

1 PURPOSE

GNA aims to act in energy and gas structural projects, developing people, creating opportunities, and respecting the environment. Sustainability is an essential part of its business and is committed to promote the UN Sustainable Development Goals (SDGs) through the guidelines set out in this policy.

2 SCOPE

This standard applies to Gás Natural Açú S.A. and its subsidiaries (GNA).

3 PRINCIPLES AND GENERAL GUIDELINES

3.1 Integrated Management System

- i. Maintain a management system designed to continually improve company's performance.
- ii. Establish a systematic, independent, and authentic method of auditing to improve the performance of internal processes.

3.2 Natural Resources

- iii. Promote the efficient use of natural resources, considering activities magnitude and its environmental and social aspects.
- iv. Encourage the development and use of environmental innovations that promote the rational use of water resources and energy efficiency.
- v. Establish control and monitoring mechanisms for the use of natural resources to benefit of biodiversity and climate.

3.3 Climate Change

- vi. Monitor, report, and verify greenhouse gas emissions during operations, maintaining its inventory related to scope 1, 2 and 3 updated.
- vii. Identify and assess activities' vulnerability to climate change to manage risks and opportunities and implement adaptation strategies.
- viii. Ensure power generation on a reliable and safe basis to support renewable sources expansion as natural gas is the main fuel for the transition to a low carbon economy.

3.4 Biodiversity

- ix. Implement national and international performance standards for the protection and conservation of biodiversity values and its sustainable use.
- x. Follow the mitigation hierarchy in all project phases to avoid, minimize, restore, and compensate impacts on biodiversity by carrying out adaptive management practices, as needed.
- xi. Identify protected areas within the affected region or its vicinities, consulting their managers and developing activities only in legally permitted areas.
- xii. Adapt, where applicable, its programs to promote the conservation and proper use of the protected areas affected by GNA.
- xiii. Prioritize forest restoration in conservation units of the affected region.

3.5 Human rights

- xiv. Respect and safeguard human rights from any form of violence, harassment, exploitation, and discrimination.
- xv. Prevent any forms of child labor, forced labor and/or slave labor in GNA's activities.
- xvi. Establish practices to prevent and control any type of human rights violation in the affected communities, in GNA and its contractors.

3.6 People and communities

- xvii. Act as a sustainable development agent in its area of influence, respecting local culture, knowledge, and practices.
- xviii. Properly manage engagement with stakeholders, through a transparent and regular dialogue, to maintain relationships of mutual trust and understanding.
- xix. Ensure that indigenous people and traditional communities are respected in their cultural specificities and consulted in a free, prior, and informed manner.
- xx. Implement actions to prioritize the hiring of workforce and suppliers in the region where its activities are inserted.
- xxi. Promote development opportunities for GNA employees and establish mechanisms for the construction of a work environment based on respect and dialogue.

3.7 Diversity and inclusion

- xxii. Value diversity and social inclusion, engaging in efforts to foster equity and seeking equality of opportunities, promoting a work environment in which all people feel safe and respected.
- xxiii. Establish practices and mechanisms to restrain any form of discrimination based on ethnicity, race, gender, sexual orientation, gender identity, age, appearance, religion, or opinion.

3.8 Health & safety

- xxiv. Commitment to a zero-accident culture to attain the goal of no harm to people, environment, assets, and business continuity.
- xxv. Promote operational excellence and safety culture through visible leadership commitment.
- xxvi. Ensure physical and mental integrity of workers and implement tools to identify, prevent and monitor hazards and risks.
- xxvii. Develop workers' skills to carry out their activities in an efficient and safe manner.

3.9 Impacts and risks

- xxviii. Uphold operational efficiency through proper management of waste, effluents, and air emissions.
- xxix. Establish a continuous process to identify aspects and evaluate social and environmental impacts to minimize negative impacts and maximize opportunities for positive impact.
- xxx. Promote the identification of hazards and assessment of risks related to health and safety, comprising workers consultation and participation to prevent undesirable effects.
- xxxi. Maintain stakeholders informed about the identified hazards and assessed risks in GNA's activities.

xxxii. Ensure that risk management is an essential part of all organizational processes with the purpose of improving performance regarding people health & safety, asset integrity, legal and regulatory compliance, public acceptance, environmental preservation, product quality, project management, operational efficiency, governance, and reputation.

3.10 Emergency

xxxiii. Ensure all potential scenarios for emergency preparedness and response plans are identified through hazard and risk studies.

xxxiv. Ensure material and human resources to rapidly respond to emergencies.

xxxv. Conduct training and simulated exercises to keep workers in condition to face real emergency situations.

xxxvi. Act cooperatively and organized with companies and public agencies in mutual assistance plans, joining resources from site-specific emergency preparedness and response plans.

3.11 Crisis

xxxvii. Manage events that have the potential to severely impact GNA's operation, brand, image, reputation, market share, ability to do business, or engagement with key stakeholders, through crisis management plans.

3.12 Business continuity

xxxviii. Secure operations continuity by controlling operational vulnerabilities, seeking to reduce impacts on critical activities.

xxxix. Establish a process to improve the ability to remain effective and secure during operational disruptions and build organizational resilience.

3.13 Management of Change

xl. Ensure that project, process, product, and service changes are properly evaluated from an economic, social, environmental, health and safety point of view.

3.14 Legal Requirements

xli. Identify and control compliance with legal requirements applicable to the activities, including the conditions of the project licenses and authorizations, through the Compliance Task Management System.

xlii. Ensure that activities will only start upon applicable permits issuance.

3.15 Integrity

xliii. Act with responsibility, ethics, and transparency, ensuring compliance with good conduct practices and anti-corruption policies.

xliv. Set forth, disclose, and monitor the adoption of measures to assure compliance of established standards and practices.

xlv. Act in an ethical and transparent manner through the adoption of fair operating practices, providing timely, accessible, and appropriate information to the specificities of the various audiences and stakeholders.

3.16 Suppliers

- xlvi. Request suppliers to adopt and maintain practices compatible with the precepts of this Policy.
- xlvii. Evaluate supplier compliance of sustainability requirements through contractor management and assurance plans.
- xlviii. Ensure proper labor and working conditions for GNA supplier's workforce, throughout the value chain.

4 STANDING AUTHORITIES

Role	Name	Position
Drafter	Luiza Volschan	Environmental Analyst
Drafter	Herman Neto	Social Responsibility Analyst
Reviewer	João Teixeira	Sustainability General Manager
Approver	Administration Council	-

5 REVIEW CONTROL

Issuance	Review	Description of Amendment
12/08/2019	00	Original Version
02/02/2022	01	Total revision of the policy to include aspects not covered in the first version.