



Âmbar
ENERGIA



CODE OF
CONDUCT
AND ETHICS





CODE OF
CONDUCT
AND ETHICS



PRESIDENT'S LETTER

Âmbar develops and manages projects to contribute to the new challenges of expansion and diversification of the Brazilian energy matrix and to the socioeconomic development of the regions where we operate.

The responsibility for managing our business involves a wide range of people and companies, so that our relationships must be guided by the highest ethical values.

We believe that integrity, in its most absolute form, should be the fundamental standard of our conduct and the central focus for achieving our mission of “Being the best at what we set out to do”.

Inspired by our values, Âmbar's Code of Conduct represents our commitment to honest business conduct, being an important Governance instrument, and serves as a guide for understanding the conduct we should adopt in our daily activities. In addition, it provides the proper way to report any conduct that goes astray from what we believe.

Ensuring the opportunity for a better future for our employees is also part of our mission, and the path towards this achievement certainly involves improving our conduct and aligning our guidelines so that our businesses are increasingly more reliable.

I am certain that reading this Code and applying it will contribute to ensuring a healthy, dignified, and fulfilling work environment for all of us, and for Âmbar to better fulfill its role in society.

This is what we want and, therefore, we must all ensure that it is always respected.

Marcelo Zanatta Estevam

President of Âmbar

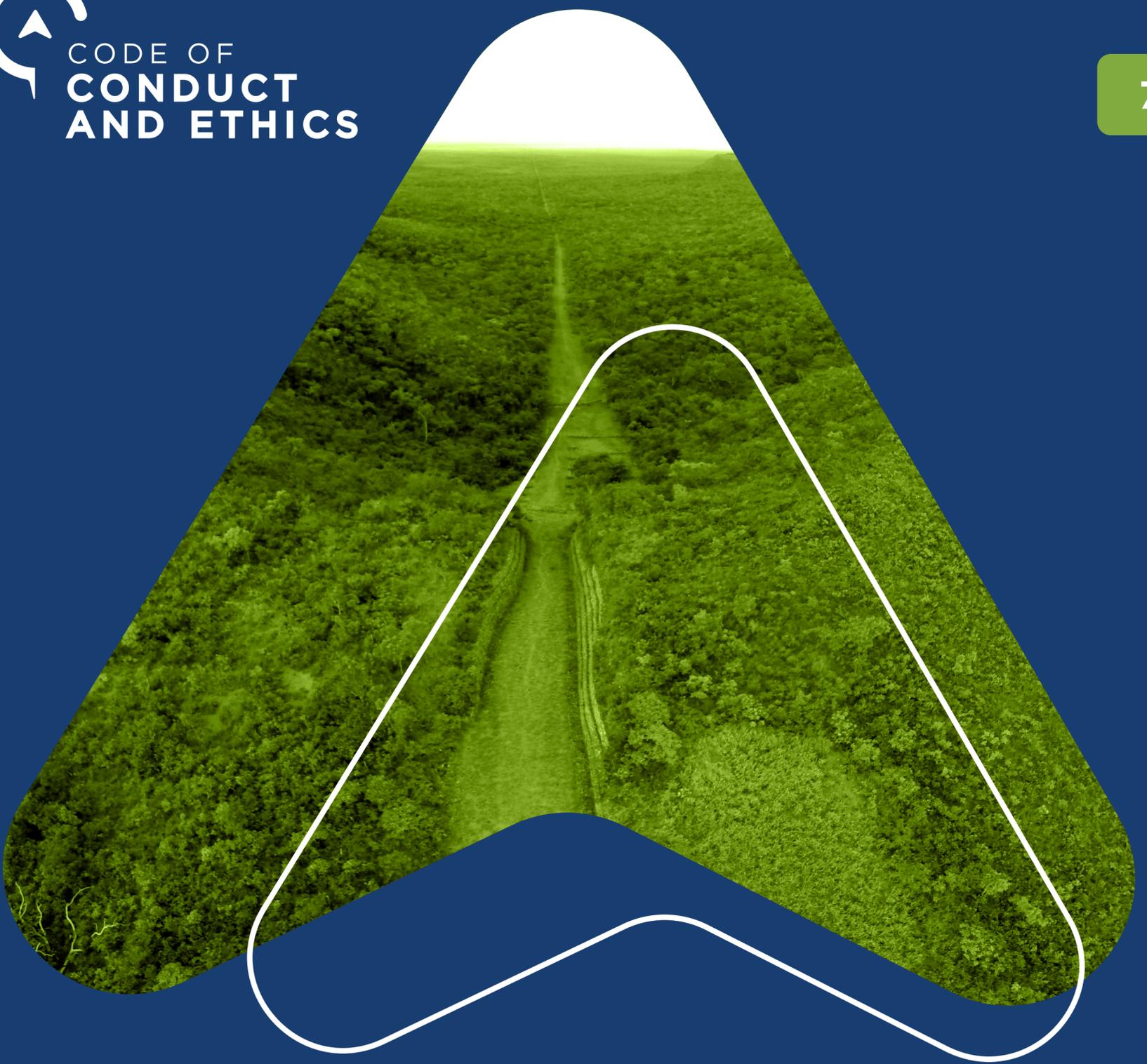
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1. INTRODUCTION

