

DOMMO ENERGIA

Code of Conduct

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The Dommo Energia Code of Conduct

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Dommo Energia Principles and values and purpose of the Code

Dommo Energia seeks to conduct its business profitably with environmental responsibility and social justice. The respect for partners and employees, the business transparency and the sustainability are some of the principles of the company. Dommo Energia values good corporate governance practices and cherishes partnerships with reputable companies and institutions, aimed at ensuring the good progress of its activities and a harmonic relation with the society and the government.

To this end, the Code of Conduct gathers a series of policies that reflects the culture of Dommo Energia and provides behavior guidances, in order to manage conflicts of interest, prevent misconducts, and enforce the principles of transparency, fairness, accountability and corporate liability within the activities of the company.

Scope

Dommo Energia Code of Conduct is mandatory for all employees, including directors, board members, members of the audit comittee, and other other comittee members, who shall take notice of its content and sign the Statement of Commitment attached hereof. The code shall also serve as a reference for our partners, suppliers, customers and shareholders, as well as to our controlled and affiliated companies.

In agreements entered with partners and suppliers, Dommo Energia must, when applicable, require the other party to comply with the principles of this Code of Conduct, subject to penalties for non-compliance, such as: termination of the agreement without payment of any outstanding debts and / or any burdens on Dommo Energia (like payment of termination fines); reimbursement to the company of any burdens arising out of conducts violating the provisions of the Code; etc.

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Relationship with Stakeholders

Relationship with Stakeholders



Employees

Dommo Energia prizes a professional, respectful, safe, organized and harmonic work environment. Stimulating the opportunity equality, the diversity and respect for the right to freedom, aimed at valuing human beings and ensuring their health and physical integrity.

All employees deserve our respect and attention, regardless of their position or years of service in the company. Dommo Energia believes that complaints and suggestions from the employees contribute to its continuous improvement.

Dommo Energia policy comprises maintaining highly-qualified professionals through competitive salaries and commitment to the development of talents, providing training to employees, specially regarding safety and health.

Shareholders

The relationship with shareholders must rely on an open, accurate, equitable, transparent and timely report of information enabling the monitoring and understanding of Dommo Energia's activities and performance.

All employees shall be aware of, and strictly comply with, the policies and regulations of Securities Trading and Information Disclosure, as well as any other guidelines from the Investor Relations and Legal departments addressing the relationship with shareholders (Blackout Periods, confidentiality of Material Information, etc.).

Reporting or supplying information to shareholders (as well as to any other stakeholders) is limited to the Investor Relations department, and the employees, therefore, shall not make any kind of communication on behalf of the company.

Relationship with Stakeholders



Suppliers

The process for selecting or hiring a product supplier or service provider of any kind shall meet high standards of fairness and transparency, taking into account the best interests of Dommo Energia, and be driven by technical and financial criteria, such as competence, quality, meeting deadlines, price, economic stability, etc., and, therefore, the granting of any kind of benefits is not accepted. The same principles shall guide the management of ongoing agreements.

All hirings shall be carried out in accordance with the purchase policies and regulations of Dommo Energia (compliance with the minimum necessary amount of quotations, involvement of the Purchasing Department, etc.). Business with suppliers or service providers in non-compliance with the principles of this Code are strictly prohibited.

Competitors

The relationship between Dommo Energia and its competitors shall be guided by the adoption of fair and ethical competitive practices and in strict compliance with the laws, thus being prohibited predatory or dishonest competitive behavior. Likewise, the provision of proprietary information of the company to competitors is also forbidden. The company and its affiliates undertake to faithfully comply with the antitrust laws of the jurisdictions in which it operates.

Subject to the above, Dommo Energia shall conduct its activities aiming at the competitiveness and value creation, refusing any practices that may hinder it.

Relationship with Stakeholders



Trade Unions

Dommo Energia safeguards the freedom of association and the right to collective bargaining, perceiving the unions as legal representatives of employees, and is constantly seeking the dialogue. The negotiations and relationship with those partners shall only be made by formally authorized persons.

Customers

Dommo Energia is focused on contributing to the value creation process of its customers, always taking into account their expectations and rigorously complying with all specifications required, while seeking failure mitigation.

Dommo Energia makes sure that customer information is kept confidential, unexposed to third parties, unless otherwise required by the transaction and with prior consent of the parties.

