

April 15th 2021

COMMITMENT LETTER BY TOP MANAGEMENT

GranEnergia Inverimentos SA ("GranEnergia") and its Top Management, hereby, reiterate their constant commitment to ethics and integrity and reinforce the importance of compliance by all Members and Third Parties with the Policies, Guidelines and the Code of Ethics and Conduct those are part of GranEnergia's Compliance and Anti-Bribery Program.

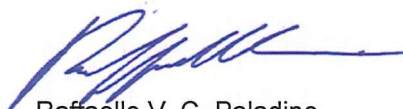
It is important to remember that we will always be acknowledged based on our attitudes and the level of trust and honesty that we are able to deal with to the people whom we have relationship.

GranEnergia and its Top Management, therefore, count on the commitment of all Members and Third Parties, without exceptions, to comply with the GranEnergia Compliance and Anti-Bribery Program, as well as all legal requirements applicable to GranEnergia, according to Annex I to the present.

Our commitment is to grow in a sustainable way, guided by a consistent, ethical, and transparent conduct.



Miguel de Almeida Gradin
Director President



Raffaello V. C. Paladino
Director



Ricardo Rodrigues Orofino
Director

GranEnergia Inverimentos S.A.



ANNEX I
COMMITMENT LETTER BY TOP MANAGEMENT
MAIN APPLICABLE LEGAL REQUIREMENTS

The list below is not exhaustive and provides the main rules and legislation applicable to the activities of GranEnergia Investimentos S.A. regarding the best anti-corruption and anti-bribery practices in Brazil.

Item	Type/ Number /Date	Subject
L-1	Law nº 12.846/2013	Anti-corruption Law
L-2	Law nº 9.613/1998	Money Laundering Prevention Law
L-3	Resolution COAF 16/2007	Replaced by Resolution Coaf 29/2017
L-4	Resolution COAF 29/2017	PPE – Politically Exposed People.
L-5	Law nº 8.666/1993	Bidding and Contracts Law
L-6	Law nº 14.133/2021	New Bidding and Contracts Law
L-7	Decree nº 5.687/2006	Standard of Accession to the United Nations Convention to Combat Corruption
L-8	Guideline CGU, Sep/2015	Integrity Guideline Program
L-9	Guideline CGU/MP 01/206	Internal Controls and Risk Management, Relationship with the Federal Public Entity
L-10	Decree nº 8.420/2015	Regulates Anti-corruption Law (Lei nº 12.846/2013)
L-11	Ordinance 909/2015, CGU	Evaluation Standard for the Legal Entity Integrity Program
L-12	Ordinance 910/2015, CGU	Administrative Responsibility Process and Assessment
L-13	Law nº 12.529/2011	Competition Law – CADE
L-14	Decree-Law nº 2.848/1940	Penal Code
L-15	Supplementary Law nº 135/2010	Amends Complementary Law 64/1990, which establishes cases of ineligibility, termination periods and determines other measures
L-16	Law nº 8.112/1990	Legal regime for public officials, municipalities, and federal public foundations
L-17	Law nº 8.429/1992	Sanctions applicable to public officials in cases of illicit enrichment