Âmbar is committed to conducting business ethically, with integrity and in compliance with applicable laws. Complying with the Code of Conduct (“Code”) and being aligned with Âmbar’s mission and values are mandatory conditions for all employees and third parties.

SUMMARY



1.1

OUR MISSION AND OUR VALUES



MISSION

“To be the best in all that we do, completely focused on our business, ensuring the best products and services to our customers, a relationship of trust with our suppliers, profitability for our shareholders and the opportunity of a better future for all of our team members.”



VALUES

- ✓ **Ownership**
- ✓ **Determination**
- ✓ **Discipline**
- ✓ **Availability**
- ✓ **Sincerity**
- ✓ **Humility**
- ✓ **Simplicity**

[SUMMARY](#)



1.2 DEFINITIONS

“Deviation of conduct” means any violation or suspected violation of this Code; of Âmbor’s policies, procedures, and processes; applicable laws; or regulations.

“Âmbor” consists of Âmbor Energia Ltda., Âmbor Comercializadora de Energia Ltda., Gasocidente do Mato Grosso Ltda., and Gasoriente Boliviano Ltda.

The term “leader” or “leaders” means any employee with responsibility for overseeing Âmbor’s business activities, or other employees, including members of the Board of Directors.

The term “employee” or “employees” means all Âmbor employees, hired for a fixed, indefinite period or internship.

The term “third party” means any business partner, outsourced company, supplier, service provider, self-employed, and related parties.

1.3 APPLICATION SCOPE

This Code is applicable to all employees and third parties.



1.4 RESPONSIBILITY OF EMPLOYEES AND THIRD PARTIES

Everyone must: (a) act ethically; (b) read, understand, and comply with the Code; (c) follow all applicable laws and regulations; (d) understand the policies, procedures, and processes applicable to their activities; and (e) complete all training and obtain the necessary certifications.

1.5 RESPONSIBILITY OF LEADERS

In addition to their responsibilities as employees, leaders are responsible for creating an environment that promotes compliance with this Code. Leaders must lead by example, being responsible for encouraging, as well as engaging their teams in complying with the Code's guidelines, demonstrating with conviction the correct application of the Code and Âmbar's policies. Monitoring the integrity of employees is as important as monitoring their performance. Leaders must also promote an environment where employees are encouraged to express opposing opinions and seek guidance and support regarding the Code, Âmbar's policies and ethical behavior.



