



THE PRODATA ENERGY CODE OF CONDUCT AND ETHICS

"The purpose of this code of conduct and ethics is to make known the guidelines established by PRODATA ENERGY C.A., which must be observed by all our employees and suppliers, as well as their professional conduct towards our external clients, whereby they are reminded first and foremost to act correctly when making decisions, avoid at all times any activity that involves conflict of interest, self-benefit, favoring third parties, and any conduct associated with the Code. We must always safeguard the image of the company and permanently strive to pursue the benefit of the company, its reputation and that of its associates".

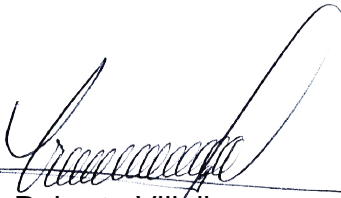


Message from the President of PRODATA ENERGY.

PRODATA ENERGY's reputation is measured by the actions of each of us vis-a-vis shareholders, customers, suppliers, competitors, government and society. These actions must be aligned with PRODATA ENERGY's Code of Conduct and Ethics in order for our reputation to be recognized. We all have a role to play in protecting and building PRODATA ENERGY's reputation.

Reputation is the building of trust through a set of core values, acts of integrity, provision of quality goods and services, fair treatment of our employees, accountability for our mistakes and correcting them, as well as an adequate return to the shareholder. Building this set of factors involves many challenges.

That is why our Code of Conduct and Ethics is focuses on people, and the reason for this is simple. PRODATA ENERGY is more than assets, operations, policies and procedures. The most important thing is us, because each member is an indispensable asset to maintain PRODATA ENERGY's reputation and guarantee the success and growth of all of us and of the company.



Roberto Villalba
President



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1 WHY DO WE NEED A CODE OF CONDUCT AND ETHICS?

Reputation is an important element of an organization's value. Customers prefer to do business with a trustworthy company and we all prefer to work for a company we are proud of.

Our Code of Conduct and Ethics aims to establish the ethical principles and standards of conduct that should guide the internal and external relations of our members and serves to establish patterns of performance and behavior, making clear what we believe in.

The presence of PRODATA ENERGY in the national and upcoming international market and the participation of our members in different business units, geographic and cultural regions which constitute globalized and competitive markets, require transparent patterns of performance and compliance with various legal and juridical norms.

This Code describes some of the standards that must be followed, not only to comply with applicable laws and regulations, but also to ensure that our individual behavior is in line with PRODATA ENERGY's corporate values: Honesty, Ethics, Leadership, Reliability, Respect, Tolerance, Responsibility and Commitment.

The guidelines of this Code of Conduct and Ethics must be observed by all members of PRODATA ENERGY, regardless of their duties and responsibilities. Compliance with this Code by each of us reaffirms our objective to maintain and consolidate PRODATA ENERGY's reputation.

Only by acting ethically with everyone around us will we be able to achieve our vision of being a sustainable company, with international presence and recognized for its trustworthy relationships and excellent management in the energy and industrial sectors.

2 HOW TO USE THIS CODE

PRODATA ENERGY's Code of Conduct and Ethics has several purposes; however the main one is to assist all of us in making ethical and correct decisions. The Code of Conduct and Ethics is the starting point in your search for guidance, recommendations and answers to whatever questions you may have.

You will find recommendations for complying with legislation and regulations In the Code of Conduct and Ethics. The issues will be addressed by topics that will help you understand the Code.

2.1 To whom does this Code of Conduct and Ethics apply?

All PRODATA ENERGY employees in all countries where we operate or will operate must know, understand and practice the legal provisions, internal policies and this Code of Conduct and Ethics.

We expect all our suppliers who have any kind of relationship with PRODATA ENERGY companies to act ethically and in accordance with this Code. When you contract with suppliers, make sure that they are aware of and accept the terms contained in our Code of Conduct and Ethics, that they have a good reputation and integrity, and act in an ethical manner.

