



CODE OF CONDUCT

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Developed by:

GNA | Gás Natural Açú

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Introduction

The principles and concepts defined in our Code of Conduct represent the commitment undertaken by Gás Natural Açú S.A. (“GNA” or “Company”) and by all of its subsidiaries and staff members in compliance with the highest levels of ethics and integrity. Our Code of Conduct shall direct all of GNA’s relationships and serve as our common basis for ethical conduct and cultural interaction amongst all of our staff members, including directors, board members, committee members, employees, interns and apprentices. And we, as staff members, shall ensure that this Code of Conduct is communicated to every partner, customer, supplier and other third parties with which GNA does business.

All staff members in their daily tasks and while performing their professional activities are responsible for acting in accordance with the guidelines defined in this Code of Conduct. Everyone is responsible for complying, implementing, spreading and inspecting compliance with our Code of Conduct and for creating a more equitable and efficient business environment in which GNA is active.

By basing our daily conduct under the principles established in our Code of Conduct, we establish a solid foundation for GNA stakeholders to maintain pride, ethical behavior and a just and fair work environment free from corruption.



We believe that these values are the path to ensure continuity and sustainability in our business.


1. APPLYING THIS CODE

This Code of Conduct (“Code”) shall be read and complied with by all GNA’s and its subsidiaries’ officers, directors, committee members, employees, interns and apprentices (hereinafter referred to simply as “Staff Members”).

In the case of companies of which GNA does not own or share control, this Code shall be made available to GNA’s business partners, enabling the full adoption of its guidelines.

In addition, Staff Members shall convey the principles and standards of conduct contained herein to our partners, suppliers (including contractors and sub-contractors), customers or any other persons, entities, authorities and third parties (“Third Parties”) with which GNA has relationships.

Further to the procedures that shall be followed by Staff Members prior to retaining Third Parties, such Third Parties shall also adhere to this Code or, alternatively, present a written commitment to adopt conduct standards equal to or more stringent than the provisions established herein.



2. WHISTLEBLOWING CHANNEL

GNA's whistleblowing channel ("Whistleblowing Channel") shall be used to report violations of this Code, laws, regulations and the Company's internal rules and may be accessible to Staff Members and Third Parties and the community.

It is very simple to use the Whistleblowing Channel. A person may place his/her report through the phone number or website that follow:



0800 721 5965

Free call



gna@canaldedenuncia.com.br



www.canaldedenuncia.com.br/gna

Access to the Whistleblowing Channel, either by telephone or Internet, is free of charge and is available 24 hours per day, in English and Portuguese.

Furthermore, persons don't need to provide their names if they choose not to. The Whistleblowing Channel is confidential and is managed by an independent company, which assures anonymity to the reporting party.

The Whistleblowing Channel will submit reports of violation to the GNA Compliance Officer, who will be in charge of investigating the facts and applying the penalties that may be reasonably required, pursuant to this Code. Whenever necessary, the GNA Legal Department shall provide the required support to address the violation reports together with the GNA Compliance Department.

GNA ensures that Staff Members or Third Parties making a report will not be harmed. GNA will not allow any type of retaliation as a result of a report or lawful notice of a suspicion or concern by means of the Whistleblowing Channel. If any Staff Member experiences retaliation, he/she shall contact the Compliance Area. For the purpose of this Code, a retaliation occurs when an employer punishes an employee for engaging in legally protected activity – in this case, the usage of the Whistleblowing Channel –, which includes any negative reaction to the job's role or assignments such as demotion, discipline, firing, salary reduction or job or shift reassignment.

3. COMPLIANCE WITH LAWS AND GNA'S INTERNAL RULES

Whenever applicable, all Staff Members and Third Parties shall comply with the laws and regulations applicable to their activities, as well as GNA's policies and internal procedures, and shall also participate in mandatory training courses provided by the Company and comply with annual certification that they have acted in accordance with this Code.

Though differences may occur between cultural conditions or usual market practices, Staff Members must comply with this Code's principles and notions, existing internal rules as well as laws and regulations.

