

CODE OF ETHICS AND CONDUCT

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1 from 22**POLICIES AND GUIDELINES****CODE OF ETHICS AND CONDUCT**

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1 MESSAGE FROM THE ADMINISTRATION

Brava Energia maintains an unwavering commitment to ethics, integrity, efficiency and effectiveness, guiding its activities transparently and in compliance not only with the law, but also with the best market practices. These fundamental principles are central to the Company's strategic objectives.

Brava cherishes the principles and values established by the Company and considers corporate Ethics and Integrity to be one of the essential values to be followed and incorporated by all its Employees, Administration and Third Parties when carrying out their activities.

As such, the Company remains committed to building a corporate culture based on mutual trust, respect among all and ethics, always aimed at guaranteeing a sustainable and a healthy environment in line with the principles of environmental, social and corporate governance (ESG). In this way, we understand that each member of the team contributes to the Company's longevity and integrity.

As such, Brava's Code of Ethics and Conduct describes the fundamental principles and rules that should guide the conduct of Employees of the Company and its subsidiaries, as well as individuals acting on behalf of, for the benefit of or in the interest of the Company.

We therefore encourage Brava's Employees and Third Parties of all hierarchical levels to become familiar with this Code and to refer to it as often as necessary during their activities.

In addition, we emphasize the importance of everyone reporting any violations of the applicable laws and Company rules to the Compliance Area, to contribute to the constant improvement of the Compliance System.

We are counting on everyone's commitment!

Décio Oddone / CEO Brava Energia

2 INTRODUCTION

Brava values ethics, transparency and respect for the rules and the applicable laws in all its activities, striving to fulfill its responsibilities and respect Employees, Third Parties, the society and the environment. This ethical commitment is set forth in the Code of Ethics and Conduct ("Code"), which establishes the guidelines and standards of behavior for all Employees and Third Parties who interact with the Company.

Brava expects all its Employees, including all officers, members of the Board of Directors, Advisory Committees and Fiscal Board, if established, and Third Parties to observe the rules contained in this Code and in its other related Compliance Policies. Thus, all Employees must read and expressly adhere to the provisions of this Code by means of the "Term of Adhesion and Commitment", which will be duly archived by the Company. Likewise, Third Parties who do business with Brava must also be made aware of the provisions of this Code and the Code of Ethics and Conduct for Suppliers.

Therefore, unethical, disrespectful conducts and, above all, that violate individual rights, human rights, current laws and/or internal rules are not tolerated. Anyone who engages in such conduct will be held accountable and subject to the disciplinary measures set out in this Code and other Company policies.

The Compliance Area plays a central role in reinforcing the Company's ethical culture, regularly raising awareness among its Employees of the Compliance Program through periodic communication and training actions and, therefore, it is the duty of every Brava Employee to attend and participate in the training sessions.

Therefore, everyone must repudiate any act that violates this Code and the applicable laws and report any suspicious acts contrary to those prescribed in the rules of the Company's Compliance Program.

3 APPLICATION AND SCOPE

This Code applies to all Employees, including officers, members of the Board of Directors, Advisory Committees and Fiscal Board, if established, and Third Parties who do business with the Company. It is expected that all will follow the rules set forth in this Code and in the other Company's compliance policies.

Brava ensures that the Code complies with Anti-Corruption Laws and national and international Compliance parameters. The Code must be applied jointly with the other compliance policies of the

Company and will be distributed to Employees and business partners as appropriate. It will also be publicly available on Brava's Investor Relations website to ensure accessibility and transparency.

4 COMPANY VALUES

The behaviors and decisions of each Employee and Third Party must always reflect the values adopted by the Company and must never jeopardize the financial, environmental, social and asset sustainability or the reputation of Brava Energia.

Therefore, it is extremely important that Brava's values are known, experienced and shared:

- (i) Safety;
- (ii) Ethics, Integrity and Credibility;
- (iii) Pragmatism and Results Orientation;
- (iv) Efficiency and Effectiveness;
- (v) Meritocracy and Spirit of Ownership.

