



INTEGRITY, PRIVACY AND
DATA PROTECTION
PROGRAM

1. PRESENTATION

This Data Integrity, Privacy and Protection Program will serve as a reference for Fortlev Solar's performance, to contribute to its evolution in harmony with people, organizations, and the environment. This Program aims to highlight the principles and values that guide Fortlev Solar's activities, as well as familiarize its Employees with the best practices relevant to the company's activities, indicated in this material based on the Brazilian legislation in force.

Fortlev Solar's Data Integrity, Privacy and Protection Program is in line with the Guidelines of the Ministry of Transparency, Inspection and Control for Private Companies in the development of compliance programs specifically aimed at the prevention, detection and remediation of acts that are harmful to anti-corruption standards. ("Integrity Program: Guidelines for Private Companies"), the guidelines of the General Data Protection Law, the new rules established by the Bidding Law, the Antitrust Law, as well as fully in line with international documents that deal with prevention and inhibition of acts of corruption and laundering of assets, values and capital that were adopted by Brazilian legislation.

All Fortlev Solar Employees and professionals are expected to follow and implement the guidelines contained herein. In an easy way, this document addresses recurring internal themes and those that arise from the relationships between Employees and external agents, such as Customers, Suppliers, business partners and representatives of public authorities in their various spheres and levels of activity.

Direction of Fortlev Energia Solar

2. FORTLEV SOLAR'S GENERAL PRINCIPLES AND GUIDELINES FOR OPERATION

2.1. Corporate principles

Among the corporate principles that govern the performance of Fortlev Solar for the purpose of complying with this Integrity Program, the following stand out:

- Ethics and Transparency;
- Support and Respect for Individual and Social Interests;
- Respect for the Environment;
- Respect for Current Legislation and Institutions.

2.2. Mission, Vision, and Values

Employees are expected to know and implement Fortlev Solar's Mission and Vision, and to respect the Values adopted and already disseminated by the company.

MISSION

To be a reference in intelligent photovoltaic solar energy solutions, creating a sustainable future where people across the country can have access to clean and renewable energy with quality and reliable products that generate savings on the electricity bill.

VISION

To be recognized as a Christian company that honors God and is a leader in solar energy solutions.

VALUES

Faith in God, Ethics, Respect, Commitment, Simplicity, and Sustainability.

3. RELATIONSHIP WITHIN THE MARKET

Fortlev Solar's commitments are: (i) to preserve the principles of free competition, with independent commercial practices; (ii) ensure that all contracts with Customers and Suppliers are carried out under fair competition conditions; (iii) not to denigrate the image of Competitors.

3.1. Intellectual property

3.1.1. Confidential information

Any information and data that is not freely available to the public is considered confidential. Examples of information to be protected are technological secrets, product formulas or recipes, trade secrets, business plans, customer points of view, projects, drawings, databases, records, salaries and any other financial or non-public information.

3.1.2. Protection of confidential information

Collaborators must comply with the following obligations regarding the protection of confidential information:

- Do not discuss Fortlev Solar's confidential information with unauthorized persons.
- Not supporting the creation and dissemination of rumors.
- Do not access and/or keep files or programs of a pornographic, racist, pirated, or prejudiced nature on your computer in any way.
- People who do not work at Fortlev Solar are not allowed to have access to computers, data storage devices or physical company documents.
- Use corporate email only for work-related purposes.
- The exposure of Fortlev Solar's data and results must always rely on consultation with a hierarchical superior and obtaining prior authorization, according to its purpose.
- Interviews must only be granted by people authorized by the marketing department.
- The use of Fortlev Solar's visual image depends on authorization from the marketing area, in accordance with the brand's identity policies.
- It is necessary to obtain authorization from the hierarchical superior to take part in actions developed by other organizations, such as meetings and workshops.

To disclose or use this information inappropriately may constitute a crime and result to the Employee not only disciplinary sanctions and dismissal for just cause, but also civil and/or criminal sanctions.