Should a Staff Member on occasion come across a more restrictive legislation than an internal rule's guidance adopted by GNA, **that Staff Member shall comply with what the legislation requires and shall inform the Process Management area of the need to review the mentioned rules.**

Any Staff Member who is aware or suspects some form of non-compliance with this Code or with laws, regulations or GNA's internal rules is expected to report such without delay to GNA through the Whistleblowing Channel. All Staff Members shall fully co-operate when responding to an investigation or audit.

We must remind managers that a culture of ethics and integrity in a company starts at the top. Therefore, all managers must fulfill their duties of supervision and bear responsibility for all Staff Members entrusted to them.

Managers must earn respect by commendable personal behavior, performance, openness and social competence. This means, among other things, that each manager must emphasize the importance of ethical conduct, make it a regular topic of everyday business and promote it through personal leadership. Managers shall also be accessible in case any Staff Member entrusted to them choose to raise compliance concerns, ask questions or discuss a professional or personal problem.

However, the responsibilities of managers do not relieve any Staff Members of their own responsibilities to comply with the laws and regulations applicable to their activities, as well as GNA's policies and internal procedures.

In event of any uncertainties regarding the lawfulness of conduct, the Compliance Area is always available to provide further explanations.

GNA values the unique contribution that each person brings to the Company.

4. WORK ENVIRONMENT

GNA has zero tolerance for sexual harassment. For the purpose of this Code, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature.

Acts of gender-based violence that result or is likely to result in physical, sexual or mental harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life are not acceptable.

Additionally, GNA will not tolerate any form of disrespect to Staff Members' possessions nor physical violence, threats or any actions likely to constitute a violation of human rights. Offensive messages, derogatory remarks and inappropriate jokes are never acceptable.

We aim to facilitate a work environment free from restraints, inappropriate insinuations or discrimination of any nature, due to race, color, national origin, religion, gender or sexual orientation, gender identity, social class, marital status, age, weight, height, physical handicap or any other personal or ideological features.

Staff Members shall always act in a courteous and respectful manner, regardless of hierarchical position, office or activity. GNA will not tolerate any discrimination in the hiring, promotion, termination or any aspect of the work process.

GNA encourages its Staff Members to report any kind of violence on the Whistleblowing Channel. Staff Members that fail to comply with the provisions of this Code will be subject to disciplinary measures compatible with the conduct practiced.

4.1. HEALTH, SAFETY AT WORK AND THE ENVIRONMENT

GNA's health, safety, security and environment goals are: **no accidents**, **no harm to people** and **no damage to the environment**.

GNA is committed to avoid damage to the environment and related impacts on communities. When performing their professional activities, all Staff Members and Third Parties shall be aware of and comply with requirements regarding environmental protection, occupational safety and their own health, and shall also act responsibly, without violating laws, regulations or environmental protection, health and occupational safety standards.

GNA ensures its Staff Members have the right to refuse performance of activities or tasks, should a Staff Member discover such tasks or activities lack sufficient safety standards and conditions. If any Staff Member observes an unsafe or unhealthy working environment he/she shall immediately stop work and contact the Whistleblowing Channel.

GNA does not allow its Staff Members to work under the influence of unlawful drugs or alcohol. Use of alcohol and unlawful drugs, besides being harmful to health, may place the safety of Staff Members and their colleagues at risk.

In case of accidents or inspections, Staff Members shall immediately inform the areas in charge of occupational and/or environmental safety.

4.2. SOCIAL RESPONSIBILITY

All Staff Members shall comply with their social responsibility and be concerned for GNA's good standing, through the timely exercise of their civic duties and by performing quality and productive work.

In this regard, they shall act with a view to providing good services, avoid being wasteful and respect the environment, cultural values, human rights and social organizations in their communities. The development of an open and ethical outlook together with respect for diversity, local cultures and customs provides for beneficial results and outcomes.

GNA seeks to conduct its business in a manner that respects the human rights and the dignity of people, ensuring freedom from harm from GNA's activities. GNA will not tolerate any human rights abuse, such as child labor, human trafficking and forced labor and will require its Staff Members and its contractors, subcontractors and suppliers to treat individuals and communities within GNA's area of influence with respect. Any violations of human rights in GNA's operations shall be immediately reported on the Whistleblowing Channel.