It is the role of the leaders:

- Demonstrate, by word and deed, that ethics is paramount.
- Lead by example.
- Ensure that ethics always prevail, even if it conflicts with a business goal or objective.
- Ensure open communication, encouraging employees to ask questions about the mission, values, and the Code.
- Guide employees on the Code's guidelines to prevent unethical behavior.
- Upon becoming aware of a misconduct, immediately contact Compliance, Legal, or Human Resources (if applicable), and work in good faith with those departments in the event of an investigation.
- Recognize employees who report possible misconduct as defenders of the mission, values, and the Code.
- Avoid any form of retaliation against those who report a possible misconduct or collaborate with an investigation.
- Encourage employees to report violations of their knowledge, whether or not they are involved. If an employee confesses their own deviation, this attitude may be considered in any disciplinary proceeding.



1.6 PENALTIES FOR VIOLATIONS

Âmbar will not tolerate violations of this Code. Failure to comply with the Code or policies will subject the violator to disciplinary action, which may include fines, termination, and other consequences, as permitted by law.

In the case of third parties, the violation of any guideline contained in this Code, once investigated and verified, will constitute a breach of trust and may lead to the termination of the contract.

1.7 REPORTING INCIDENTAL MISCONDUCT OR QUESTIONS

If employees or third parties have questions about the Code or are aware of a possible misconduct, they should contact, preferably, via the Ethics Channel, or a leader, Compliance area, Legal area, or Human Resources.



Reporting concerns or complaints is a fundamental part of Âmbar's Compliance program. Âmbar wants to know all the concerns of employees so that it can have the opportunity to address them correctly. If an employee is aware of or suspects a violation of the Code, Âmbar policies, or the law, they must report such concerns immediately, unless prohibited by law. It is not necessary to know if a specific action is a violation, but it is necessary to raise concerns and report any situation that might be a violation. Employees must not delegate the task of reporting such concerns to others. Nothing in this Code prevents employees from reporting potential violations of law to government authorities.

The Ethics Channel is the tool through which any breaches of this Code, policies, internal procedures, and current legislation can be reported to Âmbar. In addition to reporting irregularities, the Ethics Channel can also be accessed for complaints, suggestions, doubts, and compliments. All calls will be directed and handled internally by an autonomous and impartial team, always with confidentiality and professional secrecy.

Everyone can access the Ethics Channel, which is available not only to Âmbar employees, but also customers, suppliers, service providers, partners, communities involved, or any citizen who wants to get in touch. Âmbar encourages its stakeholders to use the Ethics Channel in good faith, with responsibility and commitment to honesty to bring to the company's knowledge useful information to identify incidental irregularities.



The Ethics Channel is an important tool for Âmbar's Compliance program, working as follows:

- Reporting is carried out through communication channels (website, telephone, email, or directly to the company's Compliance professionals). The report may be anonymous or identified, at the whistleblower's discretion.
- A specialized and independent company will receive the report, will carry out a preliminary analysis and send the information for the appropriate handling by the Compliance professionals at Âmbar's.
- After a thorough and impartial analysis of the facts, the call is completed, and a response is recorded to the whistleblower.
- Always remember to write down the protocol number and monitor the progress of the open report, as well as provide additional information, if necessary or requested.

Collaborate with investigations

It is everyone's duty to cooperate with any internal or external investigations into an allegation of misconduct, and to provide honest and accurate information. Never change or destroy documents or evidence to impede or hinder any investigation.