Professional Associations

Dommo Energia acknowledges the relevance of Professional Associations in the development of the industry. The involvement of employees as representatives of the company in steering committees of Professional Associations and related events, present in the market where the company operates, shall be appointed by the management.

Relationship with Stakeholders



Press

Contacts with press shall only be held by spokesperson appointed by Dommo Energia, who shall be duly instructed by the Communication and Investor Relations departments.

There shall be commitment to the dissemination of information in a transparent and timely way, subject to the ethical and legal principles underlying an open and honest interaction with the press, guided by the policies and internal rules for the dissemination and use of information.

It is prohibited for any unauthorized person to contact the press or speak on behalf of Dommo Energia. The employees shall immediately forward to the Communication department any demands as they may receive from the press, through the following email address: comunicacao@dommoenergia.com.br.

All Dommo Energia's employees which may publicly speak about the operating market of the Company or its affiliates shall clarify that his / her views and conclusions are his / her sole responsibility and do not necessarily reflect the understanding of the Company.

Relationship with Stakeholders



Civil Society

Knowing that the society in the surroundings of each Dommo Energia unit has specific needs and aims, the company understands the open and transparent dialogue with such society a top priority, always respecting local specificities, establishing partnership and trust ethical relations and stimulating the development of the area.

Government

Dommo Energia sustains a nonpartisan and permanently open dialogue with all levels of governments where it operates, as it believes it to be an important step towards the embodiment of a sustainable development model for the country, and consequently for its business.

With regards to licensing agreements it holds, Dommo Energia and its affiliates shall strictly fulfill their legal and contractual obligations, and seek to protect the rights arising out of the preservation of the economic and financial balance. Relations with the relevant grantor government shall be based on accountability, transparency and spirit of cooperation. Therefore, claims shall not be raised towards the grantor if such are not recognized as legitimate and elementary.

Conflict of interest

The image features a solid blue background. On the right side, there are several thin, white, curved lines that intersect and overlap, creating a dynamic, abstract pattern. The lines are smooth and vary in curvature, some appearing as arcs and others as partial circles. The overall composition is clean and modern.

Conflict of interest



A Conflict of interest occurs when someone can influence a decision of Dommo Energia or use insider information resulting in any kind of personal gain, either directly or indirectly, for themselves or their family members or friends.

Conflict of interest comprise (without limitation), the following cases:

- ◆ Use confidential information to obtain benefits for themselves or related persons;
- ◆ Undertake external activity of personal nature which may affect its performance in the company;
- ◆ Accept gifts, entertainment, travel or benefits from third parties, which may be understood as retribution for obtaining a favorable position in the company;
- ◆ Buy shares of the customers or suppliers of the company based on insider information or provide such information to any third parties;
- ◆ Use of the company's resources and assets for personal interests;
- ◆ Recommend the hiring of candidates by customers, suppliers or partners;
- ◆ Hiring of relatives, or induce someone to do so, ignoring the principles of competence and potential.

Employees must not engage in activities involving any Conflict of interest, timely reporting such a conflict to the management.

If not sure if a situation is interpreted or not as Conflict of interest, the employee must report the details to the management or the Conduct Committee, through the distribution list DL_comitedecondata, which will provide all necessary clarifications.

Management Responsibility

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Management Responsibility



According to the Company's Bylaws, and aligned with the Brazilian Corporate Law, the Management of Dommo Energia is exercised by the Board of Directors and by the Officers. They must manage the company in line with the provisions of the Bylaws and this Code of Conduct, especially regarding the topics of "Relationship with Stakeholders", "Conflicts of Interest" and "Fraud and Bribery".

Managers should not engage in activities or organizations that compromise their dedication to the interests of the company, nor receive direct or indirect remuneration from Dommo Energia's suppliers, shareholders or any other public of interest.

They must perform their duties in a manner that always prioritize the best interest of the company, particularly when in conflict with the interests of shareholders or third parties. The administrator undertakes to formally declare to the management as a whole any conflict of interest, whether existing or potential, including possible shareholders' diligences for the administrator to perform acts in which the interest of the shareholder overrides the interest of the company.

With regard to the application of this Code of Conduct, Managers must:

- ◆ Ensure that all employees (including officers, board of director members, and all committee members) take notice of its content and sign its Statement of Commitment;
- ◆ Watch over its compliance;
- ◆ Encourage the notification of its non-compliance through the Reporting Channel;
- ◆ Provide the Statutory Audit Committee, if requested, access to the necessary information and tools for the evaluation and treatment of reports received.

