

DOMMO ENERGIA

Code of Conduct

Table of Contents

✦ Presentation of the Code of Conduct	03
✦ Conflicts of Interest	05
✦ Management Responsibility	07
✦ Relations with Stakeholders	09
✦ Work Environment	13
✦ Fraud and Corruption	16
✦ Gifts and Hospitality	18
✦ Health and Safety in the Workplace and Environment	20
✦ Management of the Code of Conduct	22
✦ Report Hotlines	24
✦ Statement of Acknowledgement and Commitment	27

Presentation of the Code of Conduct

Presentation of the Code of Conduct

Dommo Energia's Principles and Values and purpose of this document

Dommo Energia seeks to conduct its projects in an economically viable, environmentally responsible and socially fair manner. The Company appreciates the good corporate governance practices and values partnerships with reputable companies and institutions, in order to ensure the smooth operation of its activities and a friendly relationship with society and the public authorities.

In this sense, the Code of Conduct is a set of guidelines that reflects Dommo Energia's culture, and provides behavioral guidelines to manage conflicts of interest, prevent misconduct and embody the principles of transparency, equity, accountability and corporate responsibility within the scope of the Company's activities.

Dommo Energia's policies, rules and procedures, which establish specific rules for internal processes, must be strictly aligned with the guidelines of the Code of Conduct.

Scope

Dommo Energia's Code of Conduct is mandatory for all employees, in addition to Officers, Directors and Committee Members, who must be aware of its content and sign the term of commitment provided for at the end of this document. The Code should also serve as a reference for the conduct of our partners, suppliers, customers and shareholders, as well as affiliates and subsidiaries.

In agreements entered into with its suppliers and partners, the Company shall, whenever applicable, require the counterparty to act in accordance with the provisions of this Code of Conduct, subject to the penalties provided for non-compliance.

Conflicts of Interest

The background is a solid blue gradient. Overlaid on this are several thin, white, curved lines that intersect to form a series of overlapping, lens-like shapes. These lines are positioned primarily on the right side of the image, with one line curving from the top right towards the bottom left, and another curving from the top left towards the bottom right, intersecting in the upper right quadrant. A third line curves along the bottom edge, intersecting the others.

Conflicts of Interest

A conflict of interest occurs when a person is not independent in relation to a situation and/or matter under discussion, thus having his/her judgmental ability affected, and may also significantly influence or make decisions motivated by interests other than those of the Company, obtaining advantages for itself or for a Related Person.

Employees, managers and other stakeholders shall not engage in any activity involving a conflict of interest, by formally and timely expressing a conflict of interest or a particular interest, and abstaining from participating in discussions or decisions in which they are not independent. In addition, they shall report any situations involving a conflict of interest of which they are aware, even if they are not involved therein.

As an example (without limitation), the following situations are classified as a conflict of interest:

- ◆ Influence or make a decision in the Company that generates personal benefits for you or for a Related Person;
- ◆ Use inside information or provide such information to third parties for personal gain;
- ◆ Accept any kind of benefit from third parties, which may be perceived as compensation to obtain a favorable position before the Company;
- ◆ Use the Company's resources and assets to meet particular interests;
- ◆ Hire a Related Person, or force suppliers to do so, beyond the principles of authority and powers.

In case of doubt regarding the classification of a situation as a conflict of interest, the employee shall disclose the details to the Company's managers or to the Legal or Compliance areas, in order to obtain any necessary clarifications.

Management Responsibility

Management Responsibility

Management (the Board of Executive Officers and the Board of Directors), as well as the members of Advisory Bodies of Management, shall not conduct activities or engage in organizations that compromise their dedication to the Company's interests, or receive direct or indirect compensation from suppliers, shareholders or any other stakeholders of Dommo Energia.

They shall perform their duties in such a way as to always prioritize the best interests of the Company, in particular in case of conflict with the interests of shareholders or third parties. The manager undertakes to formally inform to management any existing or potential conflict of interest, including any requests made by shareholders in order for the manager to perform actions in which the interest of a shareholder overrides the interest of the Company.