Non-retaliation

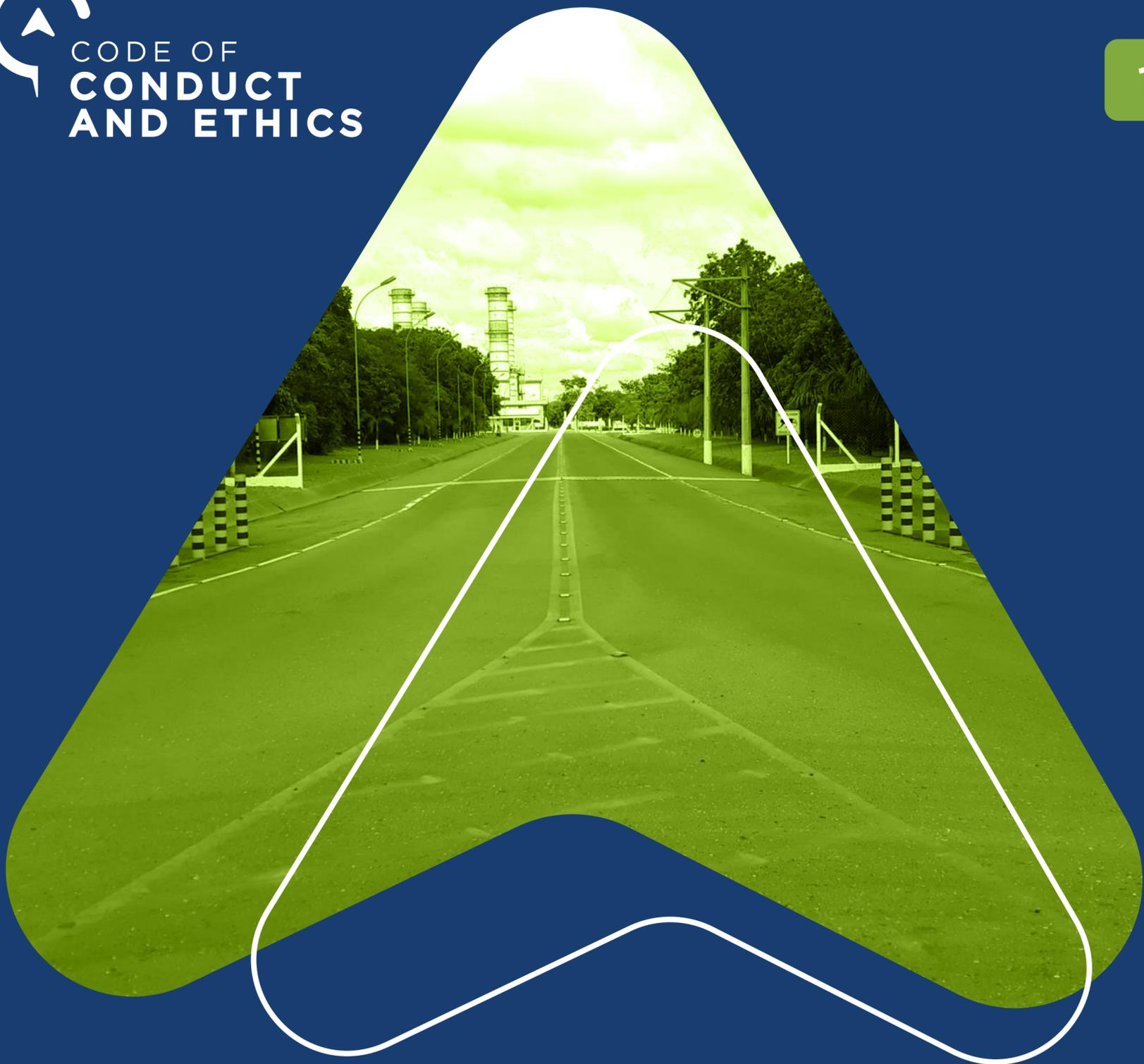
The handling of the complaint and the internal investigations will comply with the principles of objectivity, confidentiality, impartiality, and independence, and whistleblowers will be protected from any reprisal or negative consequences. Retaliatory acts will not be tolerated.

Contact us through the channels:

Website: www.canaldeetica.com.br/grupojf

Telephone: 0800 885 5608

E-mail: grupojf@canaldeetica.com.br



2. EMPLOYMENT PRACTICES AND WORK ENVIRONMENT

Âmbar's employment practices are guided by the commitment to treating all employees safely, in a respectful manner, and in compliance with applicable laws and regulations. Âmbar expects third parties to share the same principles of employment practices and work environment.