5 ETHICAL CONDUCTS

5.1 Human Rights, Labor Relations, Harassment, Discrimination and Prejudice

Brava is fully committed to the principles contained in the United Nations' Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We believe that respecting human rights is an ethical obligation and an opportunity to transform people's lives. Respect for human rights must be guaranteed to Employees and all Third Parties who interact with Brava and is a constant commitment of the Company. To that end, the Company do not tolerate slavery, forced labor, child labor, human trafficking or any other violation of human rights.

Brava must always hire and promote its employees in an equitable manner, free from discrimination, with fair compensation and in compliance with labor laws. We respect everyone's physical and mental health and integrity, ensuring equal treatment, privacy, freedom of expression and other civil, social and cultural rights. The Company values diversity, promotes equal opportunities and ensures that relationships are respectful and courteous.

In addition, Brava does not tolerate acts of harassment, bullying, prejudice or any form of discrimination, whether based on physical or mental characteristics, ethnicity, race, gender, sexual orientation, language, religion, nationality, social class or political opinion.

We are committed to fighting any and all attempts to violate human rights and we will work vigorously to combat the sexual exploitation of children and teenagers, child labor, slave labor or similar situations.

Our commitment includes identifying and evaluating risks of human rights abuse and establishing mechanisms for promoting human rights:

- Elimination of child labor
- Elimination of forced and compulsory labor
- Combating discrimination in all its forms
- Valuing diversity
- Combating moral and sexual harassment
- Decent working conditions and respect for the freedom of association and the right to collective bargaining

5.1.1 Moral Harassment and Sexual Harassment

Brava does not tolerate situations that constitute moral harassment and/or sexual harassment. Acts of aggression, sexual provocation, or any type of harassment, whether moral or sexual, against Employees and Third Parties are unacceptable and prohibited conducts. Offensive or discriminatory messages will not be tolerated under any circumstances. The Company emphasizes that all Employees must be vigilant in combating them.

Under no circumstances will the Company tolerate physical punishment, repeated humiliation, threats of physical violence or physical or moral aggression, unauthorized deductions from salary that are not provided by law, lack of equal treatment and working conditions within the same team, retaliation against whistleblowers or any punishment that is considered vexatious.

In addition, any unwanted sexual approaches, requests for sexual favors or impertinent invitations, veiled or explicit threats of reprisal, blackmail, innuendo, inappropriate touching, unwanted sexual comments, or any behavior that embarrasses or violates anyone's sexual freedom will not be tolerated.

The Company is also committed to investigating and dealing with all cases of inappropriate behavior and moral or sexual harassment, and to taking preventive, corrective and disciplinary action, depending on the severity of the case. These actions are designed to support victims, prevent the

recurrence of harmful behavior, and eliminate any suggestion of permissiveness in the Company's organizational culture.

All Employees have a responsibility to contribute to an ethical and respectful working environment, in line with Brava's values. In this way, the Company expects everyone to contribute to creating a work environment that is totally free of harassment, avoiding attitudes that may be harmful, inappropriate behavior or that cause embarrassment.

5.1.2 Promoting Diversity and Inclusion

The Company believes that valuing diversity and people also constitutes ethical and responsible business conduct, contributing to business sustainability and innovation.

Brava values diversity in all forms and does not tolerate acts of discrimination, prejudice or violation of human rights, and upholds that diversity fosters engagement, diversity of ideas, experiences and cultures, valuing Employees and strengthening its reputation with stakeholders and the market in which operates.

The Company encourages its leaders and all Employees to value the presence and coexistence with diversity of gender, personal characteristics, habits, expressions and cultural traits of all Employees and Third Parties, and encourages a safe space for sharing ideas, experiences, knowledge, creativity and innovation for business challenges.

5.2 Respect for Life, Safety, Health, Environment and Communities

For Brava, Health, Safety and Environment ("HSE") are key pillars of its operations. Aspects that involve the preservation of life in all forms, whether they relate to Employees and Third Parties, the environment or even the Company's relationship communities, always come first.