2.1 Everyone's responsibility

The following responsibilities apply to all PRODATA ENERGY employees, without exception:

- Always comply with the laws. If you witness any act that in any way violates the laws of the country, PRODATA ENERGY's internal policies and this Code, immediately report the fact to your Unit Manager and/or contact the person responsible for the team and/or process where you identified the irregularity.
- Immediately inform your superior or any other PRODATA ENERGY resource about any act you are involved in that could characterize a violation of national or international laws, internal policies or this Code of Conduct and Ethics.
- Cooperate with and maintain the secrecy of investigations involving violations of internal policies and this Code.

2.2 Leadership's responsibilities

The following responsibilities apply to all PRODATA ENERGY leadership positions, without exception:



- You, as a leader, must be an example to follow, and for this reason, your actions in compliance with laws, internal policies and this Code of Conduct and Ethics must be impeccable.
- Become familiar with this Code so that you can assist your team by answering questions effectively.
- Ensure that they are receiving appropriate and timely training about our Code of Conduct and Ethics.

2.3 How can I get help on ethics-related issues at PRODATA ENERGY?

If you have any questions regarding compliance with laws, internal policies and this Code, you may consult your manager or other resources made available by PRODATA ENERGY such as the Human Resources or Legal departments.

2.4 What are the consequences for those who violate the Code?

Violation of the Code of Conduct and Ethics, legislation or regulations associated with our operations can have serious consequences for those involved, as well as for PRODATA ENERGY. In matters involving criminal conduct, non-compliance with the Code may result in criminal prosecution, and employees who violate this Code, laws or internal policies are also subject to internal disciplinary action, including termination of employment with just cause, if applicable.

2.5 How can I report a concern?

We may often have doubts about how to report an event involving this Code of Conduct and Ethics or other related issues. However, there is no right way; only different ways for the dilemmas that arise. In each topic of this Code we will address the ethical dilemmas that may arise in our day-to-day work, with some examples of the most appropriate way to act in these situations. However, when in doubt, do not hesitate to consult your manager or another PRODATA ENERGY resource.

3 THE PRODATA ENERGY CODE OF CONDUCT AND ETHICS

PRODATA ENERGY's values are the essential guidelines of this Code of Conduct and Ethics, for they are our principles and all our actions towards others must be based on them.

3.1 PRODATA ENERGY Ethical Values

Relationships of trust

a. With shareholders

The relationship with shareholders and investors should be based on accurate, transparent and timely communication of information that allows them to support PRODATA ENERGY's activities and performance, as well as in the search for results that bring positive impacts on PRODATA ENERGY's market value.

The relationship with the shareholders does not depend on the amount of shares they own, subject to legal restrictions.

b. With customers

The basic principle of PRODATA ENERGY's business activity is to serve the customer, with emphasis on quality, productivity and innovation, with social, community and environmental responsibility, and total respect for the laws and regulations of each product and region in which it operates.

We must maintain a relationship of courtesy and efficiency with our customers, offering them clear, precise and transparent information. The customer must be given answers - even if they are negative - to their requests, in an appropriate manner and within the expected timeframe.

c. With our associates

In the relationships among its members, PRODATA ENERGY expects cordiality and politeness in their conduct, trust, respect, dignified and honest conduct, regardless of their hierarchical position, position or function.

Each member of PRODATA ENERGY must do his or her part to ensure a work environment for others free of insinuations or restrictions of any nature, avoiding possible unpleasantness.



d. With our colleagues and suppliers

The relationship with suppliers must be long-lasting, without prejudice to the principles of free initiative and fair competition. In establishing this relationship we must encourage the implementation of these values, since the effectiveness in promoting our values will be an important factor in establishing or maintaining such relationships.

e. With society

Our business must be conducted in a responsible manner, abiding by applicable laws and regulations, supporting fundamental human rights and ensuring proper attention to health, safety and the environment.

Capacity to take on challenges

The constant search for innovative and ethical ways to transcend established patterns is a way to achieve the competitive advantage our market demands. We must have an entrepreneurial attitude, constructive criticism and constantly seek the evolution of our products and services, in our relationship with the customer and in improving organizational practices.