2.1 HEALTH AND SAFETY

Âmbar is committed to providing a safe working environment. Each employee is responsible for observing the safety rules and practices that apply to their work. Employees are also responsible for taking necessary precautions to protect themselves and their co-workers, including promptly reporting accidents, injuries, and unsafe practices or conditions.

Âmbar is also committed to providing a workplace free from the risks associated with the use of drugs and alcohol. Employees must work free from the use of any substance that could impair their performance or compromise safety in the workplace, such as illegal drugs and alcohol.

2.2 EQUAL EMPLOYMENT OPPORTUNITIES AND DIVERSITY AT THE WORKPLACE

Âmbar is committed to ensuring that all candidates and employees have the same employment opportunity, regardless of race, color, ethnicity, nationality, age, gender, religion, disability, sexual orientation, or any other situation protected by law. Âmbar also develops and maintains



a diverse and inclusive workforce, recognizing that a diverse mix of backgrounds, skills, and experiences maximizes our ability to achieve our goals and provides us with a sustained competitive advantage.

Âmbar will ensure that only legitimate work-related requirements and procedures are used with regard to recruitment, selection, promotion, transfer, and disciplinary measures, including termination, compensation, benefits, fitting, dismissal, training, and educational programs.

2.3 HARASSMENT

Âmbar is committed to providing a workplace free from violence and moral and sexual harassment. Âmbar will not tolerate the harassment of its employees. Harassment covers a wide range of behaviors of an offensive nature in verbal, written, or physical forms. Such behaviors, in addition to interfering with an individual's job performance, create an intimidating and hostile environment.



2.4

WORK BALANCE, LABOR AND IMMIGRATION RULES

Âmbar complies with all labor laws. Employees must never request that other employees or third parties violate these laws (for example: asking an employee to work for additional hours without paying them appropriately).

Âmbar recognizes the employee's right to participate in the political process or in any associations as an individual. However, employees can only participate in these processes outside working hours and using their own resources. Employees must not use Âmbar's time, resources, facilities, or assets to do so, as well as the company name without express written authorization.

Âmbar is also committed to hiring only individuals legally authorized to work in the country where they are seeking employment.

