



# Booklet of **Code of Ethics and Conduct**





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# OUR WAY OF BEING

## **Purpose**

Generate value by providing excellent services in a sustainable manner, contributing to a safe energy matrix.

## **Mission**

Providing excellent services and innovative solutions, safely, for the energy sector, developing high-performance teams, building relationships of trust and exceeding expectations.

## **Vision**

To be a company in constant evolution, committed to the highest standards of safety, performance and sustainability, through innovation and valuing people, maximizing value for stakeholders.

## **Our values**

Safety  
Confidence  
Excellence  
Sustainability

# WE TRAIN PROTAGONIST LEADERS

Those people who inspire, engage, spread our corporate culture wherever they go and cultivate trust in relationships are the leaders Constellation wants.

 CHAT



**Juliana:** Guys, I've got a challenge! My team is unmotivated and I feel like I'm not getting people involved...

**Ricardo:** Have you tried to understand what's wrong? Sometimes small changes in the way we communicate make all the difference in creating a positive environment.

**Mariana:** It's true! I tend to give the team more space to suggest ideas and make decisions. This strengthens collaboration and innovation. When they feel they are part of something bigger, engagement grows a lot!

**Juliana:** Nice! I think I need to improve that. I always end up sorting things out on my own.

**Ricardo:** But leadership isn't about doing everything yourself! It's about inspiring and empowering.

**Mariana:** Yes! And a protagonist leader shows by example. If we practice Constellation's values on a daily basis, the team follows along and strives for excellence naturally.

**Juliana:** It makes sense... I'm going to listen more, trust more and bring the team closer. I want to motivate everyone to grow together! Thanks, guys!

**Ricardo:** We're together, Ju! Leadership is a daily construction. Let's grow together!

# HUMAN FACTORS MATTERS

- Trust is the basis of our relationships;
- Mistakes are opportunities to learn and improve;
- People are the solution;
- Context influences behavior and performance;
- How we respond to failures matters.

**CHAT**

**Carlos:** Guys, I have to tell you... I made a mistake in the report I sent to the client. I've only just realized!

**Ana:** Wow! But calm down, have you warned anyone?

**Carlos:** Not yet... I'm afraid of the boss's reaction.

**Marcos:** Man, we learn from our mistakes here. The most important thing is to act quickly and transparently.

**Ana:** Exactly! The worst thing would be to try to hide it. Trust is everything!

**Carlos:** You're right... I'll talk to him now and suggest a correction.

**Marcos:** Yes! The mistake has already happened, what matters now is how you deal with it.

**Ana:** That's it! And you can count on us to adjust whatever you need to. Together, we always find the solution.

**Carlos:** Thanks, guys! I'm calmer now.

# TAKE CARE OF YOURSELF AND THOSE AROUND YOU

- Promote an environment of psychological safety;
- Be aware of the risks;
- Use Personal Protective Equipment (PPE);
- Preserve your mental health;
- Follow the protocols and procedures;
- Do not use or be under the influence of alcohol or drugs while at work;
- Do not threaten, vandalize or sabotage the work environment, your colleagues or our structures and equipment;
- Don't put your life or the lives of your colleagues at risk.

 CHAT



**Rafa:** Guys, João has been acting strange lately... He's always exhausted, a bit disconnected. I think he's overloaded.

**Camila:** I get it too! Last week, he said he had a headache every day and trouble sleeping.

**Lucas:** That can be heavy stress! We need to support him. Here at Constellation, we look after each other.

**Rafa:** Yes! I'll call him for a coffee and see if he wants to talk.

**Camila:** Yes! And if necessary, we can suggest that they seek help from HR or the medical field. Mental health is a serious matter.

**Lucas:** Absolutely! A safe environment goes beyond the physical. And speaking of care, you can put on your PPE now, because I've already approved that PT (Work Permit).

**Camila:** It's true! Safety first!

**Rafa:** That's it! No one is left alone here. Let's take care of João and everyone around us.

# RESPECT IS ESSENTIAL TO OUR RELATIONSHIPS - HUMAN RIGHTS ARE NON-NEGOTIABLE

## WHAT **DON'T** TOLERATE:

- Moral and sexual harassment;
- Sexual harassment;
- Bullying and inappropriate behavior;
- Discrimination (prejudice against women, LGBTQIA+ people, people with disabilities, race/ethnicity, religion, age, among others).