The duty of confidentiality in relation to information and data must be respected even after the end of the relationship between the Employee and Fortlev Solar.

3.1.3. Unfair competition

Any practice that aims obtaining undue advantages from investments by Competitors is prohibited, for example:

- Import, market, offer, sell any product or component that is protected by a trademark, patent, industrial design, or geographical indication registered by a competitor.
- Incorporate in Fortlev Solar's products any sign or title that imitates the logos, names, or brands of Competitors.
- Disclose false information from Competitors, the market or Fortlev Solar itself, to gain an advantage.
- Diverting Clients from Competitors and/or from Fortlev Solar by fraudulent and illegitimate means.
- Tampering with Fortlev Solar or Competitors' products.
- Offer money or any type of advantage to any employee of Competitors to obtain favors or privileged information.

- Disclose specific knowledge, test results, pricing formulas or other details about Fortlev Solar's or Competitors' products and services.
- Force and/or entice the Employees of Competitors, Customers and Suppliers to break existing contracts with third parties.

3.2. Mergers, acquisitions, or partnerships with other companies

When facing a negotiation involving mergers, acquisitions, or partnerships with other companies, consult the legal department or specialized external consultants for detailed guidance on the need to notify the Administrative Council for Economic Defense (CADE), the conduct of the business until its closing, as well as possible competitive risks related to the operation.

3.3. Anticompetitive Practices

There are some practices that are harmful to competition and, above all, to Fortlev Solar's Customers, as they can result in higher consumer prices, a smaller number of Competitors, among other damages to society. The Competition Defense Law presents some examples of practices that can be considered anti-competitive:

- Agreements, adjustments, manipulations with Competitors.
- Adoption of uniform conduct among Competitors.
- Limit, prevent, hinder the access of new companies to the market.
- Underselling.
- Tying.

In addition to possible administrative consequences for individuals and legal entities, such as the imposition of fines and restrictions on rights, some of these practices are also considered crimes.

If practices that may be considered anti-competitive are adopted, planned, or become aware of, it is recommended that the practice be communicated to the legal department or specialized external consultants to obtain detailed information on the risks involved.

3.4. Relationship with Competitor Companies

3.4.1. Independence in the formation of the commercial strategy

Companies, including Fortlev Solar, must act independently in determining their business strategy. This independence in the formation and determination of the commercial strategy encompasses:

- Distribution methods
- Definition of production levels

- Price definition
- Financing policy
- Strategies regarding Customers and Suppliers
- Manufacture and sale of products and services

3.4.2. Sharing information with Competitors

The possession or sharing of strategic information from a competitor may constitute a breach of current legislation. Thus, at these points, the following precautions must be taken:

- Not accepting from a competitor specific information or offering company-specific information to a competitor.
- Information should not be obtained through threats, exchanges of favors or other means of dubious suitability (and not ask any employee to do so).
- All information requested by the trade association for the purpose of preparing studies and industry reports must be provided voluntarily, including by non-members.
- Information exchanged between associates within the scope of entities representing the sector must refer to past periods only and never include plans, projections, or estimates.
- The information provided by trade associations to their members and non-members must be consolidated and aggregated as per the sector, so that the numbers cannot be related to the respective companies.
- Information about Customers, prices, strategies, among other commercially sensitive information should not be provided under any circumstances.

3.5. Meetings with Competitors

As Fortlev Solar is associated with class entities, it is possible that there may be legitimate and important association meetings, such as conventions, seminars, or workshops at which Competitors will be present. These meetings deserve special attention because they create opportunities for discussion or participation in the prohibited activities described above.

