



ANTI-CORRUPTION POLICY

**DEGREE OF SECRECY:**  
GS1 – PUBLIC

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## POLICIES AND GUIDELINES

# ANTI-CORRUPTION POLICY

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## **1 OBJECTIVE**

Brava has ethics and integrity as fundamental values in conducting its business. With the commitment of the Company's Senior Management, the main objective of this Policy is to prevent any violations of the rules applicable to Brava, especially the Anti-Corruption Laws, as well as to allow the Company to promptly respond to any suspicions of misconduct.

## **2 APPLICATION AND SCOPE**

Brava's Anti-Corruption Policy applies to the Company, its subsidiaries and potential partners, as well as to all officers, members of the Board of Directors, Advisory Committees and Fiscal Board, if established, employees, agents, representatives and any other person associated with Brava. The company expects all its Employees and Third Parties to comply with the rules of this Policy and its other Compliance Policies.

This Policy meets the requirements of the main Anti-Corruption Laws as well as international Compliance parameters and must be applied jointly with Brava's other Compliance Policies.

## **3 DESCRIPTION**

Brava has zero tolerance for unethical practices, acts of corruption or any other illicit act carried out directly by its Employees or by Third Parties linked to the Company. Any act aimed at obtaining an undue advantage by Employees, whether by donating, promoting or offering anything of value to a Third Party (including gifts, hospitality or entertainment) is also prohibited. Likewise, Employees may not ask for or accept anything of value with the aim of obtaining any undue advantage.

In the event of a violation of this Policy, those involved may be subject to disciplinary measures described in Brava's Code of Ethics and Conduct, in addition to possible criminal, civil and administrative liability before the competent authorities. Therefore, we expect the commitment of all Employees and Third Parties to comply with this Policy, to maintain ethics as the main vector in the conduct of Brava's activities and avoid liability for unlawful acts.

All Employees must receive, read and certify in writing that they have become aware of this Policy, agree to comply with it and report any possible violations (ANX-01-POL-GRC-002 - Certificate of Acknowledgement and Commitment).

In addition, the Compliance area must implement communication and training actions in the context of the Compliance Program, including the topics addressed in this policy. All summoned Employees and Third Parties have the duty to attend and participate in the mandatory trainings of the Compliance Program.

Be sure to consult Brava's other Compliance Policies and contact the Compliance area if you have any questions.

## **4 OUR ANTI-CORRUPTION POLICY**

### **4.1. Prohibition of undue advantages**

Employees and Third Parties may not give, promise or offer any Undue Advantage, directly or indirectly, to a Public Official, national or foreign, or to a third party related to them.

The Undue Advantage may occur through payment in the form of (i) money; (ii) gifts; (iii) debt forgiveness; (iv) loans; (v) personal favors; (vi) entertainment, dining, and trips; (vii) donations aiming a quid pro quo; (viii) business opportunities; (ix) medical assistance, among others.

Employees may not, under any circumstances, accept or receive undue advantages. If any Employee receives any request to pay or receive undue advantages, the request must be immediately rejected and reported to their immediate manager and to the Compliance Officer directly.

Likewise, if any Employee knows or believes that any undue advantage has been or may be realized within the Company, they must report such information to the Compliance Officer or to the Whistleblowing Channel indicated in Brava's Code of Ethics and Conduct.

In accordance with Brava's Code of Ethics and Conduct, no action will be taken against an Employee or Third Party who, in good faith, reports suspected violations of this Policy, Brava's Code of Conduct or Anti-Corruption Laws.

### **4.2. Interactions with Public Authorities**

#### **4.2.1. Public Officials**

The rules of interaction with Public Officials must be strictly observed by all Employees, who are subject to disciplinary measures and even the termination of agreements and contracts with Third Parties in case of violation of this Policy.

Employees are expected to behave with integrity and transparency in all interactions with Public Officials, including during any inspections carried out at the Company's facilities or when obtaining licenses and authorizations from Public Authorities.

The Company's Employees must communicate accurately and completely, as well as keep recorded and documented all communications made with Public Officials. Communications with Public Officials must occur exclusively through official channels, such as the Public Official's functional e-mail address, telephone number of public entities and official letters with the letterhead and numbering of the Public Authority.

Likewise, communication by Employees must be made exclusively through the corporate devices provided by the Company, especially for Employees who interacts with Public Officials. Communication must always be transparent and ethical. The main corporate devices made available by the Company are:

- Functional emails;
- Telephone numbers;
- Official correspondence (with Brava letterhead and control numbering).