# SAY NO TO HARASSMENT!

Elements that characterize **MORAL HARASSMENT:**

- 1. Repetition** (habitual actions of humiliation, embarrassment);
- 2. Directionality** (needs to be directed at a specific person or group);
- 3. Intentionality** (the harasser must want to have a negative impact on the harassed);
- 4. Temporality** (duration in time).

Bullying doesn't have to be explicit, through shouting and cursing, but it can occur covertly, through excluding people, constant jokes, etc.

What's more, you don't need hierarchy or power. Anyone can be a harasser, not just bosses or leaders!

 **CHAT**



**Mariana:** Guys, I'm worried about Julia... Have you noticed that the team's staff have been neglecting her?

**Ricardo:** Yes... Whenever she says something in the meeting, they joke or ignore it. And at lunch, they don't even ask her to sit with them.

**Bruna:** It's been going on for a while, hasn't it? At first I thought it was a joke, but now it seems to be on purpose.

**Mariana:** That's right! This could be bullying. Excluding someone, ridiculing what they say, creating a hostile environment... All this greatly affects a person's mental health.

**Ricardo:** And the worst part is that it comes from their own colleagues.

**Bruna:** Exactly! Bullying can come from anyone. We need to put a stop to this.

**Mariana:** I agree! I'll talk to Júlia and also report back to the Compliance team. You can't pretend that nothing is happening.

**Ricardo:** Yes! Here we build an atmosphere of respect. If something is wrong, we don't keep quiet.

**Bruna:** That's right! Bullying has no place here.

Not everything is bullying! It is important to distinguish bullying from work conflicts and negative feedbacks.

Conflicts are part of human and working relationships. Therefore, not every situation of friction or disagreement constitutes bullying. It's important to point out the differences so as not to make an undue accusation.

Let's look at some of the main differences:

#### CONFLICT:

- Clear and open divergence of ideas;
- Direct and frank communication;
- There is no change in the organizational climate;
- Direct interaction between agents;
- Possible confrontation;
- Does not seek to distance himself from the person he disagrees with.

#### HARASSMENT:

- Implicit divergence;
- Covert communication;
- Troubled organizational climate;
- Isolation of one or more people;
- Objective, habitual and persistent stalking;
- Repeated and intentional confrontation.

#### CHAT



**Paulo:** Guys, Ricardo hit me hard today. He said that my report was full of mistakes and that I needed to be more attentive. Isn't that bullying?

**Carla:** It depends... Did he disrespect you, humiliate you or do it in front of everyone?

**Paulo:** No... It was just a meeting with the team and he explained what needed improving, but I found it a bit harsh.

**Lucas:** From what you've said, it sounds more like feedback than harassment. Bullying happens when there is repetition, intent to humiliate and persecution.

**Carla:** Exactly! Feedback can be negative, but it is necessary for our growth. If it were constant, with offenses or isolation, then it would be a question of bullying.

**Paulo:** It makes sense... I think I got defensive because I made a bad mistake in the report.

**Lucas:** That's normal! But if you feel that something is wrong or that you are being treated unfairly on a regular basis, you can seek help.

**Carla:** That's it! The important thing is to differentiate between day-to-day conflicts and harassment and to ensure that our working environment is always respectful.

**Paulo:** Thanks, guys! I'll see it as a learning experience.

**INAPPROPRIATE BEHAVIOR** are actions (comments or attitudes) that embarrass another person on a sporadic basis. They are harmful and detrimental to the organizational climate and work environment.

Examples: swearing, inappropriate jokes, rudeness, among others.

These types of comments or attitudes are not, in principle, bullying. But they can be transformed if they occur frequently and intentionally.

## CHAT



**Camila:** Guys, Eduardo was super rude to me at the meeting today. He said my idea was "ridiculous" and laughed in front of everyone.

**Fernanda:** Wow, what a bummer! Does he do it all the time or was it a one-off?

**Camila:** It was the first time with me, but I've seen him speak rudely to other people.

**Lucas:** This is inappropriate behavior! Name-calling, offensive jokes and rudeness are not part of a healthy environment.