With respect to the application of this Code of Conduct, the managers shall:

- ◆ Ensure that all employees are aware of its content and sign the respective term of commitment;
- ◆ Monitor its compliance;
- ◆ Encourage the submission of reports regarding its non-compliance through the Report Hotline; and
- ◆ Provide access to the information and tools necessary to investigate and handle any reports received.

Relations with Stakeholders

Relations with Stakeholders

Shareholders

Relationships with shareholders shall be based on accurate, equitable, transparent and timely communication of information that enables the monitoring and understanding of the Dommo Energia's activities and performance.

Related Persons shall be aware of and comply on a daily basis with the provisions of the Disclosure and Securities Trading Policy, as well as other guidelines for relationship with shareholders provided by Legal and Investor Relations areas (lock-up periods, confidentiality of Relevant Information, etc.).

The communication and provision of information to shareholders (as well as other stakeholders) is restricted to the Investor Relations area, and employees shall not make any kind of communication on behalf of the Company.

Public Authorities

Dommo Energia maintains a impartial, ethical and permanently open dialogue with all levels of governments of locations of where its businesses are conducted. In order to maintain its independence, the Company does not make contributions and donations to political activities of any kind.

Relations with Stakeholders

Suppliers

The processes for selection and contracting of materials and services shall be carried out in accordance with the Dommo Energia's procurement rules, and are based on technical and financial criteria, such as skills, quality, term and price. Business involving conflicts of interest is prohibited, as well as with suppliers or service providers that notably do not observe the provisions of this Code of Conduct.

Labor Unions

Dommo Energia respects the free association and the right to collective bargaining, recognizes labor unions as legal representatives of employees, and seeks to maintain an ongoing dialogue with them. Negotiations and discussions with labor unions, when made on behalf of the Company, shall only be made by the Legal and Human Resources areas.

Clients

Dommo Energia strives to strictly comply with all requirements established in agreements with its customers. The Company ensures that customer information is kept confidential, without exposition to third parties, unless this is part of an transaction, and subject to the consent of the parties.

Relations with Stakeholders

Professional Associations

Dommo Energia recognizes the importance of professional associations in the development of the industry. The participation of employees, as representatives of the Company, in steering committees of professional associations and the like, which has a major role in the market in which the Company operates, shall be designated by management.

Press

Contacts with the press shall be promoted exclusively by spokespersons appointed by Dommo Energia, with guidance from the Investor Relations area and the Board of Executive Officers.

There must be a commitment to the disclosure of information in a transparent and timely manner, with due regard to ethical and legal principles surrounding the relationship with the press, based on the Information Disclosure and Securities Trading Policy.

Unauthorized persons shall not contact the press or speak on behalf of Dommo Energia. Employees shall immediately forward to the IR area any press inquiries they may receive via email to ri@dommoenergia.com.br.

Any Dommo Energia employee, who publicly expresses themselves about the Company's or its subsidiaries' marketplace shall expressly clarify that their opinions and conclusions are their own responsibility, and do not necessarily reflect the Company's understanding.

Work Environment

The background is a solid blue color. It features several thin, white, curved lines that sweep across the frame. One line starts from the bottom left and curves towards the center. Another line starts from the top right and curves towards the center. A third line starts from the top right and curves more steeply towards the bottom right. These lines intersect to create a dynamic, abstract pattern.

Prejudice

Dommo Energia values diversity in working relationships. Therefore, everyone shall be given respectful, cordial and fair treatment, regardless of their position or function. The Company shall not accept discrimination or prejudice of any kind, whether of race, religion, age, gender, political belief, nationality, marital status, sexual orientation, physical condition or any other.

Harassment and Abuse of Power

Dommo Energia shall not accept harassment, such as sexual, moral or of any other nature, or situations that constitute disrespect, intimidation or threat in relationships between employees.

Moral harassment is characterized by submitting an employee to humiliating and embarrassing, reiterated and prolonged situations during the workday, and in the exercise of their duties.