4.3. STAFF MEMBERS' RIGHTS

GNA acknowledges and respects Staff Members' right of free association, permitted by law. Workers' right to open communication, direct engagement, humane and equitable treatment must be respected at all times. GNA also respects the legal right of workers to bargain collectively.

Additionally, GNA provides a grievance mechanism to enable its Staff Members to raise reasonable workplace concerns. Such mechanism provides a confidential, comprehensible and transparent process and guarantees that Staff Members who raise a complaint will not be subject to any retaliation.

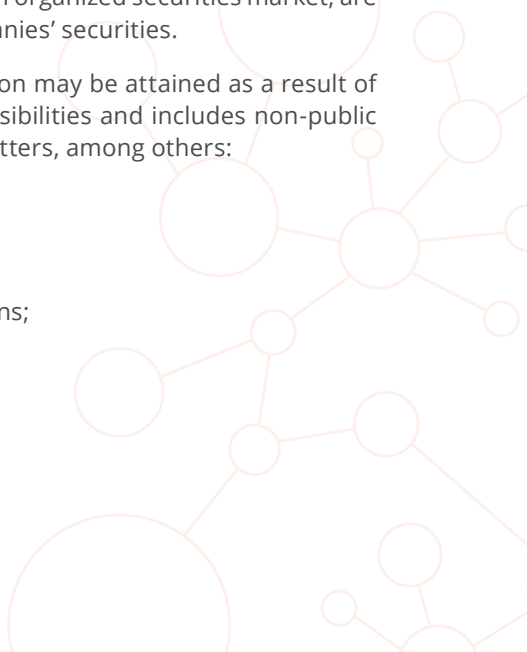
5. CONFIDENTIALITY AND PRIVILEGED INFORMATION

All Staff Members shall maintain confidentiality with all of GNA's information to which they may have access and that has not been produced for public disclosure. Use of credentials (ID, passwords and name tags) is authorized on an individual basis, is non-transferable, and shall not be shared under any conditions.

All and any information deemed to be confidential and privileged shall be used in strict compliance with professional activities and shall not be used for personal advantage or shared with Third Parties, particularly with the intent on trading securities for oneself or associated persons.

Staff Members who have confidential or privileged information with regard to GNA's shareholders or any other company, such as a customer, supplier or joint venture partner whose securities are listed for trading on a stock exchange or an organized securities market, are not allowed to trade in these companies' securities.

Confidential or privileged information may be attained as a result of an employee's position and responsibilities and includes non-public information about the following matters, among others:

- financial plans or budgets;
 - dividend changes;
 - significant mergers or acquisitions;
 - divestitures;
- 

- particularly important contract awards or strategic plans;
- major developments in litigation;
- technical or product developments;
- major management changes, joint ventures and major business agreements; or
- business relationships.

GNA's confidential or privileged information cannot be exposed at work stations, printers and meeting rooms, and shall not be discussed in public places such as elevators, taxis, trade union meetings, associations and others.

6. MEDIA RELATIONS

It is essential that GNA's public communications are clear, accurate, consistent and responsible.

GNA has specialized areas for contacting press vehicles.

If there is a need for contact with communications media vehicles, it shall be taken to the immediate attention of the Communication and Press Relations Area.

Staff Members are not authorized to grant interviews or to convey information on the Company and its activities, directly or indirectly, to any communications media, except if duly approved by the Communication and Press Relations Area. Similarly, attendance by Staff Members at external events representing GNA, shall be previously informed to the Communication and Press Relations Area.