Once the Employee has received the corporate device, it is strictly forbidden to exchange of information through personal devices, as well as through the Employee's personal accounts, applications and email addresses. Likewise, communication through the Public Agent's personal devices, accounts and email addresses is strictly prohibited.

In cases where the Employee does not have access to corporate devices, for any reason, all restrictions and recommendations of this Policy remain valid.

It is possible to hold meetings with Public Officials through virtual tools. It is recommended, preferably and whenever possible, using the "Microsoft Teams" tool officially made available by the Company. Meetings with Public Officials, both virtual and face-to-face, must be attended by at least 02 (two) Employees and a prior agenda must be observed, indicating the meeting schedule, the subjects to be discussed and the Employees and Public Officials who will participate. Eventually, in specific cases and in the Company's interest, the need for a second Employee may be waived, such as in the case of face-to-face meetings in locations where there is no more than one Employee acting in the institutional or technical relationship role, provided that the Compliance Area and the Executive Board are informed and authorize in advance. The specific exemption of the presence of a second Employee does not waive the need for the evidence described below.

Within 5 days of the meeting, an Interaction Form with Public Officials, made available by the Compliance area via the *Compliance Cloud* portal must be filled in, along with any other type of evidence, such as emails, minutes, etc. The evidence must contain the topics discussed during the virtual or face-to-face meeting, indicating the date, time, place, participants, the procedure adopted for scheduling the meeting and the signature of the Employees present during the meeting.

Employees must file the evidence in a defined folder or location and/or send it by e-mail to the Compliance area.

In cases where Employees routinely interact with Public Officials, whether in person, virtually or by telephone, the Form may be filled out once a month with a summary of the interactions. However, in the event of any situation that could potentially violate Brava's Compliance Policies or any relevant

legislation, the Employee must immediately report any situation that is out of the ordinary to the Compliance area.

It is important to remember that all communication with Public Officials, regardless of the means used, must follow basic rules of formality, to avoid the belief from the Public Official, in any way, that there is a personal relationship with the Employee. As an example, the Employee must avoid calling the Public Agent "friend", "colleague", "pal", "mate" or other expressions that may entail the interpretation that there is some personal relationship with Brava, during the interaction with its Employees or Third Parties.

Note that Brava can monitor conversations and documents exchanged by Employees through their corporate devices, as set forth in the Code of Ethics and Conduct and in the Confidentiality and Data Protection Policy.

Brava does not allow Employees to make false statements to Public Officials on behalf of the Company or to obtain information provided by the Public Agent that may be characterized as Privileged Information or that violates the rules of the Access to Information Law.

#### **4.2.2. Licenses, Permits and Authorizations**

In order to carry out its activities, Brava must obtain licenses, permits and authorizations from different government agencies, in particular, authorization issued by ANP, a Declaration of Conformity issued by the Brazilian Navy, licenses issued by the Fire Department and environmental licenses issued by IDEMA and IBAMA.

Thus, the rules of interaction with Public Authorities must be observed during the process of obtaining licenses, authorizations and other acts from the Government.

In addition, Employees must allow Public Officials to carry out inspections and assessments whenever requested, and must communicate to the responsible areas whenever made aware of possible inspections that will take place on Brava.

Brava does not authorize its Employees to offer any type of undue advantage to Public Officials, especially with the objective of expediting routine actions under the Company's responsibility or to ensure the obtaining of licenses, permits or authorizations. Those Employees responsible for obtaining licenses, permits or authorizations must ensure that no offer or acceptance of undue advantage occurs before, during or after obtaining such public acts.

Any Third Party hired by the Company to act on its behalf in obtaining licenses, permits or authorizations must be monitored more closely and must be previously assessed and approved in accordance with Brava's Third Party Due Diligence Procedure.

### **4.2.3. Public Bids**

Brava participates in Public Bids, whose procedure requires a high level of interaction between the Company and the Government. For this reason, all Employees involved in Public Bids must strictly observe the rules for Interaction with Public Authorities set forth in item 4.2 of this Policy, as well as the following provisions:

- To treat the matters discussed with absolute confidentiality, and it is forbidden to share information with people not involved in the bidding process, including on whether or not Brava will participate in the public bid;
- Acting independently in deciding whether or not to participate in a public bidding, in analyzing the public notice, in determining the value of the bid, in contesting or filing an appeal. Any alignment with third parties, especially competitors, is strictly forbidden;
- Refrain from contacting, by any means, the bidding Public Authority or any competitors to obtain information not available in a public source or undisclosed to the market;
- Abstain from any conduct that may inhibit the competitive nature of the bids;
- Copy a member of the Executive Board in all communications made with Public Officials by e-mail. All contacts with Public Officials must be formally informed to those involved in the bid and to the Executive Board. If the contact is by telephone, as soon as it is over, a written report of the main points discussed must be sent.
- All actions and communications related to the public bid must be recorded and registered for a period of up to five (5) years.