**Fernanda:** Yes! It was an isolated episode, but if it starts to happen frequently and intentionally, it could turn into something more serious.

**Camila:** And how should I act?

**Lucas:** First, try to talk to him and make it clear that this has bothered you. If it happens again, it's worth reporting it to HR or Compliance.

**Fernanda:** That's right! Respect must come from everyone, and we have to take a stand against attitudes that harm our working environment.

**Camila:** Thanks, guys! I won't let it go on.

Other issues we need to bring up here are related to **sexual harassment and other sexual violence**, which, are crimes!

**SEXUAL HARASSMENT**, unlike bullying, needs hierarchy and the exercise of power in order to exist.

These are common signs of the person who is being harassed: feeling trapped and unable to ask for help, because they are afraid of losing their job if they don't give in.

Sexual harassment is a crime that doesn't even require physical contact. It can happen via cell phone messages and social networks, for example. And it only needs to happen once for it to be considered sexual harassment.

## CHAT



**Mariana:** Guys, I need to get something off my chest... My boss sent me a message last night with a very strange tone. He said I "deserved a special dinner, just me and him" for my good performance. I was uncomfortable.

**Camila:** Mariana, that's very serious! Do you feel pressured to accept for fear of reprisals?

**Mariana:** Yes... He's my direct boss. I'm afraid I'll turn down this dinner and it'll affect my career.

**Lucas:** Mari, sexual harassment doesn't require physical contact. This pressure is already an indication. You need to report it to Compliance.

**Mariana:** Do you think I should really report it? I'm afraid of the consequences...

**Lucas:** Absolutely! The most important thing is your safety and well-being. The whistleblowing channel is there for that and the company must protect you.

**Camila:** We're with you, Mari. It's the harasser who needs to be afraid, not you. Don't be silent!

**Mariana:** Thanks, guys! Knowing that I can count on you gives me more strength. I'll report it!

When there is no hierarchy, sexual violence just changes its name and becomes **SEXUAL ASSAULT**, which is the practice of a libidinous (sexually invasive) act, without the consent of the other person and when there is no exercise of power between the harasser and the harassed person.

If the libidinous act is carried out with violence or serious threat, or sexual intercourse occurs without consent, the issue becomes even more serious and can be considered a crime of rape, the penalties for which are extremely serious.

 CHAT



**Fernanda:** Guys, something really annoying happened yesterday. A colleague from work kept insisting that he accompany me home after happy hour. I said no several times, but he kept insisting and even tried to kiss me and hug me. I was terrified.

**Carla:** Fernanda, this is very serious! Are you all right? If he touched you without consent, that's sexual harassment.

**Fernanda:** I'm still scared... I never thought he would do something like that.

**Lucas:** This is no joke. He had no right to insist or touch you without your permission.

**Carla:** Have you thought about reporting it to Compliance?

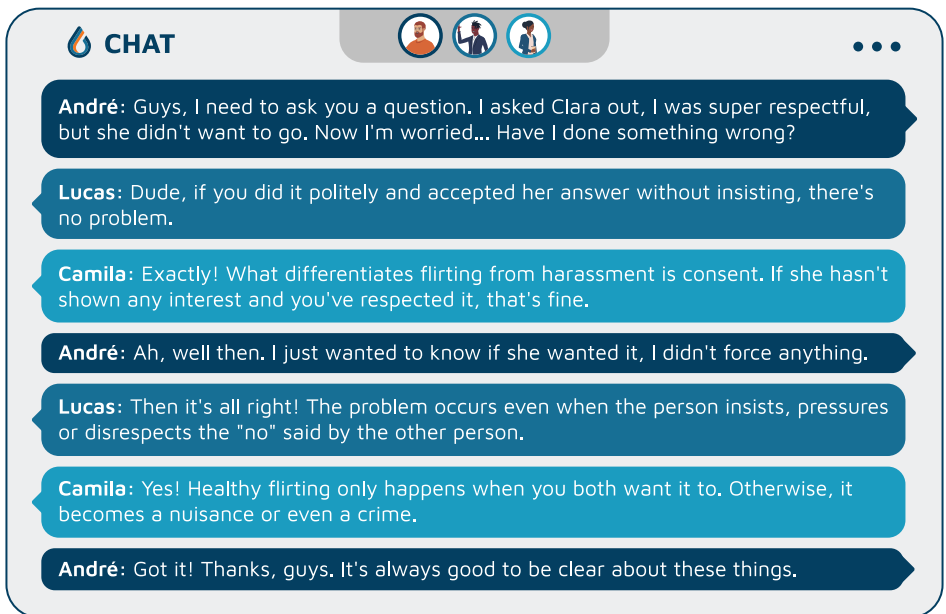
**Fernanda:** I'm afraid of making a fuss, but he could be doing it to other people too, right?