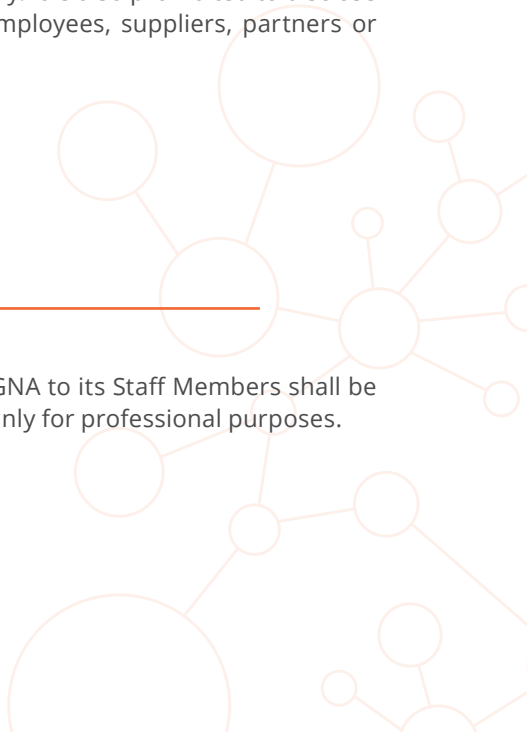
Staff Members are not authorized to speak with potential investors or market analysts, and are not permitted to provide information on the company's business.

In social networks, Staff Members shall make sure that all the contents posted are solely of a personal nature. Remember that your social posts and comments are not anonymous and can negatively impact GNA's reputation.

Unless previously approved by the Communication and Press Relations Area, it is not permitted to disclose photos or information on transactions held by the Company. It is also prohibited to disclose confidential facts on customers, employees, suppliers, partners or Third Parties.

7. USE OF ASSETS AND RESOURCES

Assets and resources provided by GNA to its Staff Members shall be used in a responsible manner and only for professional purposes.



Staff Members shall not expect privacy in their communications with regard to devices and systems provided by GNA to carry out their professional activities, such as Internet, telephones, e-mails, software, hardware and any others. GNA may monitor such devices and systems whenever required, to the extent permitted by law.

Under no circumstances shall assets and resources provided by GNA be diverted for personal use or unlawful ends.

Staff Members shall (i) be conscientious and act appropriately to ensure Company's assets are not damaged, misused, or lost; (ii) make sure their user IDs and passwords are secure and be vigilant against cyber-attacks and scams, such as phishing, and report immediately any incidents, including potential or actual losses of GNA information or assets; and (iii) protect GNA's intellectual property and respect the intellectual property rights of others.

7.1 DATA PROTECTION AND DATA SECURITY

Personal data of Staff Members, customers or other Third Parties may only be collected, processed or used insofar as it is necessary for pre-determined, clear, and legitimate purposes. In addition, personal data must be maintained in a secure manner and appropriate precautions shall be taken when transmitting it. High standards must be ensured with regard to data quality and technical protection against unauthorized access. The use of the data must be transparent for those concerned and the rights of those concerned must be safeguarded with regard to use and correction of information and, if applicable, to objections pertaining to blocking, and deletion of information.

In some jurisdictions (such as the European Union) there are strict laws and regulations pertaining to the collection and use of personal data, including data on others, such as customers or business partners. All Staff Members must abide by such laws, to the extent they are applicable to protect the privacy of others.

8. INTERNAL LEDGERS AND RECORDS

GNA and its Staff Members shall keep ledgers, accounting and financial books updated, precise and complete, in compliance with legislation and applicable accounting standards. It is the duty of all Staff Members to ensure accuracy of information recorded, so that GNA's shareholders may monitor the Company's performance transparently.

Each piece of information and internal record produced, circulated or kept in the systems or in GNA's equipment are the latter's sole property and shall not be used for personal purposes.

Any relevant information created by Staff Members during their work at GNA shall be stored pursuant to legal deadlines and in accordance with internal procedures. Staff Members are restricted from deleting, destroying or taking any information or documents on termination of their labor bond with GNA.



9. ANTICORRUPTION

GNA does not tolerate acts of corruption in any of its forms. GNA complies with anti-bribery and corruption laws and regulations and supports efforts to eliminate bribery and corruption worldwide.

Staff Members are strictly forbidden to offer, promise or give, directly or indirectly through third parties, any undue advantages to public or private agents (whether in cash, items, services or any other benefits) with the purpose of influencing decisions likely to affect GNA's business or to involve any personal benefits.

Staff Members acknowledges that, for the purpose of this Code, the term "public agent" means any person that, in Brazil or overseas, holds an office, employment or public function in bodies, state entities or diplomatic representations, in legal entities directly or indirectly controlled by the public authorities, in international public organizations, in political parties, although temporarily or with no compensation, or those persons who are candidates for public or elected offices. The same treatment as public agents shall be received by family members of public agents: spouses, companions, grandparents, parents, siblings, children, nieces, nephews, aunts, uncles and first cousins; spouses of any persons mentioned above; and any other persons that share the same home.