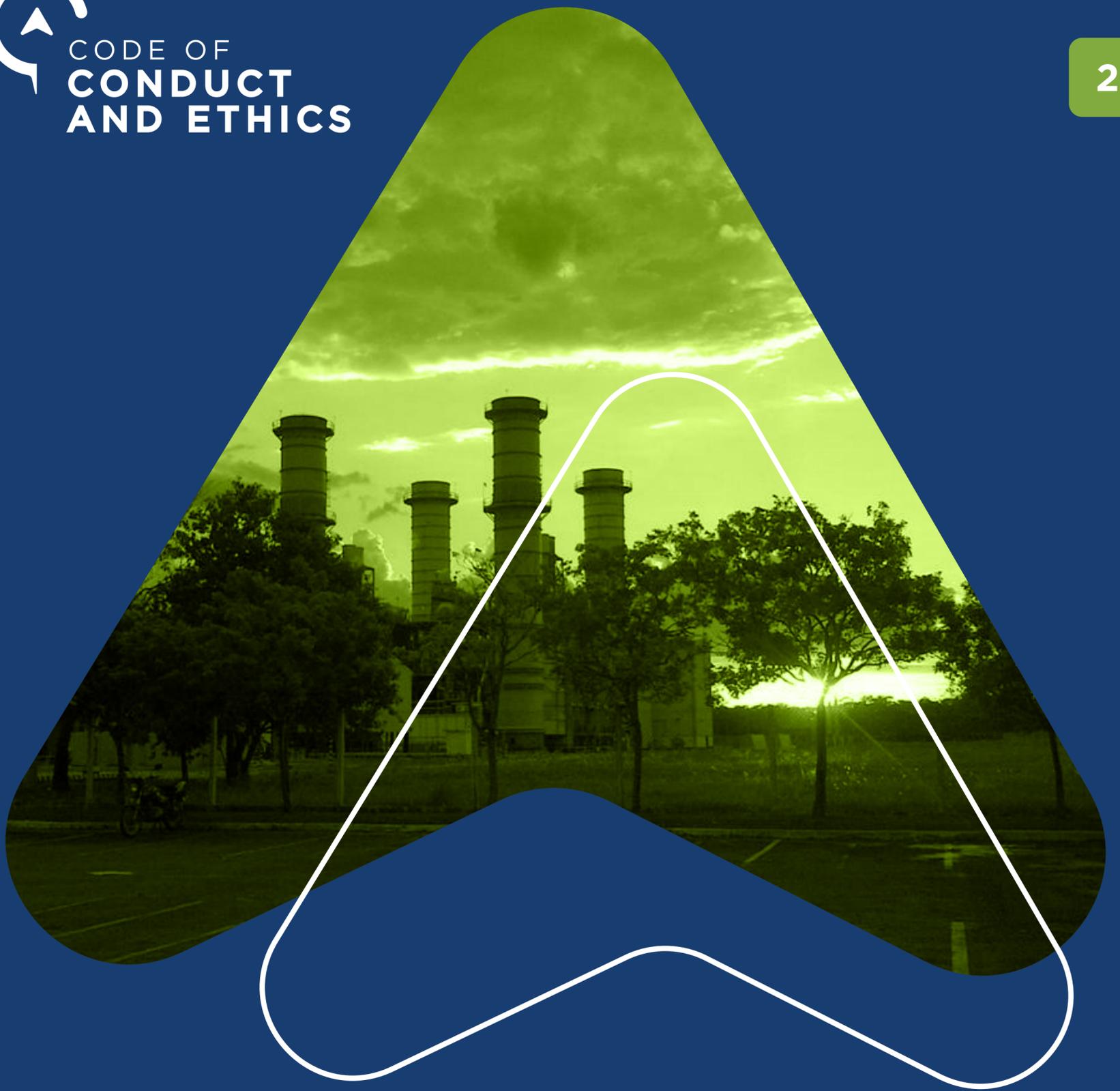
2.5

HUMAN RIGHTS

Âmbar prohibits the use of child or forced labor and will not tolerate the exploitation of children, physical punishment, and any form of abuse or conditions analogous to slavery.

All are equal before the law and, without distinction, are entitled to equal protection against any discrimination or incitement that violates the Universal Declaration of Human Rights.

SUMMARY



3. BUSINESS PRACTICES

Employees and third parties must conduct business in an ethical, fair, and transparent manner with customers, consumers, suppliers, and competitors.

SUMMARY



3.1 ENVIRONMENT AND SUSTAINABILITY

Âmbar operates in compliance with all applicable environmental laws and is committed to supporting the economic, social, and cultural development of the areas where it does business.

All Âmbar employees and third parties must respect the environment and use resources responsibly, including water, paper, and energy, without waste, thus acting with social and environmental responsibility.

3.2 CONFLICT OF INTERESTS

Employees must act in the best interest of the company at all times. A conflict of interest may arise when an individual's personal or professional interests are at odds with the best interests of Âmbar.

All employees must notify Âmbar of potential conflicts of interest of which they are aware.



3.3 RELATED PARTIES

Related parties are persons, individuals, or legal entities, which, directly or indirectly, control or are under the control of Âmbar or have influence over Âmbar. The relationship between related parties is common for business and business strategy, however it is necessary to observe the limits according to local legislation, avoiding any conflicts of interest and damages to Âmbar.

Transactions with related parties must follow market conditions and be carried out with transparency, always in Âmbar's best interest. Related party transactions may be subject to additional policies, procedures, and approvals.