Among the precautions to be taken in meetings with Competitors, it is possible to list the following:

- Not discussing product prices, sales conditions, and strategies.
- The meetings of each association committee must deal exclusively with the specific themes of each work group.
- Prior examination of the agenda.
- Leave the meeting immediately if illegal topics are discussed.
- Be careful when signing minutes! No matter how long it takes to read, the important thing is to make sure that you are signing the minutes of a lawful meeting, whose subjects discussed are not prohibited.
- Never argue with Competitors about:

- Standardization or stabilization of commercial conditions.
- Sales control.
- Pricing policy.
- Agreements to fix prices or share markets.
- What is a "fair level of profit".
- Boycott a company because of its pricing or distribution practices.
- Whether the business practices of Customers or Competitors are "ethical" or "appropriate".

3.6. Joint negotiation

Joint negotiation through a class association is, in principle, a lawful practice. However, joint negotiation can create a risk in cases where the joint power of the members allows the association to impose anti-competitive, excessively low prices that impede the profitability of the other party in the negotiation. In this sense, any initiative involving this topic must be discussed and approved in advance by Fortlev Solar's legal department.

4. RELATIONS WITH EMPLOYEES

Fortlev Solar offers a value proposition to its Employees that seeks to attract, retain, and commit the talent required to achieve its results. These are Fortlev Solar's commitments:

- To compensate its Employees according to their performance, competitively within the labor market and internal equity.
- To manage the performance of Employees in a systematic and objective manner, defining plans aimed at their personal and professional development.
- To have processes and generate actions that maintain the commitment of all Employees, obtaining from them the greatest willingness to try and the intention to remain in the company.
- To provide employees with healthy and safe working conditions, not only in relation to the physical environment, but also in the psychosocial work environment, including the organization of work and the organization's culture.
- To provide quality of life for Employees and their families, as well as the free expression of Employees.
- To define and apply labor guidelines based on equity and equal opportunities, not allowing discrimination on grounds of race, gender, age, ethnicity, nationality, religion, or sexual orientation, among others.
- To promote teamwork as the best form of relationship, developing an environment that fosters maximum synergy between Employees.

4.1. Work environment: health, safety, and environmental management guidelines

To create a healthy and safe work environment, Fortlev Solar adopts a policy of prevention of work accidents, investing in professional qualification to preserve its human and material assets and investigating accidents that violate the legislation, policies, and rules of Fortlev Solar, for example:

- Ensure occupational health, safety, and environmental management, both for themselves and for their subordinates.
- Report accidents, risk factors, unsafe acts, or dangerous conditions to the superior.
- Make the best use of resources that generate environmental impact.
- Participate in preventive initiatives organized by the responsible areas of Fortlev Solar.
- If the practical situation is not foreseen by the internal procedures, make the decision together with the superior.
- Do not fail to follow the rules of health, medicine, and safety at work, even in emergency/urgency situations.
- Do not fail to use the protective equipment provided by Fortlev Solar.

4.2. Conflicts of interest

An Employee will be in a situation of conflict of interest when he decides or adopts a behavior, in the exercise of his duties, with the purpose of obtaining an illegitimate advantage for himself or for a third party, to the detriment of Fortlev Solar. These are examples of possible conflicts of interest that may arise while working at Fortlev Solar:

- To obtain an advantage for yourself or a third party, using professional decision or privileged information.
- To keep jobs or activities that jeopardize their professional performance, or conflict with the interests of Fortlev Solar.
- To unduly privileging relatives, friends, etc.
- To use company resources on non-work occasions without authorization.
- To receive an undue advantage from a third party that maintains a relationship with Fortlev Solar and/or its partners.
- To use your position at Fortlev Solar to obtain, for yourself or a third party, special business conditions.

The Employee who comes across a real or potential situation of conflict of interest must inform his/her superior, who will inform the ombudsman of Fortlev Solar, which will evaluate the case.

4.3. Consanguinity and affinity

Direct subordination relationships between members of the same family must be carefully evaluated by the ombudsman of Fortlev Solar, to avoid situations that may constitute a conflict of interest.

In the event of affective relationships between professionals, the respective superiors must be communicated. They will be responsible for informing HR, to analyze such facts and adopt the appropriate measures to avoid situations of conflict of interest and unequal treatment between Fortlev Solar Employees.