An example of undue advantages is a "facilitating" payment: small sums in cash or promises of advantages to a public agent with the purpose of speeding up a process, for example, for issuing an official document. Such conducts, with the intention of influencing decisions by public agents, are strictly forbidden under this Code.

Even without the purpose of influencing decisions likely to affect GNA's business, or not involving any personal benefits, Staff Members

are also restricted from promising, offering or providing any financial advantages to public agents, even when involving small sums, such as payment of meals or commuting expenses, when the law or applicable regulations do not permit. Prior to incurring any expense, check with the Compliance Area on whether the payment of such expense is restricted for that specific public agent.

If becoming a victim of extortion, by means of violence or serious threat that lead to a Third Party or public agent to be given a financial advantage, the Staff Member shall place his safety in the first position. However, the Staff Member shall immediately report the event through GNA's Whistleblowing Channel.

Although a simple request for undue payment, without the existence of a threat of immediate physical assault or of serious property damages, is insufficient to comply with the legal requisites of extortion, Staff Members shall be encouraged to report such requests through GNA's Whistleblowing Channel.

9.1. RELATIONS WITH PUBLIC ADMINISTRATION

GNA requires that Staff Members' interaction with public administration and public agents shall take place ethically and strictly within the limits of the law.

When these contacts are intermediated by professional service providers such as attorneys, consultants or expeditors, Staff Members shall formalize these actions in writing and include compliance clauses adequate for the nature of the activity.

Staff Members shall act in accordance with compliance standards in all of their contacts with public agents, such as when obtaining or renewing licenses and permits, participating in public bids or public contracts, monitoring inspections and court or administrative proceedings, among others.

Besides being forbidden to directly or indirectly offer or give undue advantages to public agents or to third parties related to the latter, Staff Members are also expressly and strictly forbidden, whether directly or indirectly, from practicing any type of action against domestic or overseas public administration, including without limitation:

- Funding or incurring expenses with unlawful actions, and concealing or dissimulating interests or the beneficiary of unlawful actions;
- Tampering with or defrauding public bids or administrative contracts; or
- Hindering investigation activities or inspections by bodies, entities or public agents, or interfering in their activities.

Staff Members representing GNA before public agents in hearings and meetings shall be accompanied by at least one more Staff Member and shall formalize the meeting in writing, by email or at the respective entities premises, also complying with the provisions stated by internal rules of the Company.

Staff Members shall not make any donations to political parties or candidates for public office, on behalf of or with GNA's funds. GNA will not permit political and/or party activities during business hours or inside its facilities and will require Staff Members to resign from the Company, should they wish to become a candidate for public office.

As individuals, Staff Members have the right to personally participate in the political process, including making personal political contributions, provided that it is made clear that their personal views and actions are not those of GNA.

10. ACTIVITIES THAT REQUIRE SPECIAL CARE

10.1. HIRING SUPPLIERS, DONATIONS AND SPONSORSHIPS

GNA works with business partners in an honest, respectful and fair manner and gains its competitive advantages through strong performance rather than through unethical or illegal business practices.

GNA chooses carefully its business partners, seeking to work with Third Parties who share similar commitments to safety, ethics and compliance.

The following activities imply greater legal and compliance risks for GNA and for Staff Members, and require special care:

Suppliers

Selecting, retaining and paying suppliers of goods and services shall be based on a genuine need and criteria related to technical, professional, ethical and sustainability, assuring the best cost-benefit to GNA, free from interference by any Staff Members' personal interests, always by means of duly formalized contracts or purchase orders. In compliance with its values and principles, GNA will privilege its relations with Third Parties that adopt seamless ethical practices in their business development, and act in accordance with the following principles, concerning responsibilities vis-à-vis stakeholders and the environment:

- a. Comply with all applicable laws;
- b. Prohibit corruption;
- c. Respect basic human rights of employees;
- d. Comply with laws prohibiting child and forced labor;
- e. Take responsibility for the health and safety of their employees; and
- f. Act in accordance with applicable statutory and international standards regarding environmental protection.

