating color, race, nationality, creed, age, physical characteristics, sexual orientation and party-political positioning;

Fight any type of intimidation that characterizes sexual harassment or moral harassment (this extended as the act of

disqualifying people and/or their reputation through words, gestures or attitudes in the work environment);

To preserve the integrity of the position, without using the position or position in the company or information related to VA Engenharia or its clients, suppliers or employees to influence decisions that may favor private interests or those of third parties;

Recognize the authorship of projects, ideas, proposals and initiatives, both from colleagues and third parties;

Keep under secrecy and confidentiality all information and subjects related to the activities of VA Engenharia, its customers, suppliers or employees, particularly about commercial or competitive information;

To use means of communication provided by VA Engenharia (electronic mail and others) in a limited way, that is, only for subjects directly related to its work;

To use the work materials in a responsible and adequate manner, taking care of the integrity and security of the equipment supplied by the company to perform the work, returning them immediately after the use, forbidden to use them for private purposes;

To ensure and contribute to the full compliance with this Code of Ethics and Conduct.

#### PERSONAL BEHAVIOR OF EMPLOYEES

VA Engenharia counts on a courteous interpersonal relationship, polite, avoiding personal offenses, double sense jokes and the use of nicknames and low slang words, avoiding offenses, discussions and conflicts during the working day.

VA Engenharia's equipment and materials must be taken care of in order to avoid accidents, losses, damages and prejudices.

When made available by the company, the use of vehicles must be made in a conscious way, respecting the traffic legislation and keeping them always clean.

It is the responsibility of each one of the employees to preserve the order in all the company's enclosures, especially those of common use, such as bathrooms, canteens, stairs and corridors, meeting rooms, among others.

Use your potential by discovering alternatives that improve your work and share with your manager whenever an idea arises that can add value and contribute to the development of the work area and the company.

VA Engenharia will have a zero tolerance posture with those who commit theft, forgery or any other illicit act. Therefore, work with responsibility, honesty and integrity.

Remember that each position or function demands different postures and responsibilities.

Respect your work colleagues professionally and also morally.

The exercise of professional activities under the effect of alcohol or illegal drugs will not be tolerated.

VA Engenharia does not accept the propagation or disclosure of rumors and pornography.

The employee must not develop external activities that compete with the company's business.

Participation and interest: Don't show attitude that the problem doesn't concern you, even if it is directed to another sector; you are part of VA Engenharia!

#### ETHNIC, SOCIOECONOMIC, CULTURAL, RELIGIOUS AND SEXUAL DIVERSITIES

VA Engenharia does not admit any kind of discriminatory manifestation of any nature (race, color, age, sex, sexual orientation, religion, physical or mental incapacity, ethnic precepts, socio-cultural condition, nationality or marital status) directed to any person.

#### MORAL AND SEXUAL HARASSMENT

The company will be rigorous, including in punishments, of eventual moral or sexual harassment. Moral harassment conducts are those capable of denigrating the dignity of any person or that generate an intimidating, hostile or offensive work environment.

All conducts of sexual harassment defined by law are considered, including attitudes such as repeated proposals or sexual, verbal, gestural or physical innuendo.

#### ROLE OF THE LEADER

VA Engenharia understands that leaders have a fundamental role in the fulfillment of this Code and expects from them the following postures:

To set an example regarding the conducts suggested in this material;

Comply with the legislation;

To recognize and value the merit of employees and collaborators;

Provide equal access to opportunities for professional growth, according to the characteristics, competencies, skills and contributions of each employee;

Not to make decisions affecting the professional career of employees and collaborators based on personal relationships. Decision making should be based on objective and meritocratic criteria;

Do not use the position to solicit favors, advantages or personal services from employees and collaborators;

Comply with, disclose and promote the Code of Ethics and Conduct and enforce it by employees and collaborators.

#### RELATIONSHIP WITH CUSTOMERS

In the relationship with customers is our duty:

To establish transparency in business practices;

Respect the sectorial agreements and contracts signed, within the legal limits;

To assume an open and interested posture in relation to criticism and suggestions;

Ensure that the client receives a clear, agile, objective and satisfactory response to their questions and requests;

Recognize and communicate any misconceptions or inaccuracies committed;

Respect privacy, ensuring that information about the client is treated confidentially and used on a confidential basis, only with their knowledge;

Base marketing and communication strategies on clear objectives so that the client has no doubts about the quality of the product and/or service acquired.