**Lucas:** We're here to support you, Fe. This cannot go unpunished.

**Carla:** Have you thought about reporting it to Compliance?

**Fernanda:** Thank you, people. I'm going to get help. I don't want anyone else to go through that too.

We would point out that in all the cases mentioned, a striking feature is the lack of consent from the harassed person. Therefore, a consensual **flirt** in which both parties want to have a relationship does not constitute any kind of harassment.



On the other hand, there are some inappropriate gestures or comments which, despite not fulfilling any of the characteristics of the crimes mentioned, violate the company's Code of Ethics and Conduct and can leave the other person feeling embarrassed. These are **INAPPROPRIATE BEHAVIOR OF A SEXUAL NATURE** such as bad jokes, unsolicited massages, unwanted touching, displaying pornographic material and obscenity in the workplace, among others.

It is also worth noting that **COMPLIMENTS AND COMMENTS ABOUT THE BODY** are situations on the borderline between a positive comment and an inappropriate one. So don't do it!

And DON'T FORGET: it's the other person's limit, not yours! **NO MEANS NO** If the other person says "no", don't insist!

## CHAT



**Juliana:** Guys, I was super uncomfortable at work today. Marcos commented on my outfit and how it "highlights my body". I found it quite invasive.

**Carla:** Wow, Ju! How annoying!

**Juliana:** He's always cracking jokes or staring in a strange way.

**Lucas:** Well, that's inappropriate behavior! Comments about appearance, touching without permission and double entendre jokes have no place in the workplace.

**Carla:** Yes! Many people think it's just a compliment, but if it makes you uncomfortable, they've crossed the line.

**Juliana:** That's right. I don't want to make a fuss, but I don't want it to continue either.

**Lucas:** You can talk to him directly, making it clear that you don't like this kind of comment. If it continues, it's worth reporting it to HR or the Compliance team.

**Carla:** That's right! The important thing is that you feel safe and respected inside and outside the company. We're here to support you!

**Juliana:** Thank you, guys! I'll think about the best course of action. It's good to know I can count on you.

## CONSTELLATION ALSO **DOES NOT** TOLERATE:

Work analogous to slavery or child labor: an absolutely unacceptable practice that we will not tolerate under any circumstances. At our company, we value working conditions that guarantee dignity and respect for all employees. We value human rights and believe in promoting a fair and ethical working environment. In addition, we constantly strive for sustainable development, always in line with practices that respect everyone's integrity and social and environmental well-being.



**Fernanda:** Guys, I've found a new supplier to help us maintain the company's assets! The price is well below market value.

**Carlos:** Yes! But have you checked that he complies with all the labor rules?

**Fernanda:** What do you mean?

**João:** Like, if he respects workers' rights, doesn't use child labor or something like that...

**Fernanda:** Wow, I hadn't thought of that... I only looked at the price and the service.

**João:** Better check it out! We have to ensure that all our suppliers follow the same ethical principles as us.

**Carlos:** Exactly! The Quality and Compliance teams must be involved in carrying out the on-site audit and integrity analysis. If that supplier doesn't respect human rights, we can't do business with them.

**Fernanda:** I'm going to do it right now! It's not worth saving money at the expense of inhuman labor.

**João:** That's it! Here at Constellation, we do the right thing.

# DIVERSITY IS AN INVESTMENT, NOT A COST

Diverse ideas are the cradle for innovation and efficiency. That's why we have Diversity-related Goals and Commitments & Inclusion, such as: Working Groups for four under-represented groups (Race, LGBTQIA+, Women and People with Disabilities); Conversation Rounds and Mentoring Programs.