The same precautions for interaction with Public Officials must be observed in interactions with private parties during and after the conclusion of the bidding process.

#### **4.2.3.1. Public Contracts**

When entering into public contracts, those responsible for interacting with Public Officials must be defined at the beginning of the contractual negotiations, including the contract manager, those responsible for payment and those responsible for any contractual changes and amendments. Depending on the complexity or integrity risks involved in the contract, these Employees may receive specific training provided by Brava's Compliance area.

Every public procurement must be analyzed by Brava's Compliance and Legal areas, with an annual reassessment of the risks of the contract, for as long as it remains in force.

Depending on the term of the contract with the Public Authority, there may be a rotation of the Employees involved in the management of the contract to prevent the same Employee from interacting for a long period with the same Public Officials.

#### **4.2.4. Hiring Public Officials or Former Public Officials**

Hiring Public Officials or former Public Officials, as well as PEP, may expose Brava to integrity risks. Such hiring can only take place based exclusively on the technical knowledge of the provider and/or to offer technical assistance to Brava's decisions. Under no circumstances will the hiring be allowed to facilitate Brava's access to Public Authorities or to obtain Privileged Information.

Special attention must be given to quarantine periods for hiring former Public Officials, in accordance with Law No. 12,813 of 2013 or any other specific law that may be applied.

In addition, caution is required when hiring relatives or partners of Public Officials, as this can be used to conceal illegal activities, and may produce conflicts of interest described in Brava's Code of Ethics and Conduct.

All the cases described above must be assessed individually and the hiring of individuals subject to these provisions must be analyzed by the Compliance area, which may request the support of the Ethics and Integrity Committee for approval, if necessary, as well as applying any mitigating measures.

### **4.3. Gifts, Presents, Entertainment and Hospitality**

Gifts, Presents, Entertainment and Hospitality may be part of Brava's routine, provided that the rules contained in this Policy and in Brava's Gifts, Presents, Entertainment and Hospitality Procedure are observed.

Employees are not authorized to offer, promise, receive or demand payments, Gifts, Presents, Entertainment and Hospitality and non-promotional favors with the purpose of giving or obtaining an undue advantage or benefit in dealings with Public Officials, clients and Third Parties.

The offering of Gifts, Presents, Entertainment and Hospitality may not occur on a habitual basis to the same Employee, Public Official, Third Party or client. More than twice in a period of 12 (twelve) months will be considered habitual.

In addition, Employees must ensure that the offer of any Gift or Present is in accordance with potential policies applicable to the recipient, as well as local customs and practices.

More detailed provisions regarding these items are contained in the Gifts, Presents, Entertainment and Hospitality Procedure and must be observed by all Employees and Third Parties.

#### 4.4. Donations and Sponsorships

Brava may make philanthropic donations and sponsorships, both as a social action measure and to reinforce its image and brand. In such cases, the potential recipient of the contribution must be subjected to a prior integrity due diligence conducted by the Compliance area. After the diligence is carried out, a recommendation will be drawn up for deliberation by the Executive Board.

Donations and sponsorships are strictly forbidden: (i) for purposes other than those submitted to the Compliance analysis; (ii) that are not related to the activities carried out by the beneficiary entities; (iii) that aim to obtain undue commercial, regulatory or other benefits for Brava; (iv) to entities related to a Public Official or a third party connected to them; and (v) for entities that do not have the same ethical values and social commitments as Brava.

Beneficiaries must be informed about the provisions of this Policy and Brava's Code of Ethics and Conduct and must undertake to follow them for the donation or sponsorship to occur.

All donations and sponsorships made by Brava must be formalized in writing, properly recorded and monitored to ensure the correct destination of the asset/good, in accordance with the Donations and Sponsorships Procedure and the Donations and Sponsorships Compliance Term.

##### 4.4.1. Political and Electoral Donations

Brava, as a private entity, is strictly prohibited from making any type of political or electoral contribution. Likewise, Employees are prohibited from making donations of this nature on behalf of the Company or using its resources and structures.

If an Employee wishes to make an electoral donation, they must make it in their own name, with their own resources and without any link to Brava.