Sustainability

We must be aware that our organization is an integral part of a complex ecosystem and that our success depends on the quality of our relationship with our public, the environment and society. We must sustain the economic and financial viability of our business while preserving environmental integrity for future generations and building more harmonious relationships in society. We must always encourage innovation and cost reduction, because sustainability inspires people to do more with less and differently.

Talent and diversity

Individually, we have our talents, united we have them all, and it is for this reason that we must value, recognize and stimulate people's personal development. We must always be open to the plurality of experiences, backgrounds and perspectives and treat each other with respect to enhance the emergence of new ideas and stimulate innovation.

Focus on performance

Focused on results, we are improving in all financial, environmental and social aspects, and we must consider the interests of our public. However, the way we achieve results is as important as the results themselves, because by acting ethically in pursuing our results, we are creating an environment that reflects trust and integrity, thereby increasing our potential to achieve even better results.

Superior governance

Transparency, fairness and responsibility are the essential pillars of our interaction with shareholders, customers, employees, partners and suppliers, as well as with society. Our constant search to meet the expectations of our public is what will guarantee the generation of consistent results, honoring what has been agreed with efficient and responsible practices and reinforcing trust in our relationships.

3.2 Right to free competition

PRODATA ENERGY supports free enterprise and fair and ethical competition between companies.

The right to free competition brings together all the legal provisions and regulations aimed at ensuring respect for the principle of freedom of trade and industry. Several countries have specific laws to fight against this type of practices.

Many of these laws consider the formation of monopolies, or dominant abuse arrangements, dominant prices, exclusivity agreements, fixed sales and price discrimination as anti-competitive practices, in which the producer uses its market power to set different prices. These laws consider these practices a



criminal offense, with possible imprisonment for the persons involved and very large fines for the companies involved.

It is important that we know these laws which affect our company and our competitors. We must know them primarily to avoid violations, and also to ensure that competitors, customers and suppliers do not engage in anti-competitive activities that could harm PRODATA ENERGY.

Do not discuss issues such as prices, customers or geographic markets, suppliers, bidding, rationalization of production capacity or the reduction of excess supply in the market with a competitor.

3.3 Business integrity

Integrity is the quality of someone or something to be upright, honest, ethical and fair conduct. A person of integrity does not sell out for momentary situations, breaking rules and laws, harming others for superficial and inconsistent reasons.

It is this integrity of character and actions that we should all aspire to. It is through our integrity that our superiors, subordinates and peers recognize our values and merits. And it is through the integrity of each of us that the integrity of PRODATA ENERGY is built. Hereafter we will address each of the issues in which we must take care to ensure the integrity of our business.

4 SUSTAINABILITY

A key word for this item is care. We must be careful with ourselves, with the environment and with the environment. Compliance with the law and with external and internal regulations is vital for the good performance of PRODATA ENERGY.

The health and safety of our employees, colleagues, customers and suppliers must be treated with equal importance by all of us. It is essential that we protect each other while performing our activities. It is incumbent upon each of us to know, act and require others to follow the relevant health and safety laws and policies within PRODATA ENERGY's premises and those of our fellow employees, customers and suppliers.

Our commitment to environmental protection and the preservation of our natural resources is a guarantee that future generations will have sustainable living conditions.

5 PERSONAL INTEGRITY

5.1 Alcohol Abuse and Drug Use

We must ensure a safe and healthy work environment for everyone. The use of alcohol and illegal substances can create risks in our workplace, both for the person who is under the influence of these substances, as well as for our colleagues and ourselves. Therefore, you are not exempt from the responsibility of alerting your superior about such a fact, here is that your attention can make a difference in avoiding an accident.

Please keep in mind that the use, possession, sale or distribution of any illicit drug by our employees is forbidden.

PRODATA ENERGY recognizes that dependence on alcohol and other drugs is a disease and the treatment will be the same as for any other disease for employees who voluntarily declare their dependence and must follow the rehabilitation treatment recommended by a specialist.

For further details and information, please refer to PRODATA ENERGY's Alcohol and Drug Policy.