All Employees and Third Parties must respect the rules and act in accordance with good practices, implementing actions that foster a culture of safety, environmental preservation and health, in accordance with the HSE policies. It is also important that everyone acts with the intent to always implement processes that prevent, reduce or mitigate risks to the safety and health of their Employees, contractors or the communities with which the Company interacts.

The Company's relationship with the communities in which it operates must comply with the current laws and be conducted respectfully, in accordance with best commercial and cultural practices.

Particularly in relation to its Third Parties, the Company has criteria and processes in place that go beyond legal compliance with respect to environmental, health and safety issues, always seeking to apply the best practices in the market and to fully comply with the Company's HSE requirements in all activities.

5.2.1 Health and Safety

Brava considers the safety, life and health of people to be of paramount importance in all the operations, offices and general public with which we interact. As such, we must follow safety procedures and standards to the letter, remain vigilant and disciplined, always be aware of risks, and look out for each other. We have an obligation to stop any activity if deviations or unsafe conditions are observed. We emphasize the importance of risk studies and the management of changes to keep risks from alterations in projects, integrity of wells, operations, procedures, standards, facilities, equipment or personnel within acceptable limits. Management of critical operational safety elements is continuously improved to prevent accidents and promote the health of all those involved in operations.

5.2.2 Drugs and Alcohol

Brava is a workplace free of drugs and alcohol. We do not tolerate any employee being under the influence of drugs or alcohol during their work activities. Please inform your manager and/or the Company's HSE team if you are taking prescribed medication that may impair your behavior or performance at work. To ensure a safe environment, Brava has the support of specific health promotion programs and guarantees compliance with applicable laws.

5.2.3 Respect for the Environment

Brava respects the environment and is committed to reducing and preventing the environmental impacts of its activities. As such, it develops actions to protect, preserve and mitigate the environmental impacts inherent in its activities. The Company has an Integrated Management System ("IMS"), with procedures that comply with the best industry practices and current laws.

The Company expects all Employees and Third Parties to: ***(i) act to prevent, control and mitigate environmental impacts; (ii) make other Employees, Third Parties and suppliers aware of respect for the environment; (iii) immediately report any incidents or potential environmental damage.***

5.3 Compliance with the Law

Brava is committed to complying with the laws, regulations and other standards applicable to the development of its activities. We adopt a zero-tolerance policy towards cases of fraud, bribery and corruption in all our businesses and activities. We expect Employees to respect and comply with local, state and federal laws and regulations, and to cooperate with any investigation or inspection by any Public Authorities or Officials, including Regulatory Agencies and National Financial System inspection bodies.

5.4 Interaction with Public Authorities

The Company may interact with Public Authorities in the performance of its activities. Such interactions must always be guided by ethics, transparency and professionalism, including during any inspections, when obtaining licenses or authorizations, meetings with government agencies and in public bidding processes, and any conduct that could constitute an illegal act is prohibited.

Actions aimed at frustrating or hindering the actions of the Public Authorities are forbidden and subject to the enforcement of the Anti-Corruption Law. Make sure you know the laws applicable to your work and, if in doubt, ask your manager, Legal and/or Compliance.

There are local and international regulations that establish serious penalties for the Company, its Employees and Third Parties in the event of illegal acts related to Public Officials. Inspections must always be accompanied by at least two Employees. It is forbidden to promise, offer or deliver, directly or indirectly, any advantage to Public Officials or to third parties appointed by them, for them to prevent, delay or omit actions necessary for carrying out inspections.

Therefore, it is important to emphasize the following duties of Employees and Third Parties acting on behalf of Brava:

- Read and understand the provisions of the Anti-Corruption Policy, the Code and the Manual for Relations with Public Officials in order to ensure that the Anti-Corruption Laws and rules of conduct are observed;
- Always act ethically, with transparency, reasonable manner and good faith in your activities, especially when interacting with Public Officials;
- Never interact alone with Public Officials, whether through face-to-face or virtual meetings and e-mails, and keep a record of all communication established. *Specific exceptions may be analyzed*

and approved in advance by the Executive Board and the Compliance Area, provided they are duly recorded;

- Conduct interactions exclusively through the Company's corporate contacts and the Public Authorities' official channels;
- Observe the specific rules on gifts, presents, entertainment and hospitality to Public Officials.