#### 4.5. Relationship with Third Parties

Employees who deal with Third Parties are responsible for taking reasonable precautions to ensure that business involving Third Parties is conducted ethically and fully complies with this Policy, such as:

- Ensure that Brava's Third Party Due Diligence Procedure has been applied;
- Include anti-corruption clause in contracts;

- Require the Third Party to certify in writing that it has not violated and will not violate any Anti-Corruption Laws during the course of its business with the Company;
- In the situations indicated by the requesting area, the Third Party will previously disclose to the Company the need to outsource the contracted services, especially in cases of acting on behalf of, in the interest of or for the benefit of Brava;
- Monitor the reasonableness and legitimacy of the services provided, as well as the amounts paid to Third Parties during the contract;
- Make this Policy and the Code of Ethics and Conduct available to the Third Party, collect and archive the respective terms of acknowledgement and commitment;

Employees must pay special attention to and closely monitor Third Parties with high Integrity risks, as defined in the Third Party Due Diligence Procedure, especially those who interact with Public Officials on behalf of Brava.

Employees and Third Parties must be aware that agreements and contracts may be terminated in the event of violation of Brava's Compliance Policies and applicable legislation, notably Anti-Corruption Laws.

#### **4.6. Record Keeping and Internal Controls**

All of Brava's expenses and expenditures must be accurately reflected in the Company's financial and accounting records and all payments made by or on behalf of the Company must be duly authorized in accordance with Brava's Compliance Policies.

Employees must follow all applicable rules, principles, laws and practices when preparing Brava's accounting and financial record reports, in a complete manner and within the deadlines, and must ensure that no payment is made for purposes other than those accounted for by the Company. False or artificial entries must not be made in the Company's books and records for any reason.

The Compliance area is the main responsible for supervising and enforcing this Policy. The Company will carry out periodic internal and external audits, coordinated by the Internal Audit area, which will be reported to the Audit Committee, on its books and records to monitor compliance with this Policy.

#### 4.7. Economic Sanctions

Economic Sanctions are restrictions imposed by governments or international organizations (such as the United Nations) and generally aim to (i) punish a conduct; or (ii) compel the sanctioned individual, entity, or country to change its current conduct.

Restrictions can be financial, commercial, of movement and bans directed against individuals, companies or countries.

Brava strictly prohibits violations of Economic Sanctions applied by governments and organizations and expects Employees to promptly raise any issues related to the topic.

#### 4.8. Whistleblowing Channel

Any violation or suspected violation of this Policy must be reported to Brava's Whistleblowing Channel, by calling 0800 810 8543, through the website [www.contatoseguro.com.br/bravaenergia](http://www.contatoseguro.com.br/bravaenergia) or in person to the Compliance area.

Communications can be made anonymously, and Brava prohibits any kind of retaliation against Employees or Third Parties who make reports in good faith. Brava also guarantees, to the extent permitted by law, total secrecy and confidentiality of the investigation of the facts.

Brava encourages and supports the filling of complaints on its Channel and emphasizes that the reports will be used to identify flaws in the Compliance Program and to constantly improve its Program.

We count on everyone's collaboration!

### 5. DEFINITIONS

**BRAVA OR COMPANY:** Brava Energia and all its subsidiaries and subsidiaries.

**PUBLIC OFFICIAL:** Anyone who holds office, position, employment or function for the Government, even temporarily or without remuneration, by election, appointment, designation, contract or any other form of investiture or bond.

**ANP:** National Agency of Petroleum, Natural Gas and Biofuels.

**BENEFICIARY:** Any non-profit institution that receives a donation or sponsorship from Brava Energia.

**WHISTLEBLOWING CHANNEL:** Channel available for communications, anonymous or not, of doubts, violations or suspected violations of the provisions of the Code of Ethics and Conduct, this Policy and other policies of the Company and current legislation.

**EMPLOYEE:** All of the Company's employees, regardless of their hierarchical level, including members of boards and committees, officers, managers, employees, interns and trainees.

**COMPLIANCE:** Ensuring ethical compliance with the principles and values, reflected in the Company's internal policies, procedures and standards, and with the laws and regulations to which it is subject, in order to avoid misconduct and preserve the generation of economic, environmental and social value of the entity.

**COMPETITORS:** Companies that operate in the same line of business and carry out commercial activities similar to those of the Company.

**EXECUTIVE BOARD:** Collegiate body formed by the members of the Company's executive board, elected by the Board of Directors, with at least one Chief Executive Officer, one Investor Relations Officer, one Chief Financial Officer and the others without specific designation. All the Officers shall be residents in the country and shall have a unified term of office of two (2) years and may be reelected.

**CORPORATE DEVICE:** Any device provided by the Company for professional purposes, such as electronic address, computers, cell phones, etc.

