



Sustainable energy at your fingertips.

CODE OF CONDUCT



GDSun was born out of an entrepreneurial spirit and with the aim of promoting the energy transition of customers seeking more sustainable and economical energy models through our solar plants.

Since the beginning, GDSun has been building values and principles that begin and end in people's attitudes.

The Code of Conduct that we present represents these values and principles, reflecting the commitment to a responsible, ethical, transparent and respectful stance in all our relationships, actions and businesses.

It is a document that reflects our basic values and policies, a set of guidelines and a framework of moral and ethical conduct to guide our actions and decisions and that must be present in the company's relations with its employees, customers, suppliers, service providers, shareholders, government officials and communities.

We invite you to read, understand, clear your doubts and effectively use this guide as a valuable reference for your daily life.

Arthur Sousa
CEO

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PURPOSE AND SCOPE

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Our Code of Conduct (“Code”) is public and accessible by any person or company, regardless of the type of relationship existing with GD - GERAÇÃO DISTRIBUÍDA PARTICIPAÇÕES SA, its affiliates and direct and indirect subsidiaries (“GDSun” or Company”).

The Code was prepared to demonstrate the standards of integrity that we follow and demand for all our interactions, whether internal or external, as well as to guide the conduct of all our Employees.

The purpose of this Code is to reinforce the Company’s ethical values and the principles that guide the conduct of its activities, as well as to set general behavioral guidelines for Employees and standards of conduct to be followed during the performance of their activities.

GDSun expects any and all third parties acting in the interest or benefit of the Company (“Third Parties”) to follow our standards of integrity and encourages Third Parties to implement their own compliance programs consistent with the parameters set out in this Code.



MISSION, VISION AND VALUES

Mission: To contribute to the energy transition of our customers, through creative and sustainable models of distributed generation, fostering the growth and democratization of solar energy throughout Brazil.

Vision: To be the market leader and recognized as the best and most reliable partner in distributed solar energy generation solutions in Brazil.

Values: To act with integrity, ethics and transparency, respect for people and the environment, simplicity and austerity, always seeking results, refractoriness and a permanent search for excellence, innovation and creativity.

PILLARS GUIDING THE CODE CONSTRUAL

- Respect for institutions, laws and deadlines
- Excellence
- Innovation
- Ethics
- Responsibility
- Commitment to the result
- Efficiency
- Transparency

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HEALTH AND SAFETY

GDSun is committed to best practices for the health and safety of its Employees, as well as compliance with all applicable laws during the provision of our services.

We believe that every worker has the right to a safe and healthy environment, and for that we have made every effort to manage an effective EHS system, which allows for the anticipation of risks and directs efficient actions in the day to day of our operations.

The guidelines that permeate our management plan are described in the EHS Manual and Golden Safety Rules, and must be followed by all Employees and Contractors.

We are aware of our environmental responsibility and assume commitments with our operational practices, balancing the environmental impacts of our value chain with appropriate control and compensation measures.



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ESG

ESG-related topics guide our business and our commitment to society as a whole.

For this reason, when installing our solar plants, we use the best practices combined with state-of-the-art technologies, aiming at the least possible impact on the environment, safety at all stages of the operation and respect for labor rights. We operate in the diversification and expansion of the Brazilian energy matrix, with greater use of solar energy, a renewable source, helping to combat the impacts of climate change.

Allied to all this, we follow a management model with policies of good practices and transparency, with a focus on excellent corporate governance.

We chose to align our approach with the UN Sustainable Development Goals (SDGs), seeking to achieve prosperity for all and protect our planet.



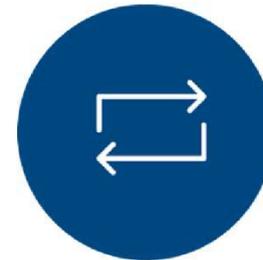
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CONFLICT OF INTERESTS

Conflict of interests occurs when there are differences between the Company's interests and the particular interests of Employees or Third Parties.

In the face of real or potential Conflict of Interest situations, the Employees' actions must be governed by the principles of loyalty, abstention and confidentiality, as well as the obligation to report internally any situation of possible Conflict of Interest or violation that is known to them.

Each of us must act with integrity, avoiding situations that could lead to the appearance of a conflict. These situations can negatively impact the trust others place in us and harm our reputation.



PROFESSIONAL CONDUCT

Employees represent the interests and carry with them the image and reputation of GDSun, inside and outside its facilities, both in the real world, physical, and in the virtual world. Therefore, we must always base our conduct on integrity and ethics.