Work Environment

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Work Environment



Prejudice

Dommo Energia treasures the diversity in its employment relationships. Therefore, everyone shall receive respectful, hospitable, and fair treatment, regardless of the position or function performed. The company does not tolerate any kind of discrimination or prejudice as to race, religion, age, sex, political opinion, nationality, marital status, sexual orientation, physical condition or any other.

Harassment and Abuse of Power

Dommo Energia does not tolerate psychological, economic or sexual harassment, or harassments of any other nature, nor situations constituting disrespect, intimidation or threats in the relationship between employees.

Psychological harassment consists of the repetitive and prolonged exposure of an employee to humiliating and embarrassing situations during the working hours and the exercise of his / her functions.

Use of drugs, alcohol, tobacco and guns

Seeking the wellbeing, safety and productivity of its employees, it is strictly prohibited the use, in the Work Environment, of illicit drugs, alcohol and tobacco, or guns (except for legally authorized persons in charge of the safety of other employees and the equity of the company).

Work Environment



Slave, forced or child labor

Dommo Energia does not tolerate, both in its operations or in suppliers and business partners, slave or forced labor, or analogous conditions, nor the use of child labor. Where applicable, agreements signed with suppliers shall contain a clause with specific statement in this regard, regardless of the clause binding them on this Code.

Forced work is any work or service obtained from any person under any threat, also considering that the person does not voluntarily offered to do so.

If minors between 16 and 18 years are hired in accordance with the laws of the country, the company shall ensure that the work will not prevent the minor to attend school.

Company assets

The assets, equipment and facilities of the company shall be exclusively used for the conduction of its activities and may not be used with personal purposes, except in specific situations as may be defined by Dommo Energia.

The employees are responsible for ensuring proper use and preservation of the Company assets under their custody.

Matters relating to the donation, sale and assignment of the company assets use shall be subject to the Legal department assessment.

Work Environment



Electronic and Information Systems

Aiming the smooth performance of the employees' professional activities, Dommo Energia provides access to telephone and internet, use of emails, software, hardware, equipment and other assets, which shall be used only for the aforementioned purpose, subject to other provisions provided for in policies, guidelines and other directives of the company.

The casual use of electronic systems and computer resources for personal matters is allowed provided that it does not conflict with internal standards and guidelines, nor undermine the progress of work. It is strictly prohibited to exchange, restore, storage or use of pornographic, violent, discriminatory, defamatory contents, which may be disrespectful to any individual or contrary to Dommo Energia policies and interests.

According to the case law, and based on the employer governing powers, any and all data created and kept in Dommo Energia's equipment and information systems are the exclusive property of Dommo Energia. The employee shall be aware that the company may have access to the records of the use of internet, e-mail and information stored on computers, as well as the use of mobile and landlines. Therefore, the employee shall not expect privacy with respect to these matters.

The password to access the systems is for the exclusive personal use, and it shall not be passed to any third parties, even if a coworker or superior.

Software and programs of any type shall not be copied or installed on Dommo Energia computers without prior authorization from the Information Technology department.

Fraud and Bribery

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Fraud and Bribery



Fraud, for the purposes of this Code, is any intentional act or omission, aiming to deceive or injure another person, that may result in loss to the victim and / or improper benefit, either financial or not, to the author or third parties. The misrepresentation or omission of materials circumstances in order to induce or mislead third parties.

Corruption, for the purposes of this Code, is any direct or indirect act consisting of authorization, offering, promise, request, acceptance, delivery or receipt of improper benefit, either financial or not, involving individuals or legal entities, officers – either public or not - in order to make a certain act to be practiced or not.

Dommo Energia condemns each and every form of fraud and bribery in all levels, and guides its employees, suppliers, customers and shareholders to:

- ◆ Repudiate and report fraud and bribery cases under any form, either directly and indirectly, actively or passively, and whether or not it involves cash;
- ◆ Not imply, request, accept or receive, nor promise, offer or pay bribes, kickbacks or any other improper benefit;
- ◆ Not tolerate nor support any initiative related to "money laundering" (process carried out to hide or legitimate illicit funds), paying attention to unusual or complex patterns of payment, unusual transfers to / from countries unrelated to the relevant transaction, suspicious transactions, etc.

Dommo Energia encourage all its employees, partners, suppliers, customers and shareholders to take notice and comply with the guidelines of Act no. 12,846, known as the Anti-Corruption Act, which provides for the administrative and civil liability of legal persons for practicing acts against the public, national or foreign administration.