 CHAT



**Fernanda:** Guys, you've seen that the new manager comes from a completely different sector to ours. Will it work?

**Lucas:** I think it's great, Fernanda! The more diversity of experiences and visions, the more innovation for our team.

**Carla:** Yes! If everyone thinks the same, no one questions what has already been done and no one brings anything new. Having people with different backgrounds only adds to it.

**Fernanda:** It's true! I think I'm so used to the way we do things that I didn't even consider this side.

**Lucas:** That's right! Diversity can make a company grow.

**Carla:** Exactly! Innovation comes from exchanging different ideas. Let's give it a chance and learn from it!

**Fernanda:** I like that view! I'm going to see it as an opportunity to grow too.

# BEHAVIORS OUTSIDE THE COMPANY ALSO NEED TO BE ALIGNED

Our behavior outside the company must be aligned with Constellation's principles and values, as choices in our personal lives can have a negative impact on the company's reputation.

Be careful!

 CHAT



**Rafael:** Guys, did you see the video of João fighting outside the bar yesterday? It's going around the groups!

**Camila:** Yes, I did. Wow, what a situation! And he was wearing the company shirt... Bad image.

**Lucas:** We need to remember that, even outside of work, our attitudes can have an impact on the company's reputation.

**Rafael:** It's true! And these days, everything spreads fast. This could be very bad for him and for Constellation.

**Camila:** Exactly! It's not because we're out of the office or our unit that we can act in any way. Our behavior must always be in line with the company's values.

**Lucas:** Let's hope he learns from it. But here's the warning for all of us: what we do in our personal lives can have an impact on our careers and on the company.

**Rafael:** Absolutely! Better to think twice before acting, even outside the company environment.

# SUSTAINABILITY AND THE ENVIRONMENT: PILLARS OF OUR BUSINESS AGENDA

We believe in the responsible growth and development of our businesses, connecting our actions with the promotion of the Sustainable Development Goals (SDGs) proposed by the United Nations (UN).

Every year, we publish a report on our goals and commitments to the Environmental, Social and Governance (ESG) agenda so that everyone is aware of our objectives and deliveries, demonstrating that the impacts we produce on the environment are carefully monitored, contributing to an operational performance aimed at economic growth, combined with ESG commitments.



**Fernanda:** Guys, did you see that Constellation published this year's Sustainability Report? I was impressed by the environmental targets!

**Lucas:** Yes! It's great to see the company committed to sustainability. But I confess I'm still in doubt as to how we can contribute on a daily basis.

**Camila:** There are many ways, Lucas! Small attitudes make a difference. So we can contribute: by reducing paper waste, saving energy, disposing of waste correctly... Everything counts!

**Fernanda:** It's true! What's more, our projects have clear sustainable goals. I saw that even the hiring of suppliers is now subject to ESG criteria!

**Lucas:** This is very important! There's no point in growing without environmental and social responsibility. If we want a sustainable future, we have to act now.

**Camila:** Exactly! And Constellation has already shown that it is committed. Now it's up to each of us to do our bit!

**Lucas:** I agree! Let's reinforce this culture and bring it to our teams.

# WE COMPLY WITH LEGISLATION AND OUR REGULATORS

Constellation complies with all the rules established in laws, standards and regulations to ensure the compliance of our operation, including environmental, operational, regulatory, anti-corruption, anti-bribery, anti-competitive, prevention of money laundering and terrorist financing, insider trading, security, among others.

 CHAT



**Renato:** Guys, does anyone know if you can release that equipment before the inspection? Everything's fine, besides the paperwork...

**Mariana:** You can't, Renato. Without formal authorization, nothing goes into operation. These are the rules of the regulators and of Constellation itself.

**Carlos:** Exactly! Safety and compliance first. If we skip steps, we put everyone at risk.

**Renato:** I understood... But it takes a long time, doesn't it?

**Mariana:** It's part of the process. Here at Constellation, we follow the operating procedures to the letter. It's better to wait than to have problems with inspections or, worse, an accident.