3.4 PRÁTICAS ANTICORRUPÇÃO

Âmbar has zero tolerance for any kind of bribery or corruption. Bribery and corruption involve receiving, providing, offering, or promising, directly or through third parties, something of value to entities or agents, public or private, for the purpose of improperly influencing their actions or obtaining an improper advantage. Âmbar forbids anyone acting on its behalf to offer or receive bribes or improper payments.

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3.5 GIFTS AND ENTERTAINMENT

Offering corporate gifts and entertainment for legitimate business purposes must be reasonable and comply with Âmbar's internal policies. Offering cash or cash equivalents is not permitted. Gifts and entertainment involving public officials are subject to additional policies, procedures, and approvals.

Employees should not accept a gift if they believe that this action is intended to influence them or that it may, in fact, result in influencing a business decision. For more information on gifts and entertainment, see applicable policies.

3.6 POLITICAL CONTRIBUTIONS

It is forbidden to make, on behalf of Âmbar, any contribution in value, goods, or services to political campaigns or causes. The individual right of employees to be involved in civic affairs and to participate as citizens in political processes will be respected. However, this participation must take place outside working hours and, in this situation, it must be made clear that political manifestations are personal and not the company's.



3.7 PHILANTHROPIC DONATIONS AND SPONSORSHIPS

Charitable donations to non-profit entities and employees are permitted in limited circumstances, subject to applicable policies.

Donations and sponsorships involving public entities must comply with local legislation and be communicated to the Compliance area.

3.8 RELATIONSHIP WITH THE GOVERNMENT

Âmbar operates transparently in its interaction with public agents. Employees must avoid any interaction that could create the appearance of impropriety or otherwise unlawful. The practice of any type of fraud is strictly prohibited. Payments to government agents or authorities are prohibited, unless permitted by law and approved in Âmbar's governance structure.

Âmbar fully cooperates with inspection authorities, national or foreign, in all locations where it operates. If any employee receives a notification or is contacted by a public entity, the Legal Department must be immediately contacted.



3.9 HIRING OF PUBLIC AGENTS

Âmbar can only hire a current or former public agent, public servant or people related to them after duly verifying that the contract is permitted by law and does not create the impression that there is an improper purpose.

3.10 RELATIONSHIP WITH UNIONS

Âmbar respects the right to free association, collective bargaining or the formation of unions by employees. The management of union relations includes the provision of dialogue and transparent negotiation, based on mutual respect, compliance with applicable legislation, and the ethics and integrity guidelines contained in this Code.



3.11 RELATIONSHIP WITH THE COMMUNITY

Âmbar maintains permanent communication channels with the community, as it understands that this relationship allows knowing the particularities and needs of each community.

All means of communication on the Ethics Channel (website, telephone, e-mail) are available for interaction with the company. This openness is also reflected in actions and improvements for the community, such as initiatives in the health, education, and income generation areas through training activities. Local development with social responsibility is one of the pillars that guide Âmbar's actions, as the authentic and open relationship with the communities adds even more value to the business and provides gains for everyone involved.

3.12 PREVENTIVE MEASURES ON MONEY-LAUNDERING AND FINANCING OF TERRORISM

Âmbar complies with all anti-money laundering laws and discloses such information as required by law. Money laundering is an attempt by individuals or organizations to



conceal the outcome of their crimes by making them appear legitimate. Likewise, Âmbar also complies with rules to combat the funding of terrorism, when there is the purpose of causing social terror or endangering people or property, in addition to disturbing public peace.

All employees must be aware of suspicious activities for these purposes.

3.13

INTERNATIONAL TRADE CONTROLS

Âmbar complies with all laws relating to international trade, including economic sanctions and embargoes that restrict or prohibit trade and transactions with certain countries, organizations, entities, and individuals. Employees must take steps to ensure that international transactions are not prohibited by these embargoes.