Employees and Third Parties who violate our values or harm our reputation, even if they are not during office hours or even through digital means, incur a breach of professional decency and will be subject to disciplinary measures, including the potential for dismissal for cause and termination of contract.



FRAUD AND CORRUPTION PREVENTION

GDSun is committed to conducting its business with integrity, transparency and compliance with the law.

We do not condone any type of act of fraud or corruption, in the broadest sense of the term, including in our interactions with Government Officials and Private Players and any Third Parties with whom we have a relationship. When interacting with Public Officials, our Employees and Third Parties must act with the highest level of transparency and integrity.

Thus, Employees and Third Parties (acting on behalf of the company) are prohibited from:

A - promising, offering, giving or authorizing any Undue Advantage and/or Facilitation Payment, directly or indirectly, to a Government Official, or to any third party related to them, regardless of whether there is or there is not a consideration for such Undue Advantage;

B - preventing, frustrating, disrupting or defrauding, directly or indirectly, any form of bidding or government contract or any of its acts or procedures;

C - preventing or interfering with investigations or inspections by government authorities;

D - inducing or persuading, directly or indirectly, a Government Official to act or refrain from acting, improperly or illegally, on behalf of the interests of the Company.

All Company Employees and Third Parties who interact with Government Officials must read and put into practice our Anti-Corruption Policy.



MONEY LAUNDERING PREVENTION

“Money laundering” is an expression that designates the adoption of commercial or financial operations with the aim of hiding or disguising the criminal origin of goods, rights and/or amounts arising from the commission of a criminal offense, reintroducing them into the regular economy with a false appearance of legality.

The Company repudiates any and all practices that characterize or facilitate the commission of money laundering crimes, which is why it adopts internal prevention mechanisms and controls.

Any transactions or proposed transactions that, considering (i) the parties involved; (ii) the amounts; (iii) the mode of implementation; (iv) the means of payment; or (v) the lack of economic or legal basis, which may constitute serious indications of the occurrence of money laundering, must be promptly communicated to the Ethics Committee for the adoption of the necessary measures.

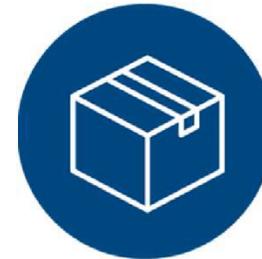


GIFTS, GRATUITIES AND HOSPITALITIES

Offering or receiving gifts, gratuities and hospitality is part of business relations, mainly as a way of promoting the brand. However, we do not allow these to be used as a way to unduly influence the decisions of those who are receiving them.

Additional care must be taken if the recipient of Gifts, Gratuities and Hospitality is a Government Official, as they may be considered as an Undue Advantage depending on the case and, consequently, violate the Anti-Corruption Laws.

The rules set forth by GDSun are described in the Anti-Corruption Policy. All Employees must always consult it when granting or receiving any Gift, Gratuity or Hospitality.



DONATIONS AND SPONSORSHIPS

GDSun can make Donations and Sponsorships, as long as they are transparent, in compliance with applicable laws and with proper accounting records.

Donations or any other compensation made within the scope of licensing processes or environmental authorizations are also allowed, provided that they are expressly referenced in the corresponding process or in an equivalent official document.

Donations and Sponsorships will be submitted to a prior diligence of integrity and GDSun will demand from the beneficiary institution, whenever possible, the proper use of the amount or material donated/sponsored.

GDSun does not make donations for political purposes, to any politician, political party or related organization, employee of a political party or candidate for public office, under any circumstances, whether directly or through its Employees or Third Parties.



INTERACTION WITH COMPETITORS

GDSun's principle is fair and loyal competition. Therefore, our Employees must act in the best interest of GDSun, independently of its Competitors, and in full compliance with the protection of free competition in the market.

It is prohibited for our Employees or Third Parties to combine prices, regardless of the form, or exchange competitively sensitive information (such as product or raw material price, market strategy, partaking in bids, sales policies and conditions, or any other information that influences our business strategy) with Competitors.

If our Employees identify any of the situations described above during legitimate interactions with Competitors, they must refuse to deal with the matter and, if possible, leave the location requesting the registration of their departure in the minutes, or, in the case of calls and remote meetings, choose to terminate the connection, immediately informing the Ethics Committee.