If you have any questions, please contact your immediate superior and/or the Compliance Area.

5.4.1 Participation in Public Bids

All Employees and Third Parties who participate in public bids on behalf of, for the benefit of or in the interest of the Company must strictly follow the rules and regulations of the bidding process and observe the provisions of Brava's Anti-Corruption Policy. Any undue interference in the course of the bidding process or in any documents related to the bidding process, such as bid notices and terms of reference, is prohibited.

Fraud in public bidding and contracting can subject offenders to serious sanctions, including of criminal nature.

5.4.2 Political Activities

The Company does not engage in or participate in political-party activities but respects the individuality of each person with respect to his or her opinions, provided they are expressed outside the work environment and are not linked to the Company.

In compliance with current electoral regulations, the Company does not make political or electoral donations and does not allow its Employees and Third Parties to do so in a manner linked to the Company's name, structure and resources. The Company's name, structures and resources may not be used to serve political interests or interests other than those of the Company.

5.5 Conflicts of interest

A Conflict of Interest occurs when an individual is faced with alternatives, possibilities or decisions in which the results of their actions could benefit them or a third party to the detriment of the interests of the Company or its subsidiaries.

Brava is committed to preventing and avoiding any and all situations that could be characterized as Conflicts of Interest and, therefore, understands that all Employees, including its administrators, must

aim to avoid them, promote transparency and implement appropriate mitigating measures. Therefore, everyone's attitude in their activities on behalf of the Company must be impartial, unbiased and transparent, with a focus on Brava's interests and without using their position to gain any type of improper advantage for themselves, Brava or Third Parties.

We recommend that all Employees be aware of and comply with the provisions described in the **Company's Conflict of Interest Standard**. These are the responsibilities of every Employee:

- The hiring of spouses, partners or relatives up to the third degree (great-grandparents, grandparents, parents, uncles, siblings, children, grandchildren, great-grandchildren, nephews) or affective relationships must be reported in a timely manner so that they can be evaluated by the Compliance Area and the Company will not allow, since the approval of this Policy, any case in which one of the parties has the power to hire, terminate or give a promotion to the other;
- Employees who have a personal or family relationship with Public Officials, whose function is related to the activities carried out by the Company, must not participate and/or influence others in decisions or negotiations related to potential conflicts;
- Situations involving Politically Exposed Persons (PEP) should be reported to the Compliance Area, which will conduct the necessary and appropriate due diligence on a case-by-case basis;
- There must be no negotiations and deliberations in which personal interests override and/or harm those of the Company;
- Employees must be careful never to speak on behalf of the Company in external activities that are not previously authorized by Brava;
- Everyone should take special care when offering and receiving gifts, presents, entertainment, hospitality, donations and sponsorships;
- Employees are prohibited from engaging in other professional activities that compete or conflict with the strategic affairs and/or business of the Company;
- Business with related parties must comply with current laws and the Related Parties Transaction Policy;
- No Employee, including any administrator, is allowed to make use of privileged information.

Employees must always report actual or potential conflicts of interest to the Compliance Area and their immediate supervisor in a transparent, timely and formal manner. In case of violations of these rules, the report may also be made through Brava's Whistleblowing Channel.

5.6 Relationships with suppliers, service providers and other Third Parties

Suppliers, service providers and business partners are fundamental to the Company and therefore all relationships must always be based on the principles of ethics, respect, transparency and compliance with the law.

Brava does not tolerate unethical practices, acts of corruption or discrimination, the use of drugs or consumption of alcoholic beverages during the performance of its activities, involvement in practices that violate human rights, or any other illegal act directly practiced by Third Parties associated with the Company.