**Carlos:** Here, we follow environmental, regulatory and safety standards without shortcuts. If you have any questions, just call Supervision.

**Renato:** Really, guys! It's about doing it the right way so you don't get a headache later. Thanks, guys!

# OUR CHOICES IMPACT THE COMPANY'S REPUTATION

Constellation has clear internal rules and established processes to keep the company away from situations that put its brand at risk. It is our duty to make choices that preserve the company's reputation.

## CONSTELLATION **DOES NOT** TOLERATE:

Any acts of corruption or bribery, bribery, fraud, money laundering, terrorist financing or unfair competition.

 CHAT



**Lucas:** What's up, guys! I need a little help... A supplier offered me an incentive to sign a contract with him. I said it was just a thank you for the time I spent evaluating the proposal. What do you think?

**Mariana:** Hey, Lucas! This could be considered bribery. Here at the company, we can't accept that kind of thing.

**Rafael:** It's true! Our policy is clear: no bribery or any practice that could compromise Constellation's reputation.

**Lucas:** But it's just a present... Everyone does it.

**Mariana:** Everyone? We don't! Accepting "gifts" may seem like a small thing, but it can become a serious problem. This violates Constellation's rules and could even have legal implications.

**Rafael:** Better to refuse and report it to Compliance. Take care of our reputation first!

**Lucas:** Got it! Thanks, guys. I'll deny it and report it. Better to avoid any risk!

**Mariana:** That's it! The company's reputation is in our hands.

# STAY AWAY FROM SITUATIONS THAT CAN GENERATE CONFLICTS OF INTEREST

All those corporate situations in which we think first of ourselves and then of the company have a strong chance of constituting a conflict of interest.

Always act with transparency and professionalism. Avoid people questioning your credibility.

If you have any questions, contact your manager, human resources or the Compliance team.

If you find yourself in conflict, don't forget to report it and refrain from making the decision.

Here are some examples:

- Receiving invitations to sporting or entertainment events not associated with commercial discussions;
- Hiring, promoting or moving family members in the same hierarchical line;
- Having family members or people with close relationships working for suppliers, competitors, clients, regulatory bodies, public bodies, etc.

 CHAT



**Marcos:** Guys, I've just received a VIP invitation to an incredible show from a supplier! I think I'll take it, right? Who would refuse?

**Camila:** Hey, Marcos! That could be a problem. Does this supplier have a contract with us?

**Marcos:** Yes, Camila, but I don't see a problem. It has nothing to do with work, it's just a show.

**Lucas:** So, Marcos, that's the risk! It can be seen as a conflict of interest. Accepting this kind of invitation could compromise your impartiality.

**Camila:** Exactly! If you need to make a decision about this supplier in the future, someone may question its credibility.

**Marcos:** Wow, I hadn't thought of that...

**Lucas:** Better check with the Compliance team. If you have any doubts, the safest thing is to refuse. Transparency first!

# GIFTS, ENTERTAINMENT AND HOSPITALITY CAN BE PITFALLS. KEEP YOUR EYES PEELED!

We can't receive and give what we want! Here at Constellation, we have rules and limits for these actions, which serve to avoid risky situations for us and for the company.

Whenever you offer or receive these items, don't forget:

- You need to report it;
- You must respect the value limit of USD 100 for private agents and R\$ 100 for public agents per event, limited to 2 events per year;
- The items given and received should not be extravagant;
- The reason for both giving and receiving must be legal and related to business discussions;
- You need to be careful with the rules of other countries;
- You can and should say "no" if something on offer seems strange to you;
- The recommendation is that everyone pays for their own meal / entertainment.



**Marcos:** Guys, I received a super expensive brand watch from a supplier today! I guess I was lucky, huh?

**Camila:** Hey, Marcos! But have you already reported this? Extravagant gifts can be a problem.

**Lucas:** Exactly! Here at Constellation, there is a value limit that we have to follow both to receive and to offer a gift. If it's over the limit, it's best to refuse.

**Marcos:** Wow, I didn't even think about that... What if I just accept without saying anything?

**Camila:** Bad idea, right? This can be seen as favoritism and even a conflict of interest. Better to be transparent and report it.