4.4. Proper use of Fortlev Solar resources

4.4.1. Equipment and systems

The Employee is responsible for the safe use of Fortlev Solar's equipment and systems, and Fortlev Solar has the right to monitor and record the use of such equipment and systems.

Collaborators must not use Fortlev Solar's assets, including information technology resources, for purposes other than the company's objectives. Collaborators must also not share their passwords, their access to the company's platforms and data, nor visit websites with offensive, illegal and/or inappropriate content.

4.4.2. Financial resources

Fortlev Solar's financial resources and assets must be used sensibly by Employees and only for the company's business. Business operations must be reputable, and accountability must be accurate, proven, and timely. Employees must not use or negotiate the company's financial resources for their own benefit or for unauthorized third parties, nor carry out operations whose legality is dubious or with reckless costs. If in doubt, consult your superior, or a representative of the company's financial department.

4.5. Political-Party Involvement

Political-partisan activities must be carried out on behalf of the Collaborator only. Employees are authorized to make personal contributions to candidates and political parties if they do so in their own name and exclusively with their resources. In the political-party involvement, it is not allowed:

- To use the name of Fortlev Solar in political party activities.
- To firm political opinions as if they reflect the company's position.
- To contribute to a candidate or political party as if it reflects the positioning of Fortlev Solar.
- To campaign or to manifest in working hours or spaces (including virtual ones).

Fortlev Solar encourages the exercise of freedom of association, including partisanship; however, with respect to the limits of the freedom of everyone, including the company itself.

4.6. Contests and Raffles

Fortlev Solar Collaborators should not, as a rule, hold a raffle or contest during working hours or spaces, nor use work tools for this purpose. They must also not participate, directly or indirectly, being a Collaborator or a relative of the Collaborator, in external contests and sweepstakes organized by the company.

4.7. Gifts and giveaways

To grant or receive gifts and gifts of significant value, that is, equal to or greater than BRL 100.00 (one hundred reais), the Employee must request approval from Fortlev Solar. Also, the Employee can only accept invitations to dinners and events or promote dinners and events if it is for convenience and for commercial purposes, informing the ombudsman of Fortlev Solar.

Collaborators will not be allowed to:

- Giving or receiving, without approval, a gift, money, property, or any benefits of significant value.
- Accept a benefit, of significant value, from anyone who wants to establish or maintain a business relationship with Fortlev Solar.
- Exchange of gifts or gifts with public officials.

4.8. Guidelines for the General Behavior of Employees

4.8.1. Discrimination and Harassment

At Fortlev Solar, no form of discrimination and/or harassment will be allowed, for example:

- Embarrassing nicknames and “jokes”.
- Isolate the Employee in the work environment or withdraw autonomy, without reason and to embarrass.
- Cause fear, terror, distress, persecution, bullying.
- Discriminate by gender, race, sexual orientation, etc.
- Create goals and establish unfeasible deadlines, to harm the work and esteem of the Employee.
- Carry out approximations of sexual nature or promote any insinuation to that effect.
- Making malicious comments, raising doubts about the honesty and sexual ability of others, or promoting any insinuations to that effect.
- Undermining the former Employee's chances of getting a job elsewhere, defaming him/her.

Hostilities, embarrassments, threats, or intrusions into people's private lives, as well as inappropriate insinuations of any nature, whether of a discriminatory nature or that may constitute moral or sexual harassment, regardless of the hierarchical level of those involved, will not, under any circumstances, be admitted to the company-related workplace, event, or meeting.

Any Employee who feels that he is being a victim of any type of harassment must submit the complaint to ombudsman of Fortlev Solar.

It is worth mentioning that it does not constitute harassment: (i) objective practices aimed at the development of Employees, such as performance evaluations, feedback conversations, respectful guidelines, and warnings; as well as (ii) the directive power of the employer, through orders or recommendations for the preparation of the required work within the deadline or requests for the use of safety equipment.