Use of drugs, alcohol, tobacco and guns

Aiming at the well-being, safety and productivity of employees, the use of illicit drugs, alcohol and tobacco, as well as the carrying of weapons (except by persons legally authorized, responsible for the safety of other employees and the Company's assets) shall not be allowed in the workplace.

Assets of the Company

The Company's assets, equipment and facilities are exclusively for use in its operations, and may not be used for private purposes, except in specific situations defined by Dommo Energia. It is responsibility of the employees to ensure the proper use and maintenance of the Company's assets under their custody.

Issues related to donation, sale and assignment of use of the Company's assets shall be reviewed by the Legal area and authorized by the Board of Executive Officers.

Electronic and Information Systems

Internet and telephone access, as well as the use of Dommo Energia's emails, software, hardware and equipment, are provided for the proper conduct of the employee's professional activities, and shall be used mainly for such purpose, in compliance with the other provisions contained in the Company's internal regulations, such as the Information Security Policy. The occasional use of electronic systems and computer resources for personal matters is allowed, provided that it does not violate internal rules and guidelines, or jeopardize the conduct of the work.

Any exchange, redemption, storage or use of pornographic, violent, discriminatory or defamatory content, which violates any individual or entity, or which violates Dommo Energia's internal rules and interests is prohibited.

All data generated and maintained on Dommo Energia equipment and information systems shall be the sole property of the Company. Employees should be aware that the Company may have access to records of Internet access, email, data stored on computers and the use of mobile and fixed telecommunications facilities. Accordingly, the employee shall not expect privacy regarding these matters.

Fraud and Corruption

Fraud and Corruption

Fraud, for the purpose of application of this code, shall mean any intentional act or omission with the purpose of harming or deceiving another person, capable of resulting in loss to the victim and/or undue advantage, whether or not in properties, for the offender or third parties. It is also characterized by a false representation or concealment of material circumstances, in order to lead or induce third parties to error.

Corruption, for the purposes of application of this code, shall mean any action, direct or indirect, for authorization, offer, promise, solicitation, acceptance, delivery or receipt of improper advantage, whether economic or not, involving individuals or legal entities, public officials or not, for the purpose of performing or omitting a certain act.

Dommo Energia repudiates any and all form of fraud and corruption, at all hierarchical levels, and advises its employees, managers, suppliers and shareholders to:

- ✦ Reject and report situations of fraud and corruption whatsoever, direct or indirect, active or passive, whether or not involving monetary values;
- ✦ Do not imply, solicit, accept or receive, as well as promise, offer or pay a bribe, kickback or any kind of improper advantage;
- ✦ Not accept or support any initiative related to “money laundering” (a process designed to conceal or legitimize illicit financial resources), being aware of any unusual forms or complex payment patterns, unusual transfers to/from countries not related to the transaction in question operations that appear to have poor integrity, etc.
- ✦ Acknowledge and follow the guidelines of Law No. 12.846, known as Anti-Corruption Law, which provides for the administrative and civil liability of legal entities for acts against the national or foreign public administration.

Gifts and Hospitality


Gifts and Hospitality

It is well known that gifts and institutional invitations are common practices of kindness and cordiality usually accepted in a business relationship. In this sense, employees are allowed to in some occasions to accept gifts, as long as they: (i) have no relevant commercial value; (ii) do not be characterized as benefits in any negotiations; and (iii) are part of the communication strategy of the offeror, being distributed to other companies/people, and not exclusively to Dommo Energia.

Under no circumstances employees shall offer, give, solicit or accept from their customers, partners or suppliers: cash (or equivalent), personal services, loans and illegal items. Gifts and hospitality shall not be accepted during major business decision-making periods.

Any preparation of gifts for partners, customers and suppliers on behalf of Dommo Energia shall be approved in advance by the Board of Executive Officers.

Invitations for events or trips with expenses paid by customers, suppliers, governmental agencies and others stakeholders shall only be accepted where there is a real opportunity for development of business contacts, provided that such invitations were also made to professionals of other companies and upon authorization of the Board of Executive Officers.