5.2 Harassment

We believe that everyone, without exception, should treat and be treated with respect. Harassment occurs when we subject others to humiliating and embarrassing situations. Thus, any conduct that is characterized as harassment, whether verbal, visual, work-related, physical or sexual, is not tolerated and will be subject to sanctions mandated by law.



It is important that we do not engage in intimidating, humiliating or hostile behavior. Avoid inappropriate jokes and comments. Beware of assumptions, as what is acceptable in one place and to some people may not be acceptable to others. Do not distribute or display inappropriate material and do not spread malicious rumors that denigrate the image of everyone or our company.

PRODATA ENERGY prohibits the practice of slavery and/or child labor. Our suppliers shall not use slave or unpaid labor, and it is prohibited to use child labor that is mentally, physically, socially or morally hazardous or harmful to children, or inappropriately interferes with their educational needs.

For further details and explanations, refer to PRODATA ENERGY's Policy on Prevention of Labor and Sexual Harassment.

5.3 Equal opportunity

We must cultivate an environment of inclusion within PRODATA ENERGY, where all aspects of the employment relationship are governed by lawful policies and practices, including recruitment, selection, hiring, evaluation, promotion, training, discipline, development, compensation and termination. Do not tolerate any form of discrimination and report any such situation.

5.4 Inside Information

Inside information is any information that would not normally be available to the general public and that may come to alter or influence a potential investor's decision. It is an offense to trade in company documents based on inside information.

All laws and regulations regarding the trading of the company's securities must be strictly observed and any kind of manipulation and disclosure of false information to manipulate the public prices of our shares is illegal. The consequences for non-compliance with applicable laws and regulations may result in a fine for the company and the offender, as well as internal disciplinary action.

Employees who have access to inside information must agree and sign the Employee-Company Confidentiality and Confidentiality Agreement. Likewise, if you have privileged information of other companies that are not linked to PRODATA ENERGY, the leakage of this information and the negotiation of documents of these companies are also considered a crime.

5.5 Use of IT and Communications Resources for Personal Purposes

IT resources and communications include desktop and laptop computers, fixed and mobile telephones, among other items provided by PRODATA ENERGY. We understand and accept that limited use of IT and communications resources for personal purposes may occur, but we must all recognize the negative impact that misuse of IT and communications equipment can have on our reputations and the reputation of PRODATA ENERGY.

The use of IT and Communications resources should not put company information at risk. Avoid inappropriate sites that may install viruses, spyware, malware and other malicious programs on company IT and communications resources.

The use of IT and Communications resources is monitored for purposes of information security, operational management and virtual crimes. The data from this monitoring may be disclosed and analyzed in cases of judicial investigation and analyzed in cases of judicial and criminal investigation or in accordance with the internal policies of PRODATA ENERGY.

Do not download and/or install any unlicensed or unauthorized software. Do not download or upload inappropriate material containing nudity, indecency, vulgarity or obscenity. Do not send personal e-mails with PRODATA ENERGY's signature at the bottom of the page. Do not disable security measures on the resource you use. IT and communications resources should not be used to engage in gambling, commit fraud, conduct your own business, infringe intellectual property rights, or commit virtual crimes.

5.6 Gifts and hospitality

When discussing gifts, presents and hospitality, the most important thing to consider is whether these perks influence people's decisions in any way, or whether they give way for others to interpret them in this way. Therefore, PRODATA ENERGY does not encourage our employees to solicit any type of gift or hospitality.



We also understand that offering entertainment to our colleagues, client and suppliers helps to create a good professional relationship, however we must use good judgment, discretion and restraint when offering any type of gift or hospitality.

It is important to understand that these rules apply both to protect the reputation of our company and our employees against unfounded accusations of improper behavior.

Before accepting or refusing a gift or a gesture of hospitality, try to check whether the acceptance of this may create an obligation for this person or company, or if this gift is a reward for a business transaction, or the gift has a value of more than US\$ 100.00, or may be considered a fee or bribe. If the answer is yes to either circumstance, do not accept the gift or gesture of hospitality, as you may be placing yourself in a position of being obligated to the person offering the benefit.