4.8.2. Clothing, Image and Behavior

Inside or outside the company's facilities, during working hours, the Employee represents not only himself but also Fortlev Solar. Therefore, the Employee must always observe the following guidelines:

- Show up to work properly dressed, wearing clothes compatible with the environment and, when required, wear a uniform and individual or collective protective equipment.
- The Collaborator should, whenever possible, avoid wearing clothes that contain images or texts that promote brands not belonging to Fortlev Solar or that offend good customs.
- The work environment at Fortlev Solar must be free from the influence of psychoactive substances (cigarettes, alcohol, non-prescription or illicit controlled drugs), which can harm the physical and mental integrity, efficiency, productivity, and safety of Employees.
- Every Fortlev Solar Employee who is on a business trip or representing the company at a social event, celebration or sales convention must demonstrate exemplary behavior. In this type of situation, the Employee must apply all the recommendations of this Integrity Program, the protocol rules according to each country and culture and must abstain from the consumption of alcohol.

5. RELATIONS WITH THE PUBLIC OFFICERS

5.1. Harmful acts to the National or Foreign Public Administration.

Regarding the regular contact with the Public Administration, Fortlev Solar develops its activities in an straightforward way. In this sense, the following practices are prohibited:

- To promise, offer or give, directly or indirectly, an undue advantage to a public agent, or a third party related to him.

- Financing, funding, sponsoring or in any way subsidizing the practice of the illicit acts listed herein.
- Using an intermediary individual or legal entity to hide or disguise their real interests or the identity of the beneficiaries of the acts performed.
- To make it difficult for the investigation or inspection activity of public bodies, entities, or agents, or to intervene in their performance, including within the scope of regulatory agencies and supervisory bodies of the national financial system.

Harmful acts to the Public Administration may result in an administrative fine and several other negative legal repercussions to the assets and activities of Fortlev Solar.

5.2. Public Procurement

Fortlev Solar does not tolerate any attitude that configures Collusion or other Frauds in public bidding procedures, such as:

- Division with Competitors of the Bids in which Fortlev Solar will participate.
- Price fixing, preventing bidders' proposals from falling below a "base price".
- Guidance of the bid winner.
- Purposeful alternation between submitted proposals, favoring a competitor who will complement your proposal.
- Subcontracting (when this is not provided for in the public notice).
- Presentation of unenforceable value propositions.
- Non-attendance or withdrawal from the contest, favoring a competitor.

Thus, for the representation of Fortlev Solar in Public Tenders and Biddings:

- When carrying out contracts with the government, Fortlev Solar will carefully analyze the requirements for waiver or unenforceability of Bidding.
- When the event is held, the company must always participate independently, except in the case of forming consortia, seeking to offer its best price.
- Fortlev Solar employees are prohibited from trying to obtain extensions or amendments to administrative contracts with a view to obtaining undue advantages or manipulating the economic-financial balance of the contract.

5.3. Corruption

The best way to combat and prevent situations that could give rise to acts such as corruption or concussion offenses, as well as related crimes, is to:

- Not accept, whether the Employee or any person connected to Fortlev Solar, the invitation to meetings with public, private persons (employees, commissioned or with elective positions) that may exert any type of influence on signed contracts or still under negotiation.
- Seek to deal objectively, assertively, and punctually with all matters related to public contracts signed, respecting the provisions of public notices and contracts.
- Avoid meetings with public officials (commissioned officers, statutory electives) individually and in non-public places.

5.4. Laundering of goods, values, and capital

The crime of laundering is committed by those who, to hide or disguise the use of goods, rights or values arising from a criminal offence:

- Converts them into legal assets.
- Acquires, receives, exchanges, trades, gives, or receives them as collateral, keeps them, has them in deposit, moves or transfers them.
- Imports or exports goods with values that do not correspond to the real ones.
- Uses, in economic or financial activity, assets, rights or values arising from criminal offenses.
- Participates in a group, association or office knowing that its main or secondary activity is directed to the practice of crimes provided for in Law no. 9,613/1998.

