



# CODE OF CONDUCT

FOR BUSINESS PARTNERS

Be8

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Now.



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# 1. Presentation and purpose

Be8 is committed to building relationships aligned with its values : integrity, sustainability and commitment. Aiming to build a business model based on these premises and seeking to contribute to a more just, ethical, and environmentally healthy society, the Company aims to establish business relationships with partners who also share these premises.

In this way, the purpose of this Supplier Code of Conduct is to inform and clarify to our suppliers, clients, service providers, and partners, who are directly or indirectly linked to the activities of Be8, what we understand by ethical conduct in business relations and corporate management, in addition to contributing by involving and expanding these values to all participants in their production chain.

## 2. Scope

This Code is applicable to all suppliers, clients, service providers and partners who engage, directly or indirectly with Be8 and with the companies of its economic group in the various countries in which it operates.

## 3. Continuous Improvement Applications

Be8 is aware that the expectations set forth in this Code represent a transformation in the way business is conducted, pointing to an economically prosperous and balanced market, integrated with social, environmental, and ethical development. Through this Code, in a continuous process of improvement, Be8 seeks to encourage its supply chain to also be engaged in participating in this dynamic process of improvement, both internally and externally.

Therefore, the acceptance and compliance with these guidelines are of fundamental importance for our business relationships to be long-lasting, once this presents the essential conditions expected by Be8 from its suppliers, customers, and third parties. By committing to this Code, one also affirms acceptance and the commitment to comply with it.



## 4. Guidelines for the selection of business partners

To carry out the selection of its business partners, the Company conducts a preliminary verification process of its partners' documents, in the same way that it values those who act in accordance and who are aligned with Be8's guidelines and expectations.

### a) Management and selection of suppliers

Be8 has some guidelines for the selection of its business partners. The periodic verification in public agencies is one of the practices carried out by the company to monitor its suppliers and clients, with the aim of mapping and preventing risks, aiming at the relationship with partners who are in compliance with registration, legal, environmental, labor, among others. It is worth remembering that the benefits of this process extend to you, partner, as it allows you to monitor and correct documentation and improve processes.

### b) Relationship between suppliers and conflicts of interest

A conflict of interest is identified when an employee, executive, or third parties acting on behalf of Be8 find themselves in situations that influence or may influence a decision, or who have the autonomy to make a decision that results, or may result, in some form of personal benefit, directly or indirectly, for themselves or for members of their family or friends.

Be8 strives to ensure that these conflicts do not occur within the company's operations and, if the existence of a conflict or its possible occurrence is verified, it should be promptly reported to the responsible area or through the Company's Whistleblowing Channel.

#### **Examples of conflict of interest and situations prohibited by Be8:**

- That its employees are owners, partners, or have direct or indirect influence over companies that may become suppliers or clients of Be8.
- The use of goods, services, and/or the provision of activities carried out by Be8 employees for their own benefit or for third parties by suppliers.

### c) Respect for others

We rely on our Suppliers to conduct their activities with mutual respect and collaboration, performing their duties with a focus on safety, well-being, and the dignified treatment of all employees and third parties involved in or affected by the execution of their activities. We do not allow aggression, abuse, harassment, whether physical, sexual, and/or verbal, as well as intimidation, or any other form of spite and offense to the physical or moral integrity of your employees or our collaborators.

## d) Gifts, Gratuities, Entertainment, and Hospitality

The way of Be8 to conquer, A forma da Be8 de conquistar, retaining customers and gaining market share is related to the quality of our products and services. Thus, it is prohibited to give, offer, or receive from clients, suppliers, or other business partners gifts and giveaways that serve to improperly influence business decisions or gain an unfair advantage. In certain circumstances, you may exchange gifts to maintain a good relationship, as long as:

- **The gift should have a legitimate purpose, hold symbolic value (usually below R\$200.00 or equivalent), and should not be frequent.**
- **The gift should not be in money or equivalent (credit cards, gift cards, vouchers).**

Business hospitality, including training, transportation, lodging, meals, and entertainment, is not prohibited if it is ethical in nature and the frequency of the occasion is reasonable.

## e) Use of alcohol, tobacco, illicit substances and possession of weapons

The use of alcohol, tobacco, drugs, and the possession of a bladed weapon (sharp and piercing objects, such as knives) and/or firearms are prohibited on the premises of Be8. The Company's business partners must instruct their teams to carry out their activities responsibly and without the influence of any substance that could impair their work performance. For health and safety reasons, smoking and the use of any tobacco products are strictly prohibited on our industrial premises, due to the flammable nature of fuel production.

Whenever you spot someone smoking, using illicit substances or carrying bladed weapons or firearms, immediately report it to company security so that the necessary and preventive measures can be taken.