Evaluate whether the gift or hospitality that is being offered to you can be a restraint or is a risk to your integrity towards your colleagues. Do not distinguish between offering or accepting gifts or hospitality directly or through others.

Gifts with the company logo, such as agendas, notebooks, notepads, notepads and pens, do not require prior authorization for distribution. If you are in doubt about offering lunches or lodging to third parties, consult the National and International Travel Policy and if you are still in doubt, seek advice from your manager or other PRODATA ENERGY resources.

Never accept money or vouchers that have a monetary value, nor accept illegal gifts or hospitality. When you suspect that a gift or gesture of hospitality is excessive or illegal, politely refuse it quoting our Code of Conduct and Ethics if necessary.

For more details and information, refer to PRODATA ENERGY's Anti-Corruption and Anti-Money Laundering Policy.

6 FINANCIAL INTEGRITY

Both our personal and business integrity is at risk when we engage in actions that do not match the ethical standards that are expected of us. We must understand that our actions reflect not only how our company is viewed, but also how our moral integrity will be judged by others in our company, by our peers, customers, suppliers and the society around us.

Acting with integrity is an essential precept for us to align our actions with this Code of Conduct and Ethics.

6.1 Bribery and corruption

Bribery and corruption can take on many different forms, direct or indirect, and even more subtle names, such as facilitation payments. Please note that accepting or offering any kind of bribe from our collaborators is unacceptable.

Whenever you detect any corrupt act within PRODATA ENERGY or in negotiations with colleagues, immediately inform your immediate supervisor, the Legal Department, Internal Audit or any other company resource that can assist you with the matter.

Do not offer, accept, solicit or pay bribes. Do not use the payment of donations as an excuse for paying or receiving a bribe. Do not use others, such as your family members, to offer or accept bribes; you are compromising their integrity, your own and jeopardizing our company's integrity.

Anti-corruption laws dictate serious consequences for infringing them. Avoid any activity that could be construed as bribery. Do not hire a third party to perform an activity that cannot be performed ethically or legally. This attitude will leave our company in a position of liability for any illegal act that is committed.

For more details and precisions, refer to PRODATA ENERGY's Anti-Corruption and Anti-Money Laundering Policy.



6.2 Money Laundering

The attempt to conceal financial assets or property derived from a criminal practice, or to make them appear to have a legitimate origin, or to make expenditures for illicit activities, is known as money laundering. This practice is considered a crime by several instruments of international law.

Money laundering is often a difficult activity to identify, however other activities considered suspicious are associated with it. Always try to identify these situations and report them. Some of these actions include those where it is not possible to verify the data of the parties involved, willingness to pay above market prices, transactions conducted by intermediaries, abnormal agreements, unnecessary transactions, agreements with unknown parties, transactions with high risk countries (consult the FATF - Financial Action Task Force).

Do not get involved in transactions that you know involve criminals or proceeds of crime. Do not try to investigate money laundering cases. This is a job for specialists and you may be putting your safety at risk. Do not discuss your suspicions outside the company or with the parties involved in the transaction. Any investigation should be kept confidential.

For further details and clarification, refer to PRODATA ENERGY's Anti-Corruption and Anti-Money Laundering Policy.

6.3 Financial Reporting

PRODATA ENERGY's accounting practices and financial reporting must reflect compliance with local rules and regulations. All transactions must have a level of authorization for general, specific or delegated access. Do not perform a transaction which does not have prior authorization.

All reports issued must clearly reflect the transactions performed and the financial position of PRODATA ENERGY. Our internal controls must ensure that our financial reports are correct and were prepared in accordance with applicable regulations.

6.4 Conflicts of interest

Conflicts of interest affect both your personal integrity and the financial integrity of PRODATA ENERGY and arise when our personal interests interfere or appear to interfere with our ability to perform our work impartially. A conflict of interest depends on what each person considers advantageous to himself or herself, and for this reason it is not possible to describe every situation that could give rise to a conflict of interest. Thus, remember to carefully evaluate each situation on its particulars.

We must recognize a potential conflict of interest, disclose the fact to PRODATA ENERGY, and remove ourselves from the situation that may be causing such conflicts. We must not become involved in the hiring process, supervision, evaluation or discussions with comptrollers, audits or human resources involving any relative working at PRODATA ENERGY.

We must not use our position or privileged information to satisfy personal interests or to obtain direct or indirect gains. Do not allow gifts, favors or your relationships with colleagues, customers and suppliers to influence your business decisions.

If a job offer from a colleague, customer, supplier or competitor constitutes a conflict of interest, escape from this situation. Do not suggest that a supplier employs a relative of yours.

When we have a family or romantic relationship with another person within PRODATA ENERGY, we must be careful with the proximity to the hierarchical level in the company, because even if we are acting correctly, others may believe that their judgement is influenced. Communicate the conflict of interest so that we can help you resolve this issue.



6.5 Political activities and contributions

PRODATA ENERGY will restrict the partisan political activities of its members. However, our company is politically neutral and our members should always act in a personal capacity and in a manner that does not interfere with their professional responsibilities.

Do not allow PRODATA ENERGY funds and resources to be used for partisan political activity inside or outside the work environment. Use of work time, telephones, e-mail or meeting rooms for partisan political purposes violates this Code of Conduct and Ethics.

Do not use your position within PRODATA ENERGY to try to influence another person, make contributions or offer political support. PRODATA ENERGY accounts should not be used to make contributions to political parties, politicians or political campaigns. Do not use philanthropic donations as an excuse for political payoffs.

The dissemination of political propaganda on PRODATA ENERGY premises, vehicles, publications or any other PRODATA ENERGY property is not permitted. It is important to understand that members who participate in political activities do so as citizens and not as representatives of PRODATA ENERGY.

For further details and clarifications, please refer to PRODATA ENERGY's Anti-Corruption and Anti-Money Laundering Policy.

7 ASSET INTEGRITY

Our physical, financial, tangible or intangible assets must be protected to preserve and multiply their value. You are responsible for protecting PRODATA ENERGY's assets.

7.1 Protection of corporate assets

Some of PRODATA ENERGY's assets that you must protect include, but are not limited to, buildings, facilities, machines, equipment, tools, supplies, communication facilities (telephones), computers, investment funds, accounts, computer programs, information, technology, documents, know-how, data, patents, trademarks, copyrights, or time use, and any other resources or properties of PRODATA ENERGY.

Our assets must be protected against wear, loss, damage, misuse, theft, misappropriation or infringement.

Falsification of asset records or misrepresentation of facts may constitute fraud and result in civil and criminal liability for both the individual and the company.

The use of work time for personal activities should not occupy more than a reasonably modest amount of time, since PRODATA ENERGY expects all employees to devote the time necessary to fulfill their responsibilities.

Just as we must take care of our own assets, it is essential that we take care of the assets of others. Our colleagues, customers and suppliers must trust that we will use their assets as a priority, and protect their patents, trademarks, confidential information and other assets.

Do not conceal, alter or destroy PRODATA ENERGY records and documents, except in accordance with our policies. Do not use any means to conceal, modify or destroy evidence that may be used in an investigation. Usually an expert can uncover these actions which will generate an even greater cost to you and the company.

Do not falsify records of any kind: fiscal, accounting, expenses, etc. This practice tarnishes your image and that of the company.

8 INFORMATION INTEGRITY

Information, besides being an asset of PRODATA ENERGY, can also hold a competitive advantage. Protect this information from falling into the wrong hands.



8.1 Intellectual Property

Intellectual property includes patents, trademarks, domain names, copyrights of publications and computer programs, industrial design, industrial secrets, rights over agreements, among others.

PRODATA ENERGY's intellectual property assets generate a competitive advantage over our competitors and we must be careful that this advantage is not lost by the leakage of information outside the organization. Likewise, we must protect the intellectual property of colleagues, customers and suppliers entrusted to us.

Before any research, development or commercialization, an assessment of the risks imposed by third party intellectual property must be performed. Do not discuss intellectual property issues with personnel outside PRODATA ENERGY without authorization. Do not use a trademark outside the patterns approved in the Trademark Manual on documents, uniforms, helmets, agendas, and pens, among others.

If you are in doubt whether a product or process developed within PRODATA ENERGY can be patented, contact your superior, or PRODATA ENERGY's Legal Department. They will know how to proceed with this verification.

8.2 Privacy and data protection

We respect the individual's right to privacy of personal data in the company's possession; however, our employees should not assume that communications or documents they create, send or receive through PRODATA ENERGY's computers or telecommunication resources are private. To the extent permitted by local legislation, PRODATA ENERGY monitors all its means of communication to ensure compliance with internal policies and this Code of Conduct and Ethics.

8.3 Records Management

Records are all the physical or electronic documents containing a set of information created or received as evidence of an activity. Thus, every activity we perform can generate a record related to business activities: accounting, fiscal, financial, commercial, among others. Some examples include policies, procedures, contracts, reports, specifications, catalogs, minutes, sound and/or image recordings, e-mails, etc. These records may have a longer useful life or be temporary.

The fidelity of our records demonstrates our ethical performance with everyone. Thus, we emphasize the importance of recording all information in a correct and reliable manner, storing them for the time required by law or by internal policies, and disposing of them as specified.

Since records are often directly related to a person's activities, it is important that when there is a change of position, the records are passed on to the person who will temporarily or permanently replace him/her. Keep in mind that a record is based on its content, regardless of its format.

8.4 Public Disclosure

Any public information in PRODATA ENERGY will be disclosed in a timely, accurate, consistent, complete and fair manner. Such disclosures shall be made by authorized spokespersons in writing.

Public disclosures include reports provided for in laws and regulations, press releases, speeches, presentations, articles, publications and information contained on our website, as well as other disclosures that may be attributed to PRODATA ENERGY.

Do not provide information to outsiders about PRODATA ENERGY, and be careful when talking to media professionals, such as journalists. Be polite and inform that you are not authorized to disclose any information about the company. Any public disclosure of a relevant fact must be analyzed by the Institutional Relations area.

Do not postpone the presentation of relevant information to your superior and when passing the information, do not hide facts. Tell the whole story.



8.5 Business Communications

It is important for everyone to understand that any communication from one of our employees to another person, inside or outside the company, will reflect on PRODATA ENERGY. For this reason we must be careful in how we use our communication tools. Incorrect or careless communications can create serious problems and risks, both for the sender and the receiver of the message, as well as for PRODATA ENERGY.

Some tips for good communication are: do not attribute blame; do not underestimate or overestimate; do not speculate; do not treat serious matters with indifference; do not make decisions which are not within your competence - mainly related to the signing of contracts that commit PRODATA ENERGY together with third parties; do not share information which you are not authorized to share.

9 QUALITY, INDUSTRIAL SAFETY, ENVIRONMENT AND OCCUPATIONAL HYGIENE REQUIREMENTS

QISEOH requirements must be met in order to protect the health and safety of employees, contractors and local residents, minimize community disruption, reduce emissions, minimize impact on the ecosystem and biodiversity, and use less energy, water and other natural resources.

For more details and precisions, refer to PRODATA ENERGY's Quality, Industrial Safety, Environment and Occupational Hygiene Policy.

Responsibility of Employees:

- Comply and enforce compliance with the measures, instructions, risk analysis and work permits.
- Follow the company's internal policies.
- Act in a preventive manner, aiming to ensure the health and safety of PRODATA ENERGY's employees.
- Promote occupational medical examinations;
- Attend Safety Dialogues and safety trainings.
- Use Individual Safety Equipment according to the company's internal procedure.
- Immediately notify their superior of any possibility, incident or accident that compromises the environment, employees or property. Participate in the investigation of incidents and disclose them so that they do not happen again.
- Smoke only in previously authorized places.
- Collect the garbage we produce, classify and store it in an appropriate place, and save water and energy.

10 COMMITMENT

This is the PRODATA ENERGY Code of Conduct and Ethics, which is intended to be a guide of good practices to conduct our business with integrity in order to maintain our reputation.

We must have reviewed and understood the law, the internal and external policies and act in a respectful manner with all our public.