3.14 BOOKS AND ACCOUNTING RECORDS

Âmbar maintains transparent, accurate, and complete accounting and financial records in compliance with the law, applicable accounting standards, internal controls, and accounting policies. False, misleading, or incomplete accounting records are strictly prohibited.

3.15 ANTITRUST AND COMPETITION

Âmbar is committed to a legal competition policy based on the merits of our products and services. We seek to satisfy our customers' needs rather than limiting our competitors' opportunities.

Employees must not engage in conduct that could reduce free and fair competition, such as agreements with other companies or manipulation of bidding processes. Employees must not offer, solicit, or exchange information with a competitor about prices, proposals, market shares, or other relevant information.

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USE OF ÂMBAR ASSETS AND ELECTRONIC COMMUNICATIONS

Âmbar provides its employees with the use of its assets, including credit cards, equipment, electronic devices and information technology systems, which must be used only for legitimate business purposes. Âmbar reserves the right to inspect, monitor, and control the use of these assets at any time, including e-mail systems and other forms of electronic communication. Any information generated, received, or stored in one of these systems is the property of Âmbar, and employees should not expect privacy when using them.

In addition, employees are prohibited from using Âmbar assets to promote inappropriate content and/or unrelated to their work.

3.17

USE OF CONFIDENTIAL INFORMATION AND DATA PROTECTION

All employees and third parties must ensure the protection of non-public information that they may have access to while working for Âmbar.



This information includes organization details, prices, profits, suppliers, customer, or employee data, among others. This confidential information can only be shared with people outside Âmbar if they are in accordance with internal policies and applicable law.

Specifically regarding personal data, Âmbar respects the privacy of its employees, customers, suppliers, and other third parties, using the data obtained only for legitimate business purposes, always observing the applicable legislation and related policies.

3.18 INTELLECTUAL PROPERTY

Employees must protect Âmbar's Intellectual Property (IP) and of third parties, such as copyrights, patents, trademarks, and trade secrets. To the extent permitted by law or contract, Âmbar will hold IP rights derived from the activities of employees while employed by Âmbar. Employees must not use IP rights inconsistently with Âmbar's proprietary rights.

**3.19****COMMUNICATION WITH
THE PRESS, SOCIAL
MEDIA, AND PROPRIETARY
CHANNELS**

Âmbaris committed to making transparent, accurate, and truthful communications to its publics of interest (stakeholders) and society in general. Employees must not interact with the press or speak on behalf of Âmbar, unless previously authorized and in accordance with applicable policies.

Âmbar respects the privacy and freedom of expression of its employees and third parties. However, social media must not be used to disseminate opinions or information on behalf of Âmbar. Any employee who uses social media must do so responsibly and compatible with Âmbar's values, in order to avoid a negative impact on the company's image and reputation.

No communication tools – website, podcast, intranet, corporate radio etc. – can be created in the name of Âmbar without the prior approval of the Communication area.



REFLECT ON YOUR DECISIONS

In certain situations, the proper outcome of decisions is obvious, and the decision can easily be made. However, in many situations, the appropriate outcome is not so clear, or we may face time constraints and pressures. In the face of a difficult situation, the following questions can help you make the right decision:

- 1.** Is it legal?
- 2.** Is it consistent with the company policies?
- 3.** Would I feel comfortable if it went public?
- 4.** Does it reflect Âmbar's values?

A “no” to any of these questions means that the action is unethical, inappropriate, or could have serious negative consequences for the company, and the employee and, therefore, should not be carried out. In case of doubt about the answer to any of these questions, consult the Compliance area.

ÂMBAR ETHICS CHANNEL CONTACTS

ÂMBAR COMPLIANCE

ÂMBAR'S ETHIC LINE

If the report is related to Âmbar, contact us through the channels:

Website:

<https://www.canaldeetica.com.br/grupojf/>

Telephones:

BRAZIL **0800 885 5608**

BOLIVIA **800 104 062**

E-mail: grupojf@canaldeetica.com.br

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