Therefore, the Company expects everyone to comply with the provisions set in the Code of Ethics and Conduct for Suppliers, in this Code, in the Anti-Corruption Policy and in the applicable laws and regulations.

The Company's contracting is based on the best practices and integrity background of Third Parties, and therefore the Company has specific policies and procedures in place to analyze, classify and mitigate the risks of suppliers, service providers and business partners. In addition, Brava applies appropriate compliance and human rights clauses in all its contracts and disseminates the content of its main Compliance Program policies.

Employees who interact with Third Parties should be aware that agreements and contracts may be terminated for failure to comply with this Code, the Anti-Corruption Policy or any laws applicable to Brava.

The Company is concerned about, and therefore expects its suppliers, service providers and Third Parties to be committed and zealous about data protection and compliance with regulations regarding the privacy and protection of personal data, such as the General Data Protection Law and other relevant sector regulations.

5.7 Relations with the press and social media

We are committed to preserving Brava's image and reputation, as well as the well-being of our Employees. Brava recognizes the importance of the internet and social media **as a channel for communication and information** and upholds freedom of expression, with ethical and responsible conduct as a non-negotiable premise.

Therefore, you should avoid comments or content that are aggressive, hostile, discriminatory, hateful or offensive. We encourage you to participate in social media platforms in a responsible and conscious manner, always acting in good faith and posting using your personal name.

With regard to communications with the press, these must be carried out exclusively by the Officers and/or Managers appointed by the Company's Executive Board and **through the Communications Area**. Upon being contacted by the press, no Employee is authorized to provide information or clarifications on behalf of the Company, unless specifically designated to do so. In such cases, the press representative should be instructed to contact the **Communications Area and/or the press office**.

Every Employee is a spokesperson capable of expressing Brava's values in their direct relationships through digital channels. Before posting anything, ask yourself: "What will be the impact of this post?" or "Could my post be misinterpreted? Does it pose a risk to the activities or image of the Company and its Employees?".

5.8 Relationship with Competitors

The Company opposes any business strategy designed to: (i) limit, distort or in any way affect free competition or free enterprise; (ii) dominate the relevant market for goods or services; (iii) arbitrarily increase profits; or (iv) abuse a dominant position.

Brava and its Employees must be transparent in their interactions with competitors and the market in general, in direct contacts and in the context of public and private bids, trade associations and other business forums.

All information about the market and competitors may be obtained by Employees and Third Parties only through transparent and appropriate practices, without violating applicable laws and free competition.

5.9 Donations and Sponsorships

The Company supports philanthropic and cultural activities, provided they are legally authorized and conducted in good faith. Therefore, prior to making any donation or sponsorship, according to Brava's Donations and Sponsorships Procedure, the potential Beneficiary must undergo a prior Integrity Risk Assessment process to assess their background and any integrity risks to determine the appropriate recommendations.

All donations and sponsorships made by the Company must be formalized and properly recorded. Beneficiaries of donations must be made aware of the provisions of this Code and must agree to comply with its rules, otherwise the donation will be rejected.

The following donations and sponsorship are strictly prohibited:

- Directly to political parties or candidates for elective office in any sphere of power, as well as those of a political or electoral nature. Brava Employees and Third Parties are also prohibited from making any donations or sponsorships linked to the Company.
- For purposes other than those submitted for analysis by the Compliance Area and/or unrelated to the activities of the Beneficiary organizations.
- That are intended to obtain undue commercial, regulatory or other benefits for the Company.
- To entities (companies, public or private foundations, NGOs, OSCIPs) related to Public Officials or Third Parties directly or indirectly related to them, their spouses, partners or relatives up to the second degree of consanguinity or affinity, or who have a history of involvement in fraud and corruption.
- To any Beneficiary that does not share the same ethical values as the Company.

5.10 Gifts, presents and hospitalities

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

Payments for travel, hospitality or any other business-related expenses, such as lunches and dinners, as well as being reasonable, must be strictly related to a business conduct. The rules and values tolerated for the offering of gifts, which are items of no commercial value or of negligible value, and for presents, are described and detailed in the Gifts, Presents, Entertainment and Hospitality Procedure and must be observed by all Employees and Third Parties.