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Gifts, Hospitalities and Giveaways

Gifts, Hospitalities and Giveaways



Gifts, giveaways and institutional invitations are common practices of kindness and hospitality normally accepted in a business relationship. In this regard, the employees may eventually accept gifts and giveaways, provided that they do not represent the obtaining of benefits in any negotiations and are part of the communication strategy of customers, partners or suppliers (and are widely distributed to people with whom it maintains a business relationship).

Under no circumstances the employees should offer, give, request or accept from their customers, partners or suppliers: cash (or equivalent); personal services; loans; illegal or inappropriate items; giveaways and hospitalities during business decision-making periods. Any possible development of gifts to partners / suppliers on behalf of Dommo Energia shall be carried out by the Communication departments and subject to prior approval from the Management.

Invitations to events or travel expenses borne by customers, suppliers, government agencies and other stakeholders may only be accepted where there is a real opportunity to develop such a business contact, provided that they have also been extended to professionals from other companies and duly authorized by the management.

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Occupational Health and Safety and The Environment

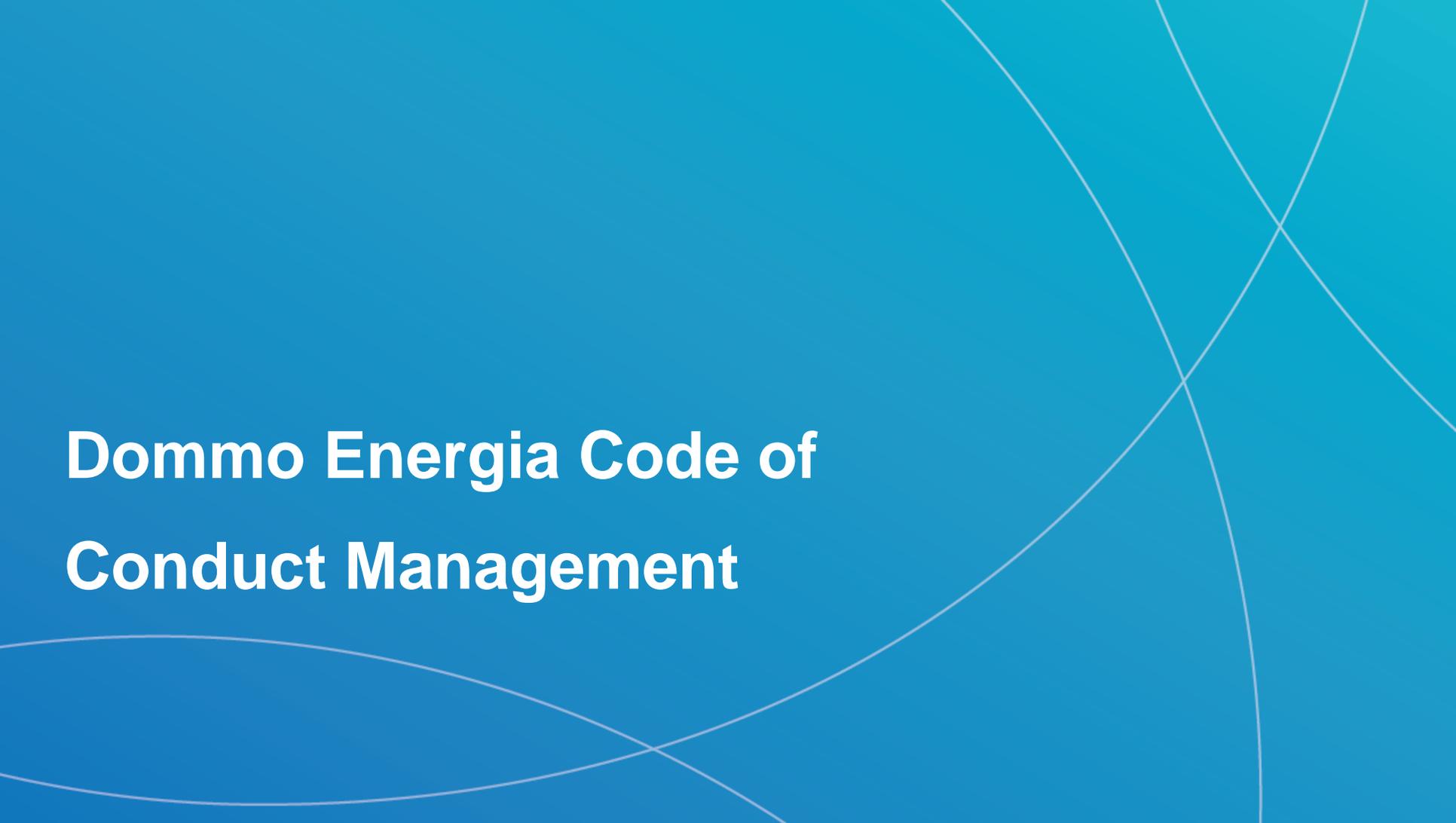
Occupational Health and Safety and The Environment