## f) Subcontracting

The subcontracting is the outsourcing of the provision of services by third parties, that is, the transfer made by the contracting party of the execution of any of its activities to the third-party service provider company. Whenever our business partners subcontract suppliers or service providers, whether for the full or partial execution of obligations, the quality of the service or product must be ensured, with the obligation to comply with all guidelines and regulations defined in this Code being extended.

## g) Commitment to operational excellence

Be8 values business partners that operate with a focus on excellence in their products and/or services and honor the fulfillment of their obligations. Quality and discipline in delivery, agility in problem-solving, transparency in business practices, innovation, technical and operational contributions, as well as commitment to the Company, are behaviors recognized and rewarded by Be8.

## 5. Social Practice

Far beyond generating jobs and value, Be8 is committed to helping transform reality through its dedication to social responsibility, promoting real change in society, culture, corporate commitment, and work relationships.

### a) Labor, social security legislation and labor relations

Compliance with national and international labor standards, the commitment to paying labor charges, social security contributions, and other obligations and tax payments related to employment relationships are fundamental principles for Be8's business partners. Our suppliers, customers, and third parties must employ workers in a fair, correct, and lawful manner, complying with and promoting the protection and assurance of good working conditions.



### b) Human Rights:

Be8 respect the human rights and aim establish commercial relationships with suppliers, clients and third parties that share, respect and actively promote these rights.

#### i. Labor conditions: Health, security and salary

The Be8's commercial partners must to ensure and guarantee the respect of the fundamental rights of their workers by providing decent working conditions. A healthy work schedule, fair remuneration, a safe and healthy working environment, as well as the implementation of measures and the legal compliance with health and safety protection standards are fundamental practices to ensure the working conditions of the Company's suppliers, clients, and third parties.

#### ii. Forced/slave labor, child labor, and child sexual exploitation

Be8 repudiates all forms of forced or slave labor, child labor, and child sexual exploitation. Under no circumstances may its business partners use or benefit from such practices. They are also responsible for monitoring and verifying the existence of these conditions within their supply chains. Should any of these practices be identified, they must be immediately reported, all commercial relationships shall be terminated, commercial sanctions shall be applied, and the competent authorities shall be duly notified.

## 6. Environment

Environmental protection is part of Be8's essence. The company values the relationship with partners who share and promote these principles, structuring and conserving in its productive chain business partners that act in accordance with environmental preservation and sustainable development.

### a) Compliance with environmental legislation

All of Be8's business partners must comply with the environmental legislation applicable to their type of activity and business. Environmental licenses and the required authorizations for the performance of activities must always be valid and up to date. Business partners are responsible for ensuring continuous compliance with all applicable regulations related to their activities.

### b) Environmental responsibility: climate change, resource use, and pollution

Be8 recommends and encourages all its business partners to be engaged in improving their practices and procedures, whether internal or external, aimed at the use of renewable resources, seeking to minimize environmental impacts in their operations, implementing measures to reduce pollution, and encouraging actions that contribute to mitigating climate change.



## 7. Ethic and integrity in the business relations

Integrity is part of Be8's values, guiding the company's behavior to act in an ethical and transparent manner. These guidelines are reflected in the selection of business partners.

### a) Transparency in business relations

Be8 relies on business partners that operate in a transparent, ethical, and consistent manner. Compliance with applicable laws and business regulations, continuous efforts to operate in accordance with such requirements, and the pursuit of best industry practices are behaviors valued by the Company. Be8 reserves the right to periodically assess such compliance and to select business partners that are committed to maintaining commercial relationships built on these business principles.

## b) Anti-Bribery and corruption, money laundering and fraud

Bribery, corruption, money laundering and fraud are unacceptable practices for Be8. Any conduct by our business partners that characterizes these practices is subject to the application of the applicable contractual and legal measures. Be8 and our partners may not pay, accept or offer bribery, engage in corruption, fraud documents or products, neither influence our suppliers, clients or partners to act in violation of the law. The practices described above are examples of prohibited conduct.

- **The offer of financial values, gifts, promises made directly or indirectly to Be8 workers or to other partners;**
- **Tax evasion, smuggling, and the practice of illegal conduct;**
- **Counterfeiting or forgery of documents, industrial products, or trademarks.**

Be8 requires its clients, suppliers, and other business partners to comply with applicable national and international anti-corruption laws and regulations throughout the entire value chain in which its partners operate or conduct business.

The Company complies with Law No. 12,846/2013, known as the Brazilian Anti-Corruption Act; the Foreign Corrupt Practices Act (FCPA); the United Kingdom Bribery Act (UKBA); and other applicable national and international laws related to bribery and corruption. The Company expects this requirement to be reflected by its business partners throughout their entire value chain.