In the event of receiving gifts, presents or hospitality due to the position held or the activities carried out, the Employee must also consult the Anti-Corruption Policy, report the event and request guidance from the Compliance Area.

We must also make sure that the offer or receipt complies with any rules and policies applicable to the beneficiary of the item, as well as with local customs and practices.

Note that offering, giving or promising a gift, present or hospitality to a Public Official poses serious compliance risks to the Company, as it may be perceived as an undue advantage in exchange for an improper benefit. For this reason, it is prohibited to offer or accept gifts, presents or hospitality:

- 1) When Public Officials are involved, except for low-value promotional items that necessarily have the logo of the Company or public entity, such as pens, notebooks, diaries, calendars, key rings, etc;
- 2) When there is payment in cash or equivalent, such as gift vouchers;
- 3) When any item is offered, especially travel and meals, to people unrelated to the business relationship with Brava, such as family members and companions of the beneficiary;
- 4) When travel and hospitalities are offered with extravagant and luxurious items or that are unrelated to commercial and regulatory issues, such as travel and leisure;
- 5) When a hospitality (meals, lodging and travel) is not strictly related to the function of the Public Official or when it is not permitted by the entity to which the Public Official is related;
- 6) Just before, during or just after the performance of acts relevant to the Company, such as signing contracts and obtaining licenses essential to the Company's activities, except for low-value promotional items bearing the Company's or Public Authority's logo, such as pens, notebooks, diaries, calendars, key rings, etc.

5.11 Privileged Information and Insider Trading

Brava is committed to the protection of privileged information and the disclosing of relevant information in accordance with the law. In this regard, Brava expects everyone's commitment that they will never use privileged information for their own benefit or for the benefit of a third party, nor will they disclose such information to a third party.

The Company has a Trading Policy, whose purpose is to set out rules, procedures and guidelines to ensure compliance with good practices in the trading of Securities issued by the Company and to avoid inappropriate use of privileged information, according to the applicable laws. Therefore, if you have any questions, the Investor Relations Area will be available for queries related to the negotiation of Securities issued by the Company, via the electronic channel: ri@bravaenergia.com.

5.12 Mergers, acquisitions and other corporate operations

The Company ensures the transparency and security of the business associations it enters with Third Parties. All mergers, acquisitions and other corporate operations carried out by the Company must be conducted in compliance with the applicable laws and preceded by a due diligence led by Brava's

Legal Department, regarding the risks involved, as well as other assessments compatible with the complexity of the operation.

5.13 Preventing Money Laundering

Brava does not accept or tolerate practices that may constitute Money Laundering, which consists of mechanisms designed to conceal the illicit origin of funds and make their use appear legitimate. Money Laundering is a criminal activity aimed at covering up the illegal nature of values, assets and goods derived from previous criminal offences, such as corruption, terrorism, fraud, tax evasion and misdemeanors, for instance.

The Company fully complies with the applicable Anti-Money Laundering laws, notably the Brazilian Anti-Money Laundering Law (Federal Law 9.613/1998) and other Anti-Corruption Laws.

5.14 Treatment of Personal Data and Privacy

The information we produce in the course of our work is strategic to the Company. Therefore, it is the duty of every Employee to carry out his or her duties ethically and with a commitment to the confidentiality required for sensitive matters, and the unauthorized disclosure of any strategic information, confidential documents or personal data is prohibited.

In addition, Brava is committed to complying with the Brazilian General Data Protection Act (LGPD) and to respecting the privacy of all individuals with whom it does business. Personal information is any information that can identify an individual, such as the Tax ID, address, license plate number, Internet Protocol (IP) address, geolocation, among others.

Brava believes that everyone has the right to control their own personal data. Therefore, respect for privacy and transparency in the treatment of this data are priorities for Brava. Therefore, we emphasize the importance of all Employees following the rules and procedures on personal data, as well as those related to information security. We must only collect, use, disclose, retain or process personal data that is necessary to comply with the Company's requirements, as permitted by law in the locations where we operate.

In addition, you should be careful when accessing or sharing company documents, systems or files that may contain personal information.

The disclosure, sharing or improper treatment of personal data is prohibited. We are all responsible for complying with the LGPD, as well as the internal Data Protection regulations. The main precautions and obligations of all Employees are:

- Comply with Brava's information security rules;
- Pay attention to password policies, i.e. never share personal passwords with other Employees or unauthorized Third Parties;
- When carrying out work activities and meetings away from the office or your base, take care to ensure the necessary privacy and confidentiality;
- Do not use Brava information and content for private use or any other use than the Company's objectives and assets, without proper approval;
- Only share confidential, restricted and internal business information with authorized individuals when it is in Brava's best interest to do so;
- Preferably share corporate information after it has been made public through the appropriate Brava institutional channels;
- Observe the LGPD, comply with internal regulations regarding the protection of personal data and respect people's privacy;
- In the event of an alleged violation of the LGPD and internal regulations, please contact the DPO (Data Protection Officer) via the official channel (dpo@bravaenergia.com).

5.15 Cybersecurity

All Company equipment, software and data, including data stored on personal or corporate devices, are Brava's property. The protection of our technology systems is the responsibility of all Employees and anyone conducting business on behalf of Brava. Misuse of technology or information can expose the Company to risks, including virus attacks, security breaches, theft or loss of assets, or reputational damage.

6 RECORDS OF FINANCIAL AND ACCOUNTING STATEMENTS

The Finance Department is responsible for implementing adequate internal controls to ensure the reliability of accounting records and the prompt drafting of reports and financial statements. The Company's transactions are fully documented, accounted for, and classified transparently in accounts that reflect their nature, in accordance with applicable laws and internal procedures. The Company's financial statements are audited quarterly by an independent external auditor under the supervision of the Audit Committee to ensure the quality and integrity of the financial statements.

7 REPORTING CHANNEL AND GUARANTEES OF PROTECTION FOR WHISTLEBLOWERS – CONFIDENTIALITY AND NON-RETALIATION

The Company encourages and supports the reporting of any violation or suspected violation of this Code, the Company's Policies and applicable laws through the Whistleblowing Channel, which can be accessed, free of charge, through the following channels:

- Website: <https://www.contatoseguro.com.br/bravaenergia>
- Telephone: 0800 810 8543

Reports can be made anonymously, if desired, and the Company guarantees, to the extent permitted by law, total secrecy and confidentiality in the investigation of the facts. The members of the Compliance Area and the Ethics and Integrity Committee involved in investigating complaints must always ensure confidentiality of the treatment of complaints received, to avoid the leakage of information and the undue exposure of people mentioned in the complaints or involved in the investigation process.

We also point out that false accusations or untruthful information with the potential to harm people constitute violations of this Code and will be subject to disciplinary measures.

In addition, the Company prohibits any kind of retaliation against Employees or Third Parties who make reports in good faith, as well as those involved in investigating the reports. Non-retaliation is a basic principle for the Company and one of the main bases that effectively guide the operation and credibility of our Whistleblowing Channel. The non-retaliation policy is therefore a guarantee from Brava to the whistleblower that they will not suffer any retaliation and can therefore feel safe in making a complaint.

7.1 Disciplinary measures and monitoring

Employees and Third Parties may be held personally liable for unlawful or improper acts committed in the performance of their activities on behalf of the Company. Violations of the provisions of this Code or other Company policies may be subject to investigation and disciplinary action:

- Oral warning;
- Written warning with a note in the employee's file;
- Suspension for up to 30 (thirty) calendar days, if applicable;
- Dismissal without cause;

- Dismissal with cause;
- Fines and termination of contracts with Third Parties; and
- Where appropriate, reporting to the relevant authorities.