#### RELATIONSHIP WITH SUPPLIERS

In this relationship, we must always:

Comply with the agreements and contracts signed, within the legal limits;

Base the selection and decision to acquire products and services exclusively on technical, objective and professional criteria, through predetermined processes;

Keep a clear and transparent communication during the whole process, without creating expectations that cannot be fulfilled for reasons exclusive to VA Engenharia;

To disseminate and stimulate the compliance with this Code of Ethics and Conduct, as well as to foster the adoption of a relationship standard and posture compatible with what we adopt.

#### RELATIONSHIP WITH THE PUBLIC SECTOR

VA Engenharia values the good relationship with the public sector and its employees, in all its administrative spheres and interaction modalities, and avoids all the actions that can be interpreted as harmful acts to the Public Administration foreseen in the national legislation.

In this sense, it is our commitment:

Not to promise, offer, give, directly or indirectly, to any authority or server of the public administration, federal, state or municipal, or the third person related to it, any payment in cash, gifts, services, entertainment or other benefit that characterizes or may raise suspicions of undue advantage;

VA Engenharia will not practice any of the following actions regarding bids and contracts:

Frustration or fraud, by adjustment, combination or any other expedient, the competitive character of a public bidding procedure;

Unfairly prevent, disturb or fraud the performance of any act of public bidding procedure;

Deflect or seek to deflect a bidder, by means of fraud or offering an advantage of any kind;

Fraudulent public bidding or contract arising therefrom;

Manipulate or fraud the economic-financial balance of contracts entered into with the public administration.

#### CONFLICTS OF INTEREST

It is of utmost importance to avoid situations, actions and attitudes that may characterize or suggest conflicts between our personal interests and our professional performance.

In any case, one should not use the function exercised at VA Engenharia to obtain privileges or any kind of advantage, preserving the position or activity exercised, without ever using

them in benefit or self benefit, being that the deviation of services of the company to obtain self interest will be considered as a sufficient reason for the termination of the employment contract for just cause.

#### ATTENDANCE RECORD

VA Engenharia uses the Electronic Point Register. Its correct appointment is the responsibility of each collaborator.

This appointment is mandatory and must be made daily, four times a day (entry, departure for the break, return of the break and end of the day) according to the employment contract of each employee.

If the employee does not make the correct appointment, he must immediately inform the HR.

The absences and unjustified delays will be deducted in their entirety, according to the provisions of the Consolidation of Labor Laws (CLT) and other applicable legislation.

#### ABSENTEEISM ALLOWANCE

The medical certificates, decisions of aid granted by the INSS, certificates of court attendance, of Military and Electoral Enlistment, must be presented in the HR of the company within 48 working hours.

The employee who presents an adulterated document will be subject to internal penalties, the adoption of appropriate judicial measures, in addition to communication to the police authority, when the case.

#### UNIFORM AND PERSONAL PRESENTATION

VA Engineering provides uniform to the occupants of positions where its use is mandatory, so it will be up to the employee to keep it in perfect condition and use it correctly.

The employee must avoid the use of uniform outside the work environment.

The employee that is using the VA Engenharia uniform in external acts that involve police occurrences or any acts that can denigrate the company's image will be subject to the applicable internal penalties.

The collaborators must present themselves in appropriate clothes and in accordance with the work environment, whatever the position or the department. Items whose use is not compatible with our company's practice are not acceptable.

#### COMMUNICATION, EQUIPMENT AND TECHNOLOGY

VA Engenharia provides all the technology subsidies necessary for the employee to carry out their daily professional activities in the best possible way. Therefore:

The communication services provided are company resources, including electronic mail (e-mail), internet, telephones and cell phones. Use them in an efficient, responsible and conscious way;

All materials and equipment supplied by VA Engenharia (vehicles, software, machines, tools, etc) to the employees, are of EXCLUSIVE use in working hours and on behalf of the company;

The employee who uses the activities performed by the company, as well as the equipment supplied by VA Engenharia with the purpose of providing services to customers in their own economic

benefit, will be considered INADMISSIBLE and subject to dismissal for just cause;

No VA Engenharia document can be transferred or copied for any personal or private purpose, or sent to third parties without the express authorization from the responsible of each sector;