## c) Data and information confidentiality and secrecy

Confidential information is information that must not become public, meaning it is subject to restrictions on access and disclosure. Such information may not be disclosed or made available, whether for personal benefit or for the benefit of third parties. Be8 expects its business partners to respect the secrecy and confidentiality of Be8's data and information, which include strategic business information, technical data, and commercial information, plans and budgets, internal actions, purchase volumes and conditions, financial and operational data, as well as any other information that may impact the Company's strategy and performance in the market.

Be8's business partners must also comply with applicable data protection laws in all markets in which they conduct business. Compliance with the applicable principles for the protection of personal data, its use solely for the legitimate purposes for which it was collected, and adherence to applicable privacy notices are expected conduct from clients, suppliers, and third parties that maintain relationships with the Company.

## d) Relationship with public officials

Commercial interactions with government entities are often subject to strict regulations and requirements, which we have a responsibility to comply with. Acting honestly, accurately, and transparently in all dealings with government officials, agencies, contractors, and subcontractors, while complying with all applicable anti-corruption and anti-bribery laws and regulations, is a duty incumbent upon all of Be8's business partners.

## e) Fair competition

Unfair, anti-competitive, antitrust, and monopolistic practices are intolerable to Be8. We believe that fair competition is beneficial to business and contributes to its growth. Knowledge of and compliance with competition and intellectual property laws are essential instruments for strengthening and driving our business and commercial relationships.

## 8. Stakeholder engagement

With the aim of contributing to the creation of a more sustainable, responsible world and of fostering more transparent and healthy business practices, we rely on the collaboration and engagement of our business partners to comply with this Code. The development and progress of our suppliers, customers, and third parties are also part of Be8's purpose and commitment.

## 9. Monitoring and audits

Be8 relies on a third-party due diligence process aimed at the continuous monitoring of the Company's business partners, in compliance with the standards and guidelines set forth in its Code of Conduct and in the Code of Conduct for Business Partners. The Company reserves the right to conduct audits and technical visits to its partners, as well as to offer courses and training programs to support their development.

## 10. Communicatio and questions

If you have any questions or concerns regarding this Code of Conduct or its application, please contact Be8's Compliance Department, which is available via email at [compliance@be8energy.com](mailto:compliance@be8energy.com) or by phone at +55 (54) 2103-7236.

If you feel more comfortable, we also provide a confidential Whistleblowing Channel, which can be accessed through the Company's official website. The Channel is available 24 hours a day and may be used anonymously, with non-retaliation and confidentiality of the report fully guaranteed. Access it at: [www.canalconfidencial.com.br/be8/](http://www.canalconfidencial.com.br/be8/).

Be8 also provides, on its website, a dedicated section that exclusively addresses the Company's Compliance Program. In case of questions, this may also serve as an additional source of information.

## 11. Good practices for your company

With the aim of supporting and fostering a more ethical and integrity-driven environment, we recommend the adoption of best practices that may be implemented within your organization, should measures to detect, prevent, and remediate non-compliances not yet be in place. Below are some practices that may assist you, as a business partner, in implementing measures of an Integrity and

<p><b>RISK MAPPING</b></p> <p>It consists of identifying the main risks to which the company may be exposed, considering its core business activities. In this process, risk factors are identified, as well as the practices that the company may adopt to mitigate them.</p>	<p><b>INVOLVEMENT OF SENIOR MANAGEMENT</b></p> <p>The commitment and example set by Senior Management are essential for the development of an Integrity Program. Senior Management is responsible for managing risks and assessing the effectiveness of the actions implemented.</p>
<p><b>WHISTLEBLOWING CHANNEL</b></p> <p>It enables the company to identify risks before they materialize. It is the mechanism through which customers, employees, and business partners can report illegal, unethical practices or actions that are not in compliance with the company's rules.</p>	<p><b>CODE OF CONDUCT</b></p> <p>É o documento que orienta o colaborador e o parceiro sobre quais são as regras da empresa e qual é o padrão de conduta esperado nas relações trabalhistas e comerciais.</p>
<p><b>TRAINING</b></p> <p>Continuous training is the means by which employees are guided and preventive measures are taken regarding the expected standards of conduct and the laws and company rules that must be complied with. Through continuous training, an ethical and integrity-driven culture is established.</p>	<p><b>HIRING OF THIRD PARTIES</b></p> <p>To conduct a prior assessment of business partners, verifying those with whom we do business are complying with their legal, tax, labor, and environmental obligations, thereby ensuring compliance and avoiding risks to the company.</p>
	<p><b>SUSTAINABILITY</b></p> <p>Identification of the most relevant social and environmental topics for implementation, in order to support the business in the long term.</p>

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