**Lucas:** Everything has to have a legitimate business reason and be within the company's boundaries.

**Marcos:** Got it! Better warn the Compliance team before this becomes a problem. Thanks for the warning, guys!

**Camila:** That's it! Better safe than sorry.

# DONATIONS AND SPONSORSHIPS

Caution is needed in these types of relationships:

- There is an express ban on donations by private companies to political parties, candidates or election campaigns;
- We only make donations in cash in exceptional cases and previously approved by the company's Board of Directors;
- We do not carry out sponsorships aligned with personal values and at odds with the company's strategy.

 CHAT



**João:** Guys, I'm organizing a fundraiser here at the company to support a candidate for councillor who shares all of our values. Who can contribute?

**Camila:** João, look out! Constellation cannot donate to political parties or campaigns. This is prohibited!

**Lucas:** Exactly! Everyone can have their own political opinion, but the company cannot become financially involved with candidates or parties.

**João:** Ah, but it won't be a donation from Constellation. It will be up to us, the employees.

**Lucas:** But it could be mistaken for a Constellation project! It's better to avoid it!

**João:** What if the donation is a sponsorship for an event he organizes?

**Camila:** You can't either! Sponsorships are only approved if they are in line with the company's strategy and are not based on personal values.

**Lucas:** In addition, any financial donation has to go through the Board of Directors. Nothing can be done without formal approval.

**João:** Well, I didn't know that... I'm glad I asked before! Better to avoid any problems. Thanks, guys!

# CORPORATE INFORMATION MUST BE SAFE WITH US

At Constellation, we ensure the security of the information we share, including personal data, and we comply with the law to the letter. We need to remember that:

- Even on the recreational network, we must not access inappropriate content;
- Copyright is protected by law;
- We do not share passwords or internal documents;
- We don't share personal data without proper protection (examples: by e-mail with people unrelated to the topic being copied, in documents without a password or not anonymized, etc).

 CHAT



**André:** Guys, does anyone have that report with the customer data? I need to send it to a partner who is asking for it.

**Camila:** André, calm down! We can't go around sharing information like this. This data is confidential!

**Lucas:** That's right! If you need to share something, you have to check with the team responsible first and make sure it's protected.

**André:** But it's just an internal report... I didn't even think it could be a problem.

**Camila:** That's right! But personal data needs to be protected, because of the LGPD (Brazilian General Data Protection Act/Law). If this data falls into the wrong hands, it could even lead to legal problems for Constellation.

**Lucas:** And remember: never share passwords or documents without security! Always check with the Compliance, Personal Data Privacy or Cybersecurity team.

**André:** Yes! Better make sure I'm doing it right. Thanks for the heads up!

# INSIDER TRADING

The improper use of inside information to gain an advantage in operations to buy or sell securities, such as shares or other securities issued by Constellation, is an illegal and highly damaging practice, both for Constellation and for the financial market in general, as it compromises transparency, investor confidence and the integrity of financial operations.

It's prohibited:

- Sharing or suggesting to third parties, on the basis of inside information, any advice on operations with the securities;
- Passing on this information to any person with the intention of enabling that person to carry out or refrain from carrying out transactions in the purchase or sale of securities; and
- Use this information to carry out transactions with securities issued.

**CHAT**

**Carlos:** Guys, I've just left a meeting and learned that the company is going to announce a huge contract in the next few days. The shares will go to the moon!

**Mariana:** Really? Is it worth buying some now?

**João:** Carlos, be careful with this kind of information! This could be insider trading, and it is illegal to use inside information to trade on the market.