All commercial, technical, strategic and professional information concerning VA Engenharia, its clients, suppliers, partners and/or collaborators must be treated with the most absolute confidentiality;

The confidentiality of the information of customers and partners is the responsibility of all employees, being prohibited the transfer of the information to third parties without the prior authorization of the responsible area;

The collaborator must follow all the norms, procedures and safety recommendations adopted by VA Engenharia;

In relation to the use of relationship sites and social networks/media (e.g.: LinkedIn, Facebook, Twitter, Instagram, etc.), even if the use is through your computer or personal cell phone, AVOID:

Post negative comments about your work, manager, customers or the company itself;

Post/reply derogatory comments about competitors;

Comment on VA Engenharia internal matters in public forums;

To pronounce on behalf of VA Engenharia and/or to enter in confrontation with third parties about issues of interest of the company.

#### HEALTH AND SAFETY AT WORK

A safe and clean working environment is important for the health and well-being of everyone at VA Engenharia.

VA Engenharia guarantees to all its employees adequate working conditions, based on the principles of hygiene, health, comfort, salubrity and safety at work, carrying out actions preventive and corrective. However, it is the employees' responsibility to be aware of the rules and procedures for performing their professional activities, preserving their integrity and that of their colleagues.

Therefore, it is mandatory the use of PPE's supplied by the company, and the accomplishment of medical exams foreseen in the Regulatory Norms.

In case of accidents of typical work or of course, it is of responsibility of the injured collaborator to guarantee the communication of the fact to his hierarchical superior or to the department of HR.

Outsourced professionals must also follow the company's safety standards.

#### CONSUMPTION OF ALCOHOLIC BEVERAGES AND ILLICIT DRUGS

VA Engenharia does not allow the consumption of alcoholic drinks and illicit drugs inside its facilities, as well as, that its employees are under the effect of alcoholic drinks and illicit drugs during the day and/or in the work environment, including in trips, events, trainings, meals or in external businesses performed by VA Engenharia.

The employee who is caught consuming alcoholic beverages or illicit drugs inside the work environment or who is working under their effect, will be subject to internal penalties (verbal and written warning, suspension or dismissal, as provided by the legislation), and the adoption of the applicable judicial measures, besides the communication to the police authority, when the case.

#### VIOLATION OF THE CODE OF ETHICS AND CONDUCT

Every employee should read and understand the policies, guidelines and practices expressed in this Code, asking HR for pertinent clarifications in case of doubts or omissions.

In case of violation of any rule established in this Code, the appropriate disciplinary measures will be adopted, in the order of verbal and written warnings and suspensions. The consequences of the violations may include up to the termination of the employment contract (dismissal for just cause), in the case of employees, and contract termination, in the case of suppliers and service providers.

The employee's omission to bring to VA Engenharia's attention possible violations by third parties or other employees will also be considered unethical conduct.

VA Engenharia will maintain absolute secrecy about the identity of those employees who report or participate in the investigation of possible violations to this Code by third parties or other employees.

VA Engenharia will not tolerate any retaliation against any collaborator who, in good faith, has sought or given knowledge, or who has reported a possible violation. However, the employee who makes a report that he knew or should have known to be false, in order to unfairly harm the reported, will be subject to disciplinary punishment.

#### CRITICISM AND SUGGESTIONS

Criticism and suggestions that aim to aggregate and stimulate improvements for VA Engenharia are constructive, encouraged and welcome, and should be forwarded to its manager, to HR or to the VA Engenharia Board of Directors.

## TERM OF COMMITMENT TO THE CODE OF ETHICS AND CONDUCT

I received on this date a copy of the Code of Ethics and Conduct of VA Engenharia and I am committed to fully comply with it, because I know that it represents the expectations of the company in relation to my ethical and professional conduct. I am aware that failure to comply with the provisions of this Code may lead to the application of warnings, suspension and even termination of my employment contract for just cause depending on the seriousness of the infraction committed.

I am responsible for avoiding any activity or relationship that may interfere with my ability to act objectively, honestly and always seek the best interests of the company.

I agree to cooperate with VA Engenharia in everything related to the implementation and dissemination of the Code of Ethics and Conduct.

In agreement and aware.

Name:

Place and Date:

Signature: