



Supplier Code of Conduct



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1. Overview

This guide aims to inform Eletrobras suppliers about the standard to be adopted for the supply of materials and the provision of services. It defines their duties and responsibilities clearly and objectively, and also highlights important instructions on the hiring process.

This guide applies to individuals and companies that maintain a business relationship with Eletrobras and advises them to adopt an ethical attitude that is compatible with the principles, values, and norms in favor of citizenship and human development, aiming at a more just, sustainable and solidary society.

2. Sustainability and Integrity

Eletrobras is a company committed to the promotion of national sustainable development, as well as the dissemination of ethical and integrity principles throughout its value chain.

According to the [Supply Logistics Policy of Petrobras Companies](#), in the hiring and work processes of the supply chain, it is required to adopt measures that help achieve the Sustainable Development Goals (SDGs) of the 2030 Agenda of the United Nations (UN). For more information, click [here](#).

In hiring, aspects such as sustainability, corporate integrity, human rights, and the environment will be taken into account according to guidelines set out by the company. In this manner, the supplier must know and comply with the policies of Eletrobras companies available on the company's website (click [here](#)), where applicable. We call special attention to the following:

- Supply Logistics Policy;
- Sustainability Policy;
- Integrity Program (Compliance);
- Social Responsibility Policy;
- Environmental Policy.



3. Our Expectations of Supplies

3.1 Eletrobras guidelines and rules of conduct for suppliers of goods and services

- In hiring, suppliers must comply with the environmental, social and economic aspects, adopting measures that help achieve the Sustainable Development Goals (SDGs) of the UN 2030 Agenda.
- Suppliers must follow and respect the guidelines and rules of conduct set out in this guide, and take actions to ensure that they are also respected in their supply chains.
- Allow due diligence and other measures aimed at risk management and monitoring in terms of sustainability and corporate integrity.
- Respect and be in good standing regarding tax legislation.
- Fully meet the requirements of the contract.
- Keep a good relationship with Eletrobras, with no history of administrative sanctions (warnings, fines, etc.).
- Keep the payroll up to date and establish a good policy of benefits for employees, considering the practices provided in the next items of this document.
- Assume responsibility for damage caused by your employees or agents to the property owned by Eletrobras or third parties operating on Eletrobras' premises.
- Ensure that employees and agents are subject to Eletrobras' safety regulations, while on Eletrobras' premises.
- Guide your employees to respect the principles and conduct commitments outlined in this guide.

3.2 Privacy and Information Security



- Ensure the security of Eletrobras' data and information, and only disclose them with the company's express consent.

3.3 Anti-Corruption Practices

- Know and comply with, where applicable, the Code of Ethical Conduct and Integrity and the Integrity Program (Compliance) of the Eletrobras companies, available on the company's [website](#).
- Recognize if there is or there will be access to privileged information or advantages that may compromise the honesty or legal equality of the hiring process, and should it be the case, withdraw from participating in the process.
- Allow early checks (due diligence) and measures aimed at monitoring Eletrobras contractors, agreeing to update the information provided at the time of hiring, in case of any material change that could damage their integrity.
- Offer quality products and services, not using or purchasing products of illegal origin.
- The supplier, their employees, agents, and managers shall not:
 - ✓ Promise, offer or give, directly or indirectly, any undue advantage to a public official or anyone else, or a third party in connection with such public official;
 - ✓ Offer an advantage of any kind to Eletrobras employees or pay their expenses;
 - ✓ Prevent or defraud, by an arrangement, negotiation or any other expedient, the competition of a public bidding procedure;
 - ✓ Hinder, disturb or defraud the performance of any act of public bidding procedure;
 - ✓ Remove or seek to remove a bidder, due to fraud or by offering an advantage of any kind;
 - ✓ Defraud public bidding or the contract resulting from it;



- ✓ Establish, fraudulently or irregularly, a legal entity to participate in a public bidding process or being awarded the contract;
- ✓ Do any actions or omissions that constitute an illegal or corrupt practice, under Law No. 12,846/2013, of August 1, 2012, regulated by Decree No. 8,420/2015, of March 18, 2015, of the US Foreign Corrupt Practices Act of 1977, or any other applicable anti-corruption laws or regulations.

The commission of any act of fraud, corruption, and embezzlement may involve the following measures:

- (I) unilateral termination of contract;
- (II) imposition of contractual fines;
- (III) filing of an administrative complaint; and
- (IV) informing the competent authorities.

3.4 Human Rights Practices

- Do not use slave/forced labor or involuntary labor of prisoners in your production chain.
- Do not employ child labor in your production chain, except as an apprentice, from age 14 and up.
- Do not commit the trafficking of human beings in your processes and/or production chain.
- Do not admit the sexual exploitation of children and adolescents in your processes and/or production chain.
- Ensure decent conditions for workers, including those of subcontractors, regarding the workplace, transportation, accommodation, food, hygiene, and other related matters.
- Do not admit discrimination by color/race, marital status, physical and cognitive condition, age, religion, sex, social class, or of any other kind.
- Respect and value diversity, ensuring equal treatment, rejecting prejudice and discrimination based on gender, sexual orientation, ethnicity, race, creed, or any other.



- Eliminate all forms of threat, coercion, and physical, verbal, or psychological violence, making clear the prohibition on moral and sexual harassment.
- Effectively allow employees to exercise the right of freedom of assembly and association.

3.5 Environmental Practices

- Act in compliance with current environmental legislation.
- Prioritize the use of recycled, recyclable goods and materials with less environmental impact, based on the analysis of their life cycle.
- Promote the efficient and rational use of natural resources in your activities, minimizing the emission of pollutants and greenhouse gases.
- Have all the licenses, permits, and environmental registrations necessary for your activities, duly updated, and meet all requirements.
- Properly store and dispose of generated waste, giving proof of the correct disposal, in compliance with current legislation. When applicable, elaborate a Solid Waste Management Plan (SWMP) and keep it up to date regarding your activities.
- Define, whenever possible, environmental guidelines for suppliers, considering environmental aspects in the value chain and the partnerships made.

3.6 Health and Occupational Safety Labor Practices

- There must be compliance with the technical, health, hygiene and work safety standards defined by the regulatory rules of the Special Secretariat for Social Security and Labor of the Ministry of Economy.
- Employees must receive the safety equipment necessary to perform services and inspect the use, in particular, as stated in the regulatory rules of the Special Secretariat for Social Security and Labor of the Ministry of Economy.
- The annual Environmental Risk Prevention Program (PPRA) must be developed and implemented, according to the regulatory rules of the



Special Secretariat for Social Security and Labor of the Ministry of Economy.

- The annual Occupational Health Medical Control Program (PCMSO) should be developed and implemented, aiming to promote and preserve the health of employees, according to the regulatory rules of the Special Secretariat for Social Security and Labor of the Ministry of Economy.
- Outsourced employees must receive guidance and get familiar with socio-environmental responsibility policies, when applicable.
- Fundamental constitutional rights must be guaranteed, such as the dignity of the human person, the social function of work, the reduction of risks inherent in work, the admission of workers with physical or intellectual disabilities, and the promotion of gender equality, as follows:
 - ✓ When relevant, jobs must be made available for rehabilitated Social Security beneficiaries or qualified disabled person, according to current legislation;
 - ✓ The company providing outsourced services must offer the benefit of meal allowance to its employees, without any percentage deduction of this amount from salary, and also define minimum amounts, conditioned to the reasons presented by the technical area, duly supported by a price survey carried out in the surroundings of the workplace and by a recognized entity, taking into account the average amount paid by the bodies and entities of the government and private initiative for the benefit in question;
 - ✓ The company providing the service must offer the transportation voucher to its employees, according to current legislation, considering the commuting from home to work and work to home, regardless of the number of tickets required for the employee to commute;
 - ✓ The company providing outsourced services must offer a medical, hospital and dental assistance plan to its employees, and it may:
 - ✓ be a recognized plan or insurance for corporate collective health care, according to specific legislation and regulations, of the National Health Agency (ANS), covering hospitalization, outpatient care, consultations and clinical examinations;
 - ✓ The company providing outsourced services must cover procedures related to accidents at work and their consequences, occupational diseases and other procedures related to occupational health;



- ✓ Gender equity must be promoted among outsourced employees;
- ✓ The company providing outsourced services must also comply with the collective agreements and conventions for the professional categories of the contract when granting the benefits.
- Comply with the regulatory rules of the Special Secretariat for Social Security and Labor of the Ministry of Economy relevant for each hired category.
- Provide first aid materials, when applicable, as determined by Eletrobras' occupational health area.
- Give proof of the admission, periodical, return to work and dismissal medical exams, according to the activity, age group and gender of the employees of the service provider company, in addition to the specific exams for each activity, under the legislation.
- Provide drinking water, uniform, transportation, sanitary conditions in workplaces, bathrooms, kitchens, bedrooms, camps, changing rooms and other temporary or permanent facilities, when applicable.
- Provide shelters and measures to protect employees from bad weather, when applicable.

4. Duties of the Eletrobras Companies and their Staff towards the relationship with Suppliers

- Select and hire suppliers and service providers based on legal, technical criteria of quality, cost, and punctuality, requiring in these contractual relationships the commitment to ethics, corporate integrity, corporate sustainability, and respect for human rights.
- Refuse unfair competition practices, child labor, sexual abuse and exploitation of children and adolescents, forced or degrading labor, as well as any and all forms of physical, sexual, moral or psychological violence and other practices contrary to the principles of the Code of Ethics and Conduct, the Integrity Program and the policies of Eletrobras companies, including in the supply chain of their suppliers, and denounce violators.



- Do not participate in any type of negotiation that may result in personal or third party advantages or benefits, which characterize a real or apparent conflict of interest for the employees involved, of either party, in accordance with the provisions of the Integrity Program (Compliance) and the policies of Eletrobras companies.
- Do not provide any favor or remunerated service to suppliers and service providers with whom you maintain relations due to your activities in the company, according to the provisions of the Integrity Program (Compliance) and the policies of Eletrobras companies.
- Treat with respect, cordiality and according to the principles of the Code of Ethical Conduct and Integrity of Eletrobras companies, as well as employees of suppliers and service providers.
- Discourage contractual provisions that attack or minimize the dignity, quality of life and social welfare of third-party employees.
- Offer quality products and services, aiming at the full satisfaction of customers and consumers, for the maintenance of long-lasting relationships with transparent and permanent dialogue.
- Establish and keep a relationship and communication with customers, suppliers, service providers and other partners according to the ethical principles defined in the Code of Ethical Conduct and Integrity of Eletrobras companies, in the Integrity Program (Compliance) of the
- Eletrobras companies and in the policies of Eletrobras companies, offering equal treatment to all, avoiding any privileges, discrimination and all forms of corruption and fraud.
- Preserve and treat with secrecy the registration data and information of customers, suppliers, service providers and other partners, obtained as a result of the business relationship.
- Do not make recommendations to customers, even if requested by them, of service providers or suppliers, keeping communication in a strictly professional manner.
- Do not accept or offer gifts, gratuities or advantages, even if in the form of preferential treatment by or for customers, suppliers, service providers and other partners related to the business or interests of Eletrobras



companies, according to the provisions of the Integrity Program (Compliance) and the policies of Eletrobras companies.

- Adopt early checks (due diligence) before hiring and measures aimed at supervising hired third parties, especially in situations with a profile of high risk to integrity. Such checks and measures include, but are not limited to:
 - ✓ certification that there are no impediments to hiring;
 - ✓ verification of information about the partners, directors and administrators of the bidding companies;
 - ✓ insertion, in the administrative contract, of clauses requiring: (I) commitment to integrity in public-private relationships and Eletrobras' guidelines and policies, including the expected application of its Anti-Corruption Program, mainly concerning the prohibition of fraud and corruption practices; (II) contractual termination if the contracted party acts in a harmful manner to the government, either national or foreign; and (III) indemnities in cases of breach of contract;
 - ✓ provision for determining the degree of risk of the contract to exercise adequate supervision;
 - ✓ periodic verification of whether the third party is acting in a manner that is consistent with what has been agreed in the contract, if its behavior is not contrary to its values, and if it does not incur any illegalities that may lead to accountability.

See the [Code of Ethical Conduct and Integrity of Eletrobras Companies](#) in full.

5. Complaint Channels

You can contact the Ombudsman's Office of Eletrobras by leaving a message on the Eletrobras' Website, phone +55 (21) 2514-4526/5895, or mail to Rua da Quitanda, 196/4º andar - Centro - Rio de Janeiro/RJ - CEP: 20091-005. You can also contact us in person, at the same address. Total secrecy, confidentiality and institutional protection will be guaranteed to those who use this channel.

Click [here](#) for information on the Ombudsman's Office of Eletrobras.



6. How Eletrobras Hires

Eletrobras' hiring process happens through bidding or direct contracting, under the terms of the applicable legislation. The rules adopted by the company are established in the [Eletrobras' Bids and Contract Regulations](#).