The health, the physical integrity and the environment protection are top priority to Dommo Energia, standing above economic or technical matters. The company is fully transparent with regards to all information concerning the health, the safety and the environment which may affect its employees, its surrounding communities or the environment itself.

All employees shall be aware of Dommo Energia's health, safety and environment policies, proceedings and practices and strictly adopt them in their daily activities.

Dommo Energia expects every employee to carefully observe the Work Environment, identifying possible hazardous situations. If any indication is found, such fact shall be reported to the management and the workers involved warned.

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Dommo Energia Code of Conduct Management

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Conduct Committee

In line with good corporate governance practices, the Dommo Energia Code of Conduct was drafted by a committee composed of different departments of the company related to the issue, namely: Governance, Human Resources, Legal, and Communications; being validated by the Management, reviewed by the Independent audit Committee, and ultimately approved by the Board of Directors.

The Conduct Committee is responsible for the wide dissemination and easy access to the code, the control of adoption thereof by employees, and any updates as may be necessary.

Questions or suggestions for improvement on the Dommo Energia Code of Conduct should be referred to the Conduct Committee through distribution list (DL_ comitedecondata).

The Conduct Committee and the Board of Directors are jointly responsible for setting the guidelines and regulations of the Code of Conduct. Although the analysis of complaints related to the violation of the code is the responsibility of the Statutory Audit Committee.

Updates

Dommo Energia Code of Conduct is subjected to a yearly assessment carried out by the Conduct Committee, with a view to identifying updates / amendments needs.

In addition to the periodic yearly assessment, the Code of Conduct may be adjusted at any time, based on suggestions from the employees, the Internal Audit, the Management or related parties.

Any amendments shall be subject to appreciation of the Management and final approval by the Board of Directors.

Dommo Energia Code of Conduct Management



Reporting

Dommo Energia expects its employees to immediately notify the Reporting Channel if they experience, witness or become aware of any behavior that may constitute non-compliance with the guidelines of this code. The company respects and welcomes reports made in good faith and forbids retaliation and any punishment against those making a good faith report.

The Reporting Channel contemplates two forms of reporting: e-mail or phone. Both channels of communication allow the receipt of anonymous or identified reports, according to the complainant's preference.

All reports received by the channel (both anonymous and identified) will be analyzed by the members of the Statutory Audit Committee or the Board of Directors, in the absence of the first, with the commitment to be impartial and transparent, guaranteeing the confidentiality of information and preserving the identity of those involved.

Choosing the identified report enables the person to be informed on the outcome of findings and the measures taken, or also contacted for further clarifications, if the information provided is considered insufficient for assessing the report.

Even in identified reports, the Reporting Channel is committed to the confidentiality of information, and preserves the identity of those involved.

Here are the details about the channels for receiving reports:

Dommo Energia Code of Conduct Management



Phone

The number **2196-4666** is linked to a fixed extension, with no caller ID, which is automatically directed to a message recorder where the reporter may give their comments. The recordings are automatically forwarded exclusively to the members of the Statutory Audit Committee, who analyze it to proceed with the appropriate measures.

E-mail

Reports via e-mail should be sent to the address canaldedenuncias@dommoenergia.com.br , which is only accessed by the members of the Statutory Audit Committee.

Human Resources

Is worth mentioning that Dommo Energia Human Resources department shall continue empowered to receive reports, complaints, compliments and suggestions involving the company's structure (questions involving the hierarchical relationships, performance, etc.) in addition to channels previously described.

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Statement of Awareness and Commitment

Statement of Awareness and Commitment



I hereby declare for all due purposes that I am aware of the provisions of Dommo Energia Code of Conduct and undertake to fully comply with it in all situations directly or indirectly related to the relationship existing between me, or the company I represent, and Dommo Energia.

Name: _____

Place and date: _____

Signature: _____