**Carlos:** But I only commented to you...

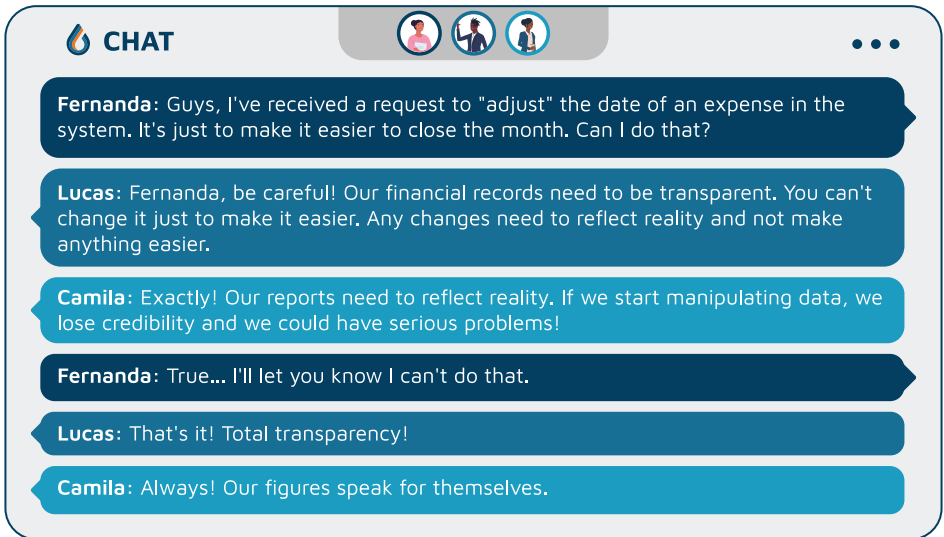
**João:** Even so, sharing or using non-public information to guide purchases or sales of shares is prohibited. This could jeopardize the company and bring serious penalties.

**Mariana:** Better not to risk it. Thanks for the warning, João!

**Carlos:** Thanks, guys! I didn't know it was so serious. I'll keep an eye on that.

# OUR FINANCIAL REPORTS ARE TRANSPARENT

Our financial reports show all the company's transactions recorded accurately and on time, accompanied by the appropriate approvals.



The image shows a chat window with a header bar containing a flame icon, the word "CHAT", three circular profile icons, and a three-dot menu. The chat contains six messages from three participants: Fernanda, Lucas, and Camila. The messages discuss a request to adjust the date of an expense and the importance of transparency in financial reporting.

**CHAT**

**Fernanda:** Guys, I've received a request to "adjust" the date of an expense in the system. It's just to make it easier to close the month. Can I do that?

**Lucas:** Fernanda, be careful! Our financial records need to be transparent. You can't change it just to make it easier. Any changes need to reflect reality and not make anything easier.

**Camila:** Exactly! Our reports need to reflect reality. If we start manipulating data, we lose credibility and we could have serious problems!

**Fernanda:** True... I'll let you know I can't do that.

**Lucas:** That's it! Total transparency!

**Camila:** Always! Our figures speak for themselves.

# ETHICS AND CONDUCT CHANNEL

The Ethics and Conduct Channel is available 24 hours a day, 7 days a week, to receive questions, suspicions or reports about conduct that violates the guidelines of the Code of Ethics and Conduct, Internal Policies and Procedures or laws of the countries where we operate.

Good faith reports, which may be anonymous or identified, will be dealt with based on the pillars that underpin the Ethics and Conduct Channel:

- Independence
- Confidentiality
- Impartiality
- Non-Retaliation

The records received in the Ethics and Conduct Channel will be investigated with due care, using public data and shared in our corporate tools, including personal data, as long as the purpose of the internal investigation is respected.

All employees and persons subject to the rules and guidelines of our Code of Ethics and Conduct have the responsibility to collaborate in good faith with any investigation conducted by Constellation or on its behalf.

If, after internal investigation, any misconduct is confirmed, a disciplinary measure will be applied, based on the Consequence Management Procedure and current legislation.

## CONTACT US

### PHONES

Brazil: 0800-721-0765

Panama: 507-8365930

India: 000-800-919-0475

United States: 1-800-950-9830

Luxembourg: 800-2-7320

Netherlands: 0-800-022-4886

### E-MAIL

[compliance@theconstellation.com](mailto:compliance@theconstellation.com)

### LETTER

Av. Presidente Antônio Carlos, 51  
5º andar - Rio de Janeiro / RJ - Brazil  
20020-010 - At: Compliance Department

### SITE

[www.canaldeeticaeconduta.com/theconstellation](http://www.canaldeeticaeconduta.com/theconstellation)







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