It is important that all Employees are aware of situations that, from time to time, may become aware and, once detected, report the situation to the ombudsman so that the appropriate measures are taken.

5.5. Administrative improbity

There is provision in the legislation of sanctions applicable to public servants who practice acts of administrative improbity. However, the sanctions are also applicable to people who, even if they are not public agents, induce or contribute to the practice of the act of administrative improbity or benefit from it in any way, directly or indirectly. Thus, it is forbidden for all Fortlev Solar Employees to induce or compete for the following practices by public agents:

- Obtain any type of undue patrimonial advantage due to the exercise of a position, mandate, function, employment, or activity in Public Administration entities.
- Acting or omitting, intentionally or culpably, in a way that gives rise to loss of property, diversion, appropriation, embezzlement or dilapidation of the assets or assets of Public Administration entities.

6. GENERAL DATA PROTECTION LAW (“LGPD”)

The LGPD is the main Brazilian standard that regulates the activities of processing personal data, joining the Civil Rights Framework for the Internet and other legislation such as the Consumer Defense Code. These laws have the following objectives and purposes:

PURPOSES

- To preserve economic and technological development
- Free Initiative
- Free competition
- Consumer defense

GOALS

- To minimize the risks related to abusive treatment and/improper GOALS of personal data
- To enable that new businesses and technologies are developed in an environment of legal certainty

6.1. Treatment, control, and storage of data

The collection and processing of each personal information must be done for specific, legitimate, explicit, and informed purposes, in a clear and accessible way, by the controller to the data subject. Furthermore, there is a need for the holder's explicit consent, both for the use and for the revocation of the use of the data. All details on the subject, including the procedures adopted by the company, are present in the Privacy and Personal Data available on the company's website: <https://fortlevsolar.com.br/privacy>.

6.2. Data erasure

Personal data must be processed, stored, and eliminated within legal limits, guaranteeing the privacy of the data subjects. In this sense, although the LGPD does not specify a deadline for processing personal data, this treatment must have an end date, which is detailed in the Privacy and Personal Data available on the company's website: <https://fortlevsolar.com.br/privacy>.

7. CORPORATE SUSTAINABILITY

ESG (Environmental, Social and Corporate Governance) issues have come to be considered essential in risk analysis and investment decisions, putting strong pressure on the business sector.

ESG practices are based on the principles of the Global Compact:

- i. Respect and support internationally recognized human rights in its area of influence.
- ii. Ensuring the non-participation of the company in human rights violations.
- iii. Support freedom of association and recognize the right to collective bargaining.

- iv. Eliminate all forms of forced or compulsory labor.
- v. Eradicate all forms of child labor from its production chain.
- vi. Encourage practices that eliminate any type of discrimination in employment.
- vii. Assume practices that take a preventive, responsible and proactive approach to environmental challenges.
- viii. Develop initiatives and practices to promote and disseminate socio-environmental responsibility.
- ix. Encourage the development and dissemination of environmentally responsible technologies.
- x. Fighting corruption in all its forms, including extortion and bribery.

8. GUIDELINES FOR CRISIS SITUATIONS

Although Fortlev Solar is committed to the national and international legislation applicable to its activities, as well as in relations with Employees and representatives of the Government, Fortlev Solar may face a crisis, in which it is important that everyone knows how to act correctly.

- • *What is a crisis situation?* Any type of work accident or environmental disaster, or even judicial or administrative inspection or investigation, as well as searches and seizures, inspections, surveys, requests, and other procedures instituted by public bodies, entities, or agents (including regulatory agencies and bodies of the financial system national) for the verification of acts of the company and its Collaborators.

The attitudes of Employees during such procedures can be decisive in determining Fortlev Solar's responsibility, and they may also be held individually responsible for acts in violation of the legislation.

8.1. Practical guidelines for Employees in situations of inspection, investigation, inspection, search and seizure, and similar procedures

Faced with a crisis:

The first step in these situations is to immediately contact the legal sector, which is responsible for contacting the authorities. In other words, Employees must not interact with the authorities, but call the legal sector.