MERGERS, ACQUISITIONS AND CORPORATE REORGANIZATIONS

We are committed to investigating in detail the history, reputation, ethics and cultural values of any company or project we acquire or in which we invest, and any partner with whom we decide to enter into a business partnership (joint venture, consortium, etc.), and the nature of the investments that we will inherit in such relationship.

Failure to complete proper compliance and anti-corruption audits in connection with transactions may place GDSun at risk of criminal, administrative and/or civil liability for any prior or current bribery or dishonest conduct of business.



FINANCIAL AND ACCOUNTING CONTROLS

We maintain an accounting record system that fully and accurately reflects all transactions carried out, adopting principles and practices in compliance with applicable accounting standards.

Accordingly, all Employees must use their best efforts to ensure that contracts, invoices, reports, invoices and all other documents relating to the Company's income and expenses are accurate and truthful.



PROTECTION OF PROPERTY AND FUNDS OF THE COMPANY

It is the responsibility of all of us to ensure the integrity of GDSun's properties and assets, using them responsibly, avoiding damage, misuse and waste of resources, as well as misappropriation of assets and assets.

Employees must use the Company's assets, equipment and facilities exclusively to carry out their work and be aware that mobile devices, e-mails, corporate programs and systems, as well as the content contained or transmitted in corporate equipment and networks, such as files, e-mails and information created, received or stored are the property of the Company and must be classified and treated in accordance with applicable regulations and may be monitored at its sole discretion.

Likewise, under no circumstances should Employees and Third Parties share personal passwords to access corporate equipment and/or systems.



MEDIA AND SOCIAL MEDIA

GDSun seeks to maintain a relationship with all means of communication based on impartiality and truthful, clear, adequate and timely information. For that reason, Employees must follow the guidelines of this Code when participating in virtual communities or discussion forums, always adopting an upright and ethical posture and without linking personal communications and opinions to GDSun.

We value the ethical, safe and legal use of communication and interaction technologies, including social media. We repudiate the use of social networks to commit offenses, illegal acts, unethical or contrary to the conduct dealt with in this Code.

Employees must not post unauthorized messages or images about GDSun. Any manifestation may be inappropriate or generate misinterpretation, involving our brand and reputation.



HIRING AND SELECTION OF THIRD PARTIES

The hiring of Third Parties, whether suppliers of goods or services or service providers, must be done impartially, always prevailing the choice based on technical specifications and that best meets the needs of the Company. No Employee may influence the hiring of suppliers to benefit himself or a Third Party. All hiring must strictly follow the provisions of the Book of Procedures - Procurement, Hiring Third Parties, and Service Provision.

We must carefully monitor all Third Parties acting on our behalf. Third Parties acting on behalf of and on behalf of GDSun must operate in accordance with our standards and keep accurate records of all transactions.

We expect all Third Parties to comply with applicable law, the provisions set forth in this Code, as well as act in accordance with the Company's ethical and integrity values and standards.

Third Parties must ensure that their own agents, brokers, consultants, suppliers or service providers comply with the provisions contained in this Code.



PERSONAL DATA PROCESSING

Personal Data is information that can identify a natural person (for example: name, email, address, etc.). In the course of conducting its business, the Company may collect and process Personal Data from Third Parties.

The use and handling of Personal Data must be done responsibly to fulfill the proposed purpose in a proportionate and non-excessive manner. Also in this sense, Employees must not use Personal Data for discriminatory, illegal or abusive purposes.



DISCIPLINARY MEASURES

Violation of this Code, policies, procedures or current legislation may result in sanctions, which, depending on the seriousness of the facts, range from a verbal warning to termination of employment contract for Employees, or termination of agreements for Third Parties.

Any Employee who retaliates against anyone who has made a false report or who submits fake information or who withholds information during an internal investigation will also be punished.





WHISTLEBLOWING CHANNEL AND FREQUENTLY ASKED QUESTIONS

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In case of violation or suspected potential violation of this Code of Conduct, Employees and Third Parties may use the Company's whistleblowing channel, comprised of trained and independent professionals.

The whistleblowing channel is available via the internet and by telephone, with agents answering calls 24x7.

Complaints will be investigated by the Ethics Committee.

- Link: www.canaldedenuncia.com.br/GDSun
- Phone: 0800 300 4724

Complaints may be anonymous and will always be kept confidential. Whistleblowers will be protected from any and all forms of retaliation.

So that complaints can be properly investigated, they must be substantiated with basic elements for the identification of those involved and analysis of the facts, such as: approximate date of the occurrence, name and position/area of those involved, and the conduct practiced.