The background is a solid blue color. It features several thin, white, curved lines that sweep across the frame, creating a sense of movement and design. These lines are of varying lengths and curves, some intersecting each other.

Health and Safety at the Workplace and Environment

Health and Safety at the Workplace and Environment



The health, physical integrity of employees and protection of the environment are priorities for Dommo Energia, above any economic or technical issues. The Company treats with transparency all health, safety and environmental information that may impact its employees, the communities or the environment itself.

All employees shall be familiar with Dommo Energia's health, safety and environmental policies, procedures and practices, and shall strictly comply with them in their daily activities.

Everyone is expected to closely observe the work environment, identifying potential risk situations and, if they do so, inform the leadership and the HSE area in a timely manner.

Management of the Code of Conduct

Management of the Code of Conduct

Elaboration and Review

In line with the good corporate governance practices, Dommo Energia's Code of Conduct is regularly elaborated and reviewed by a task-force composed of different areas related to the following issues: Compliance, Legal, Human Resources and Investor Relations, and approved by the Board of Executive Officers.

Disclosure

Compliance area is responsible for the wide disclosure and easy access to the Code, as well as for monitoring the employee compliance.

Questions / Suggestions for Improvements

Questions or suggestions for improvements related to the Code of Conduct should be submitted to the Company by email to ouvidoria@dommoenergia.com.br.

Report Hotlines

Report Hotlines

Dommo Energia considers the Report Hotline an important tool to strengthen the ethics, transparency and compliance of its activities. The Report Hotline is a means of direct and confidential contact of employees (and any other stakeholders) with the members of the Board of Directors. Its main purpose is to enable the report of fraud, irregularities or violations of the Code of Conduct, internal regulations and the legislation applicable to the Company's activities.

The whistleblower may choose to report anonymously or identified through the following channels:

- ✦ **Phone:** (21) 2196-4666 - available any day and time, it is linked to a “virtual” extension with no caller ID, which is automatically directed to a message recorder where the whistleblower may record their comments. Automatically (without manual intervention), the recordings are converted to audio file and sent via email exclusively to the members of the Board of Directors.
- ✦ **E-mail:** canaldedenuncias@dommoenergia.com.br – account accessed exclusively by members of the Board of Directors.

The reports are received only by the Board of Directors ensuring impartiality in the analysis and confidentiality of the information; anonymity to the whistleblower; professionalism in verifying the reports received; timely adoption of appropriate measures, after the findings of fact.

Report Hotlines

Reports may be made by any stakeholder who experiences, witnesses or becomes aware of any acts that violate the Code of Conduct, internal rules and legislation applicable to the Company's activities. These include employees, subcontractors, suppliers, shareholders, trade and labor unions, competitors, among others.

In order to enable the members of the Board of Directors to ascertain and take effective measures in relation to the report, it is important to report giving as much detail as possible. Thus, according to the applicability and possibility, the whistleblower shall inform dates, names of parties involved, amounts, supporting files (evidences), witnesses, possible complementary sources of information, etc. The provision of details helps the report investigation. Please note that any report is valid and shall be verified, even if the whistleblower is unable to provide all of such information.

If the whistleblower opts for an identified report, it is important to provide their contact details so that they can be accessed for further clarification, if necessary. The whistleblower shall have his or her identity preserved. It is worth noting that the whistleblower identification is optional - anonymous reports must also be made and shall be equally considered and clarified.

The background is a solid blue color. It features several thin, white, curved lines that sweep across the frame, creating a sense of movement and depth. These lines are not perfectly straight, following gentle curves that intersect and overlap.

Statement of Acknowledgment and Commitment

Statement of Acknowledgment and Commitment



I declare, for all purposes, that I have become aware of the provisions of Dommo Energia's Code of Conduct and undertake to fully comply with them in all situations that are directly or indirectly related to the relationship between me, or the company represented by me, and the Company. I further declare my commitment to be aware of and follow any new versions of the Code made available on the corporate Intranet and at Dommo Energia website.

Name: _____

Local and date: _____

Signature: _____