Independently of these measures, the Company may adopt actions necessary to interrupt the irregularities detected. Examples of such actions are the temporary suspension of Employees and/or Administrators, suspension of employment contracts and suspension of contracts with Third Parties and their respective payments.

If Brava is held liable or suffers damage because of acts committed by its Employees or Third Parties, the Company reserves the right to seek recourse against those responsible.

Based on its commitment to prevent and remedy situations that violate its Compliance Program, the Company may access and monitor the corporate devices made available to its Employees for professional purposes.

8 RESPONSABILITIES OF THE COMPLIANCE AREA, THE ETHICS AND INTEGRITY COMMITTEE AND THE MANAGEMENT OF BRAVA

The Compliance Area and the Ethics and Integrity Committee are responsible for the Company's integrity issues and have full autonomy and independence to carry out their duties, reporting to the Company's Board of Directors and to the Chief Executive Officer. In this way, the Company guarantees that:

- Its activities will be carried out with trained human resources, with the necessary and adequate material and financial resources and with direct access to the Company's Management and to the information necessary for the development of its activities;
- The role of Compliance Officer and the Ethics and Integrity Committee shall always be entrusted to persons with an unblemished reputation and adequate qualifications to carry out their duties;
- Brava's Management will fully support the Compliance Area and the ethics and integrity committee, which have independence, responsibility and authority for the effective implementation of the compliance program; and
- The necessary measures will be taken to maintain the independence and appropriate authority of those involved in investigating possible irregularities by any Employee.

In carrying out its duties, the Compliance Area is responsible for:

- Promoting the Compliance Program's training and communication of this Code and other compliance policies;
- Assessing the adequacy and effectiveness of the Compliance Program's policies and controls;
- Enforcing compliance rules and policies applicable to the Company;
- Ensure that the actions of the Compliance Program are communicated and reported to the Board of Directors;
- Receiving, assessing and handling complaints received through the Whistleblowing Channel, as well as conducting internal investigations, monitoring and supervising their progress, jointly with the Ethics and Integrity Committee and reporting to the Audit Committee;
- Reviewing this Code and the Company's other compliance policies and proposing changes and adjustments to the Policies, whenever necessary, in accordance with the law and best market practices, in order to proactively minimize risks and non-compliance;
- Keeping the Integrity Risk Matrix up to date;
- Keeping the Company's Management updated on the activities, indicators and results of the Compliance Program, as well as its main conclusions, recommendations and necessary measures;
- Recommending and supporting the implementation of best governance practices and monitoring the activities of the Company's internal audit and internal controls;
- Promote the drafting and approval of the Company's policies, regulations, rules for the distribution of powers and authority and the main Governance and Compliance procedures.

The Ethics and Integrity Committee, regarding the responsibilities related to the Compliance Program, must:

- Assist the Compliance Area in the implementation of the Compliance Program and its activities;
- Propose the review of issues related to best practices in ethics and governance;
- Assist, as appropriate, in the assessment and handling of complaints and report to the Audit Committee;
- Decide on recommendations for disciplinary measures.

The Company's Management, regarding the responsibilities related to the Compliance Program, must:

- Visibly and unequivocally support, promote and monitor the implementation of the Compliance Program, including related regulations and risks;
- Promote the dissemination of the Company's culture and values of ethics and integrity;
- Provide adequate resources so that the necessary measures can be implemented;

- Ensure the independence and authority of the Compliance and Governance Area.

In case of doubt or for further clarification, the Compliance Area can be contacted by e-mail at compliance@bravaenergia.com.

9 ANNEXES

ANX-01-XX-XXXX-XXXX-001 – Title of annex 1.

ANX-02-XX-XXXX-XXXX-002 – Title of annex 2.

ANX-03-XX-XXXX-XXXX-003 – Title of annex 3.

10 REVIEW TABLE

REVIEW	DATE	DESCRIPTION OF THE REVIEW
00	mm/dd/yyyy	Initial Issue
01	mm/dd/yyyy	Cover updated and degree of secrecy added. General revision.
02	09/11/2024	Updating the Company's layout and logo