**ETHICS:** A collection of value judgment or moral standards present in a person, society or social group.

**ETHICS AND INTEGRITY COMMITTEE:** Group made up of the Compliance Officer and, if applicable, members of the Compliance area, as well as a minimum of two (2) and a maximum of four (4) Managers and/or Officers of the Company. In addition, the presence of a member of the Board of Directors is optional. The members of the Ethics and Integrity Committee will assist the Compliance area in making its decisions and in the proper functioning of the Company's Compliance Program. The appointment of its members is the responsibility of the Executive Board and approved by the Board of Directors.

**ANTI-CORRUPTION LAWS:** A set of national and international laws, decrees, ordinances, and instructions that aim to prevent irregular conducts such as fraud, bribery, corruption, and other illicit practices, especially the Anti-Corruption Law (Federal Law No. 12,846/2013), Federal Decree No. 11,129/2022, the Brazilian Penal Code; the Administrative Improbity Law (Federal Law No. 8,429/1992); the Anti-Money Laundering Law (Federal Law No. 9,613/1998); the Public Bidding Law (Federal Law 8,666/1993 and Federal Law 14,133/2021); the Electoral Code (Federal Law 9,504/1997), the Law for the Prevention and Repression of Infractions against the Economic Order (Federal Law 8,884/1994 and Federal Law 12,529/2011); the U.S. Foreign Corrupt Practices Act (FCPA) and Foreign Extortion Prevention Act (FEPA), and the U.K. Anti-Bribery Act (UKBA).

**POLITICALLY EXPOSED PERSON (PEP):** Person who holds or has held, in the last 5 years, relevant public positions, jobs or functions, as well as their family members and close collaborators, under the terms defined by COAF Resolution 40/2021.

**PUBLIC AUTHORITY:** Includes the national Public Administration, direct, indirect or foundational of any of the Branches of the Union, the States, the Federal District, the Municipalities, the Territory, of Company incorporated into the public coffers or an entity for whose creation or funding the treasury has contributed or contributes more than fifty percent of the assets or annual revenue.

**COMPLIANCE POLICIES:** Policies designed to establish rules within the Company, with which all Employees must comply, with the aim of fully complying with the main Laws, Decrees, Ordinances, Resolutions or Instructions applicable to the Company, especially those that aim to combat fraud, crime or corruption.

**COMPLIANCE PROGRAM:** The compliance program, in the context of Decree No. 11,129/2022, refers to the set of internal mechanisms and 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 (i) preventing, detecting, and remedying deviations, fraud, irregularities, and illegal acts committed against the public administration, national or foreign; and (ii) fostering and maintaining a culture of integrity in the organizational environment.

**THIRD PARTY:** Anyone who is not an Employee of the Company, but who is contracted or subcontracted to supply goods or services or represent or act on behalf, benefit or interest of Brava, as well as those who act as customers and business partners of Brava.

**UNDUE ADVANTAGE:** Any advantage that is not authorized by the legal system and that is offered or granted to a public official, by whom (individual or legal entity) has a direct or indirect interest in an act arising from their duties.

## 6. REVIEW OF THE POLICY

The Compliance Area will carry out an annual review of this Policy and the Company's other Compliance Policies, at least every 2 years or when there are changes in the applicable legislation and standards and, whenever necessary, changes and adjustments will be proposed to preventively minimize any operational risks and non-conformities.

## 7. DOCUMENTATION RECORDS

ANX-01-POL-GRC-002 - Certificate of Acknowledgement and Commitment

## 8. ANNEXES

ANX-01-POL-GRC-002 - Certificate of Acknowledgement and Commitment

**9. REVIEW BOARD**

REVISION	DATE	REVIEW DESCRIPTION
00	12/06/2020	Initial Issue
01	14/10/2020	Review in accordance with the new market regulation of B3 – Brasil, Bolsa e Balcão.
02	27/05/2021	Translation into English.
03	27/07/2021	Inclusion of code. Updating the cover and adding a level of secrecy.
04	16/12/2021	Review resulting from critical analysis to improve the 3R Integrity Program
05	27/01/2022	Amendment to the constitution of the Compliance Committee
06	24/03/2023	Inclusion of critical analysis improvements and contributions from Company Employees
07	07/08/2023	Removal of the reference document, Standard PG-CORP-SMS-001 – Integrated System Manual, as the manual has no connection with this policy. Adjustments to the document format. Thus, the approval made by the Council for revision 06 remains valid for revision 07.
08	17/12/2024	Review due to the merge between 3R and Enauta.