If the Collaborator is urged to remain at the place where the inspection, investigation, search, inspection, among others, is being carried out, the following steps must be followed:

- To communicate with Fortlev Solar's legal department when the responsible authority makes the first contact, with accurate transfer of the information provided by the authority on the procedure.
- To indicate to the authorities who are responsible for conducting the procedure.

- Never offer or promise, directly or indirectly, any type of advantage to the public agents responsible for the procedure, nor correspond to any type of expectation of the agents themselves in this regard, if they manifest it.
- Do not leave the authorities unattended while they are on the company's premises.
- To avoid being alone, in a private place on the company's premises, with the authorities.
- Always treat authorities with respect, demonstrating a collaborative and transparent attitude.
- Avoid any attitude that may hinder the procedure being carried out or intervene in the performance of the authorities.
- Not to hide, damage or destroy documents of any kind or under any circumstances, whether physical or electronic.
- To avoid internal comments on the matter and act in such a way that the procedure is not disclosed to the media.

8.2. Physical and electronic file management

The documents and general forms of communication used in the day-to-day business activity are relevant to the procedures for investigating alleged irregular practices.

Any exchange of information on any internal or external matter must be clear, reasoned, and professional, avoiding any inappropriate language that could inadvertently generate a wrong impression about the commercial activities performed by Fortlev Solar.

Therefore, communication via e-mail, which tends to be more informal, should be used with great caution. In the same sense, commercial decisions of the most diverse types must clearly show their motivations so that there are no wrong conclusions about their objectives.

- Reports, studies, publications, emails with relevant information and other important documents must be filed, with correct and clear nomenclature, so that they can be accessed when necessary.
- Everyday email must be deleted periodically in accordance with the company's document retention policy.
- General corporate documents, such as procedures for annual reports, minutes of board meetings, contracts, payment records, trademark and copyright registrations, audit reports, labor and social security documents, tax documents and any other documents and information submitted authorities must also be properly stored.

8.3. Confidentiality of information in crisis situations

Confidential information may only be provided to the authorities if there is a valid and suitable administrative or judicial order in this regard. In this situation, Fortlev Solar's legal department must be notified immediately of the official receipt of the authority request or knowledge of the subpoena act, so that, if applicable, they can adopt the appropriate measures.

9. COMPLAINT MECHANISMS AND DETERMINATION OF IRREGULARITIES

Fortlev Solar maintains routine work to assess whether the values and practices defined in this Integrity Program are being applied in the company's daily activities.

9.1. How to report an infringement?

To ensure compliance with this Integrity Program and applicable legislation, Fortlev Solar has corporate instruments aimed at its application, through prevention and inspection, as well as the correct determination and application of sanctions for non-compliance.

Did you commit the infraction? Did you witness the infraction? Did you become aware of the infraction? Were you a victim of the infraction? Did you participate in the infraction? Have doubts about how to act?

Report it to the Fortlev Solar Ombudsman (ouvidoria@fortlevsolar.com).

This communication channel was created to preserve the identity and well-being of the Collaborator, that is, the identity of the whistleblower will not be revealed or made public, and he will not suffer any reprisal or sanction for this act.

10. INTERNAL SANCTIONS AND PENALTIES

Once the internal and confidential processing of the cases that come to the attention of Fortlev Solar is carried out, after hearing those involved and providing isonomic and non-discriminatory treatment, without prejudice to the applicable sanctions provided for by law, disciplinary measures may be imposed in case of violation of the rules of this Program of Integrity.

The personal liability of Fortlev Solar's Employees by authorities, due to illicit practices, will not be assumed under any circumstances by the company. Likewise, any penalty imposed on Fortlev Solar due to the adoption of illegal practices by its Employees may be the object of a return action to be brought by the company to compensate for the damages caused to it.



FORTLEV ENERGIA SOLAR LTDA.

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