Joint Ventures

As such companies are organized under one sole purpose, GNA may be held responsible for corrupt activities by its partners in a joint venture (companies which GNA owns an equity interest jointly with another company).

Donations to non-profit entities

Donations to non-profit, philanthropic or charitable entities shall be made with a genuine purpose, to entities defined institutionally by GNA, based on technical criteria and by means of a written agreement.

Sponsorships

Sponsorships are permitted, provided that they are performed in compliance with GNA's internal rules, with a genuine purpose and at a fair market price, in order to provide publicity or to disclose GNA's brand, by retaining a lawful and adequate institutional counterparty selected based on technical criteria and by means of a written agreement.

In the cases above as well as in others provided for in GNA's internal rules, Staff Members shall obtain the required information for a diligent risk assessment (due diligence), complete the applicable forms

and, if necessary, obtain approval for retention by the Compliance Area, always in compliance with GNA's internal rules.

A due diligence is intended to assess the good standing and experience of Third Parties, as well as to determine whether any owners, officers, directors, employees of Third Party associated companies are public agents.

Staff Members shall report any warnings that a supplier or business partner is not complying with applicable laws or their contractual obligations.

10.2.OFFERING AND RECEIVING BUSINESS COURTESY

Staff Members may individually receive, offer, promise or give (as applicable) the following business courtesies, provided that (i) the addressee is not restricted from receiving; (ii) such business courtesies are not motivated by unethical intentions, given in return for any services or confidential information, excessive or inappropriate (i.e., adult entertainment) and/or frequent:

- Institutional material with GNA's name and logo, those of customer, supplier or civil society private entities such as pens, agendas, caps, among other low-cost promotional items;
- Meals with a clear business purpose or when a Staff Member represents GNA officially, provided that such meals are restricted to a reasonable value and are not customary occurrence; and
- Cultural or sporting entertainment with a clear business purpose or for GNA's institutional representation, provided such is restricted to a low reasonable value, and are not customary occurrence and with the Staff Member's attendance.

As a rule, GNA establishes as a reasonable value to act as a limiting factor for the courtesies listed above, a sum of R\$ 100.00 (one hundred Brazilian Reais). In addition, courtesies listed above must be offered or received in a generalized manner (i.e., not intended

exclusively for a particular Staff Member, Third Party or public agent). Finally, courtesies must not be offered to or received by the same Third Party or public agent more than once in a period of less than twelve (12) months.

If there is a conflict between GNA's business courtesies requirements and applicable external business courtesies requirements, Staff Members shall follow the strictest requirement.

Expenses with accommodation, including meals, travel and commuting, involving Third Parties or public agents shall be previously approved in writing by GNA's Compliance Area. In order to obtain such approval, Staff Members shall complete a specific form and provide the following information, among others: (1) the expense's value and description; (2) name of addressee, office and employer; and (3) reason for incurring the expense.

A number of overall guidelines related to business courtesies shall be complied with:

- Payment shall be made directly to the service providers, when applicable (eg, hotel, airline, etc.);
- Should there be a contractual provision for payment of daily expenses, these shall be made by checks or bank transfers to a bank branch or other company, but never directly to a person and will be documented by means of a receipt. Payments shall not be made in cash under no circumstances;
- Expenses with accommodation, meals and travel will be restricted to public agents or Third Parties, and shall not include expenses in connection with family members or their guests;
- The invitation to travel shall be addressed to the body in which the public agent works or to the company where the Third Party works, and never directly to the person due to travel.

Any exception to these rules for business courtesies shall be recorded and previously approved by GNA's Compliance Area.

11. RESPECT TO COMPETITION RULES

GNA requires respect for free competition. Staff Members shall not violate legislation and competition protection rules, and any practice or action designed to frustrate or defraud competition or to fix prices, such as dividing customers, markets, territories or products, tampering with public bids or competitive procedures, boycotting suppliers or customers, controlling the supply of goods and services, among others is not permitted.


In case any Staff Member has doubts on competition and antitrust laws, please contact GNA Legal Department.