A bidding process is the formal administrative procedure in which the government, under conditions defined in the specific act

(Call Notice), invites companies interested in presenting proposals for the supply of goods and services.

The contracts that will be awarded by Eletrobras, through the bidding process, are all previously disclosed on the company's website and are available for consultation by interested parties through this [link](#). The bid notices contain all the information and procedures necessary for suppliers to participate in Eletrobras procurement processes.

Direct hiring is the one carried out without bidding, in exceptional situations expressly provided for in the current legislation, where bidding is waived or unenforceable.

7. Management and Monitoring

Eletrobras understands that it is essential to know, manage, and monitor all the elements able to impact its supply chain. For this purpose, the company has an established process to identify and classify critical suppliers.

A **critical supplier** is one who supplies inputs and provides essential services for the company's core activity. However, other features also define a supplier's criticality, such as:

- ✓ being unique or exclusive;
- ✓ directly impacting the final quality of products and services;
- ✓ having access to information or a critical process;
- ✓ being hired for large amounts;
- ✓ showing a high probability of risks and negative impacts related to the environment, human rights, occupational health, and safety;
- ✓ presenting a high risk to corporate integrity (for example, fraud or corruption, etc.).



The **process of identifying critical suppliers** of the company is carried out through an analysis based on the criteria established in the definition. All hired suppliers are entered in a tool called the criticality matrix, which automatically generates a classification (high, medium and low) according to the score obtained.

Critical suppliers are submitted to the due diligence process and, according to the results of the analyzes, monitoring and development actions are applied.

The supplier is monitored during the entire relationship with Eletrobras in several aspects, of which we highlight:

- ✓ legal compliance;
- ✓ economic and financial evaluation;
- ✓ technical qualification;
- ✓ compliance with the established technical specifications;
- ✓ management and inspection (internal monitoring) of the administrative and technical aspects of contractual execution;
- ✓ due diligence for critical suppliers (sustainability, human rights and integrity).

The applicable measures, if non-conformity is found, are contained in the contract, to which the supplier has access before signing the contract, on time to enable the analysis, negotiation, and elaboration of the proposal for bid. Therefore, by signing the contract, the supplier agrees to the established terms.

8. Registration

The registration of suppliers aims at registering and monitoring in advance the suppliers of materials and services demanded by Eletrobras.

Entering the Eletrobras registration to obtain register makes it easier for the supplier to participate in the bids, dispensing with the presentation of several qualification documents, which will already be duly registered in the computerized system.

Registration is available to any natural or legal person, regardless of where they are domiciled or headquartered, provided that they fully satisfy the registration conditions, by submitting the documents required by Eletrobras.



Instructions for making the registration of suppliers at Eletrobras are available on the company's website, in [Suppliers](#).

9. Certificates of Technical Capacity

The issue of a Certificate of Technical Capacity by the ELETROBRAS companies has the purpose of proving the supply and/or services provided by a supplier, as well as its performance.

The certificate issued must specify the content of the contract and data of the hired company.

The Certificate of Technical Capacity will be issued after the conclusion of the contract or, in the case of the provision of continuous services, if at least one year has elapsed from the effective date, except if it has been signed to be executed in a shorter period.

To request the certificate of technical capacity, the supplier must email us at: relacionamento.fornecedores@eletrobras.com, and send us the following information:

- the bidder's details;
- description of the provided material or service;
- identification of the contract or purchase order.

10. Final Considerations

Eletrobras suppliers will have specific clauses in their contracts, partnerships, covenants, terms or agreements, according to the kind of business, stating that they agree to respect, comply with and enforce, as applicable, this Guide of Conduct for Suppliers, the Code of Ethical Conduct and Integrity of Eletrobras companies, the corporate Integrity Program (Compliance), and Eletrobras policies. Likewise, suppliers must strive to ensure that the guidelines contained in said documents are respected in their supply chains.

This Guide of Conduct is valid indefinitely; however, Eletrobras agrees to evaluate and periodically review its contents and practices, within terms to be defined in the course of its dissemination.



Failure to comply with any of the ethical principles or commitments described in this conduct guide, determined by the committee responsible for ethical matters, may result in disciplinary measures, without prejudice to the adoption of administrative and/or judicial measures, when dealing with contractual and/or legal infractions.

All normative documents mentioned in this code are available in this [link](#).

Superintendence of Supply and
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