	ORGANIZATIONAL GUIDELINE	Reference	DO001-GIT99
	CODE OF CONDUCT COMPLIANCE POLICY	Review	03

CODE OF CONDUCT COMPLIANCE POLICY

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1 PURPOSE

This policy aims to establish general requirements for compliance with the Aegea Group's Code of Conduct.

2 APPLICATION


This policy applies to all administrators, employees, including organizational units, and business partners of the Aegea Group.

3 REFERENCES

- CODE OF CONDUCT OF AEGEA GROUP;
- CODE OF CONDUCT OF BUSINESS PARTNER;
- ISO 37301: COMPLIANCE MANAGEMENT SYSTEM;
- ISO 37001: ANTI-BRIBERY MANAGEMENT SYSTEM.

4 DEFINITIONS

- **CODE OF CONDUCT:** set of rules, guidelines and principles to guide and discipline the conduct of a certain group of people in accordance with their values;
- **CONDUCT:** behaviors and practices that impact results for customers, employees, suppliers, markets and the community;
- **COMPLIANCE:** fulfillment of all compliance obligations of the organization;
 Note 1: the term "compliance" originates from the verb, in English, "to comply", which means to comply, execute, satisfy and carry out what was imposed by the legislation and regulations applicable to the Aegea Group and its activities, in accordance with the Code of Conduct and organizational guidelines and procedures.
- **COMPLIANCE OBLIGATIONS:** requirements that an organization is mandated to meet, as well as those that an organization voluntarily chooses to meet;
- **NON-COMPLIANCE:** non-compliance with compliance obligations;
- **COMPLIANCE CULTURE:** values, ethics, beliefs and conduct that exist throughout the organization and interact with its structures and control systems to produce behavioral norms that contribute to compliance;
- **BUSINESS PARTNER:** external party with which the organization has, or plans to establish, some form of business relationship;
- **ADMINISTRATORS:** officers, directors and committee members;
- **EMPLOYEE(S):** all employees, apprentices, interns, officers, outsourced workers and other collaborators representing the Aegea Group who work in any of its organizational units;
- **SENIOR MANAGEMENT:** person or group of people who direct and control an organization at the highest level;
- **AEGEA GROUP:** Aegea Saneamento e Participações S/A, as well as its direct or indirect subsidiaries, regardless of the percentage of equity interest.

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- ORGANIZATION: person or group of people who have their own roles with responsibilities, authorities and relationships to achieve their goals;
- CONFLICT OF INTERESTS: it is the situation generated when the position in which the employee finds himself/herself benefits, directly or indirectly, personal interests that oppose those of the Aegea Group.

Potential risks of conflict of interest are not limited, but can be identified in the situations below:

- I) Existence of relatives in the same reporting line;
- II) Employee with some relationship, or with relatives in competing companies;
- III) Employees with equity interest in the company;
- IV) Relatives with decision-making power in companies with a commercial relationship with the Aegea Group.

5 DESCRIPTION

5.1 MISCELLANEOUS

The Aegea Group's code of conduct brings together the rules, guidelines and principles that must be observed and adopted by all companies that are part of the Aegea Group, guiding actions and relationships with internal and external audiences, based on ethical principles that guide the Aegea Group and support the image of a solid and reliable company, reflecting its cultural identity and the commitments assumed in the basic sanitation sector.

The Code of Conduct is applicable to all administrators, employees and business partners who work within the premises of our company or on its behalf.

Upon becoming aware of a possible violation of the terms hereof, it is up to each employee to communicate through the Ethics Channel, telephone **0800 591 0923**, website **<https://www.canaldeetica.com.br/Aegea/>** or formally to your immediate superior.


5.2 COMPLIANCE CULTURE

The Aegea Group develops, maintains and promotes a compliance culture at all levels within the organization.

The Board of Directors, Senior Management and managers must demonstrate and adopt an active, visible, consistent and sustainable commitment, through standard conduct and behavior, which is required of the entire organization.

Senior Management encourages behavior that creates and supports compliance, preventing and not tolerating behaviors that compromise compliance.

Administrators, employees, including organizational units, and business partners of the Aegea Group must:

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A) Comply with the policies, procedures, processes and compliance obligations of the Aegea Group;

B) Report concerns, issues and cases of non-compliance, as well as suspected or actual violations of the Compliance Policy or the compliance obligations of the Aegea Group;

C) Attend training as required.

5.3 HOW TO ACT IN CASE OF DOUBT


If you get in touch, are a witness or notice any type of eventuality that could violate our Code of Conduct, we advise you to report the case directly through the Ethics Channel or seek answers on how to proceed in this situation with your hierarchical superior, the Integrity Board or the Human Resources (HR). It is the duty of the information collector not to share his/her doubts with anyone who may have a conflict of interest with the situation. For example:

- If the employee believes that his superior is involved in an act of infraction, he/she should not speak with the perpetrator of the infraction himself to clarify doubts on how to proceed, but seek other options.

In most situations, the employee himself/herself can clarify his doubts using simple self-reflection questions:

- Does this act comply with the company's Code of Conduct?
- Is this an ethical act?
- Is this act lawful?
- Is this act impartial and honest?
- Is anyone or the Aegea Group itself being harmed by this act?
- Can negative evidence be created for the person who commits or committed the act or even for the Aegea Group itself?
- Does this act reflect benefit to me and the company?
- Would I like to read about this act in the newspaper?
- Would I advise my children to act this way?

At the end of the self-reflection, for any of the above questions, if there is an unwanted answer, which indicates the existence of a possible violation or risk of violation of the policies of the Aegea Group or of the legislation and regulations in force, then there are strong indications that the conduct in matter should not be adopted, and measures should be taken. The most appropriate is to make a report through the Ethics Channel, by phone at **0800 591 0923** or by website at **www.canaldeetica.com.br/Aegea/**

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5.4 RECEIPT AND COMMITMENT INSTRUMENT

The Aegea Group's Code of Conduct establishes requirements for the receipt and commitment instrument:

All administrators, employees and business partners are responsible for knowing, accepting, respecting and disclosing the information in this Code of Conduct, in addition to ensuring strict compliance with its provisions. They must also remain attentive to the prevention and detection of violations of this Code.

The term, which is attached to the Code, must be signed by administrators, employees and business partners, upon hiring, and delivered to the person in charge of HR, who will be responsible for controlling and archiving the duly signed term.

5.5 VALIDITY OF THE SIGNATURE OF RECEIPT AND COMMITMENT INSTRUMENT

The period of validity of the instrument is two (2) years.

Responsibility for renewing signatures on the receipt and commitment instrument, as well as the respective filing in the employees' medical records, rests with the Human Resources (HR) and/or Personnel Department (DP).

6 ANNEXES

- Not applicable.

7 RECORDS

IDENTIFICATION	STORAGE		PROTECTION	RECOVERY	RETENTION	DISPOSAL
	LOCATION	METHOD				
Receipt and Commitment Instrument	Personal folder of each employee	Physical Digital	Human Resources (HR) Personnel Department (DP)	Human Resources (HR) Personnel Department (DP)	At each new Signed Instrument	Destroy as soon as a new Instrument is signed