12. RESPECT TO INTERNATIONAL TRADE LAWS

GNA shall abide by the trade laws of all countries in which GNA operates, including economic sanctions, import and export laws.

Most countries where GNA operates impose restrictions on the movement of products across borders.

Staff Members involved in transactions, such as business dealings with a sanctioned country, entity, or person, must ensure compliance with applicable trade laws.




Products intended for import or export must be classified in advance, and all required labelling, documentation, licenses and approvals completed.

In case any Staff Member has doubts on international trade laws, please contact GNA Legal Department.

13. PREVENTION OF MONEY LAUNDERING

Money laundering is the process of hiding or making illegal funds look legitimate. It also covers the use of legitimate funds to support crime or terrorism. GNA has the following recommendations for its Staff Members:

- Never become involved in money laundering;
 - Know who you are doing business with by following due diligence procedures; and
 - Raise concerns where you see them.
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14. PREVENTION OF CONFLICTS OF INTEREST

GNA does not authorize Staff Members to obtain personal advantages or be subject to influence in their professional duties due to conflicts of interest.

GNA shall be informed immediately when personal interests by Staff Members are in conflict with GNA's interests, whether due to facts that have occurred or due to circumstances not yet materialized.

Staff Members transparency with the Compliance Area is extremely important in order to better address and resolve situations with apparent conflicts of interest. For example, when a Staff Member's spouse works at a company that provides services to GNA, it is important that this fact is reported to the Company, for the adoption of steps intended to protect the Staff Member from being involved in a potential conflict of interest.

Staff Members shall also avoid circumstances likely to create conflicts of interest by GNA with public authorities, which are understood as situations that could possibly jeopardize the collective interest, or the influencing in an inappropriate manner the performance of public authorities.

Acting in situations of conflicts of interests may be unlawful and lead to serious consequences for Staff Members and for GNA. Several examples of serious and restricted conflicting interests include, but are not limited to the following:

- Having an intimate relationship with another Staff Member who can influence decisions such as salary, performance ratings or promotions;
- Using or sharing confidential or privileged information in order to create personal or family gains, for example, profiting from purchasing and selling GNA's securities or those of its customers;
- Retaining companies belonging to public agents or to their family members, intending to influence decision by public agents;
- Retaining a friend or family supplier under less favorable conditions to the Company, as compared to those practiced in the market by third parties with equal abilities;
- Acceptance of external responsibility of a personal nature likely to affect performance in the Company or assist GNA's competitors;
- Working with close relatives, especially those who are government officials; or
- Use of GNA's resources to meet private interests.

15. DISCIPLINARY MEASURES

Staff Members who disregard this Code, laws and regulations applicable to their activities and GNA's internal rules, or, by omitting certain actions, allow other Staff Members to do so, will be subject to disciplinary measures compatible with the conduct practiced, including oral or written warnings, suspension or termination of the labor agreement with just cause.

Depending on the nature of the violation, GNA reserves itself the right of forwarding a report to the competent authorities, which may result in imposing lawful sanctions.

Any attempts to prevent, obstruct or convince Staff Members not to report what they believe to be, in good faith, a violation of this Code, of an applicable legislation or of any GNA's internal rules is strictly prohibited.



16. FINAL PROVISIONS

All Staff Members shall undersign the instrument that follows to certify that they received, read, understood and agreed with the provision of this Code.

No code or ruling will cover every possible situation involving ethical and flawless conduct. Hence, GNA expects that all of its Staff Members will exercise careful vigilance and judgment at every moment in the course of their professional activities.

Staff Members who wish to receive additional guidance or who wish to make suggestions or question the Code shall contact the Compliance Area by means of the email compliance@gna.com.br.



CODE OF CONDUCT RECEIPT INSTRUMENT

I confirm that:

- 01.** I received, read and understood the Code of Conduct of Gás Natural Açú S.A.;
- 02.** I agree fully with its contents; and
- 03.** I am bound to comply fully with its provisions, reporting any actions or likely actions of violations of which I may become aware.

Employee Third Party

Taxpayers' Enrollment No. (CPF): _____

Company: _____

Legible name: _____

Date: _____

Signature: _____

I SUPPORT OUR
CODE OF
CONDUCT



GNA
GÁS NATURAL AÇU