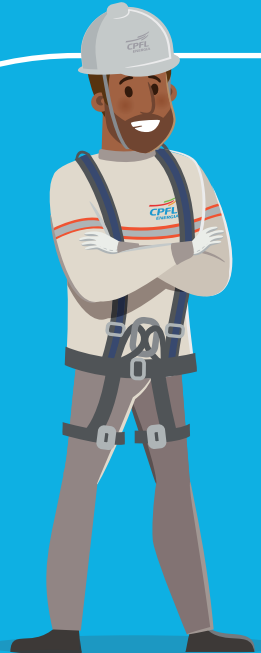


# Code of Ethical Conduct

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## Words from the CEO

What guides you in your personal and professional life? With this reflection, we reinforce that, at CPFL Energia, we are guided by Our Way of Being (Nosso Jeito de Ser) which, as you already know, represents each one of us employees. In practice, our behaviors must reflect our integrity and responsibility in everything we do, in all situations.

For this reason, I invite you to read our Code of Ethical Conduct, which is fully aligned with Our Way of Being. This is the tool that guides our practices and our day-to-day activities at the CPFL Group. The values and guidelines defined in this document must be practiced by all of us, regardless of the position we hold.

Furthermore, it is our responsibility to contribute to the Mission, Vision and Values (SAFETY, COLLABORATION, INNOVATION, EXCELLENCE and INTEGRITY) to ensure that we are all heading in the same direction, respecting and practicing our ethical commitments. This is how we build and consolidate CPFL Energia's environment of integrity.

**Gustavo Estrella**  
CPFL Energia CEO



# 1.

## Our Vision:

To be the largest power company<sup>1</sup> in South America by providing dependable supply and services recognized by different publics. To forge a long-lasting commitment to business development, innovation, and corporate culture.



<sup>1</sup> As per CPFL Energia's Governance Guidelines, the CPFL Group is the group of companies composed of CPFL Energia (holding) and its Subsidiaries and Affiliates: Subsidiaries are companies controlled by CPFL Energia, directly or indirectly. Affiliates are companies in which CPFL Energia holds 50% or less, directly or indirectly.

## 2.

### **Our Mission:**

We provide sustainable, affordable and reliable energy at all times, making people's lives safer, healthier and more prosperous in the regions where we operate.

We promote the growth of our business in a more strategic and competitive way, maintaining its dynamics and vitality, and we create an international corporate culture that follows standards and respects diversity while strengthening our legacy.

We provide equal opportunities for all employees, attracting talents to CPFL.



# 3.

## Our Way of Being

Our Way of Being is connected with the CPFL Group's Mission, Vision and Values and guides the behavior expected from our employees. It consists of the following four dimensions:



### **We explore new possibilities**

We are proactive and anticipate internal and external needs, being flexible, innovative and connecting ideas.



### **We build trust in relationships**

We lead by example, work together and promote integrity while valuing diversity at all times.



### **We deliver exceptional results with confidence**

We strive to create value for the company and the customer by acting as an owner and optimizing safety.



### **We learn from the journey**

We promote an environment of excellence, seek continuous improvement and learn from mistakes and achievements.

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## 4.

The following ethical values guide our relationships with stakeholders and the general public:

- a) Promptness and courtesy;
- b) Dignified and respectful treatment;
- c) Exemplary and transparent behavior;
- d) Professional pride;
- e) Continuous pursuit of excellence and professional growth;
- f) Quality of life and safety at work and in the community;
- g) Respect for diversity and inclusion;
- h) Social responsibility and respect for the environment; and
- i) Sustainable development.

Contract negotiations, agreements, proposals, or even changes to the Company's corporate documents, including internal ones, must follow the principles mentioned above.

# 5.

We are committed to the international human rights principles set out in the Universal Declaration of Human Rights, the International Labor Organization Declaration of Fundamental Principles and Rights at Work, the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights. In addition, the CPFL Group contributes to achieving the 2030 Agenda in each of its 17 Sustainable Development Goals.





## 6.

Honesty and integrity are the foundations of our relationships with stakeholders and the general public, striving to ensure that our decisions and practices reflect the Company's ethical principles and values at all times, thereby assisting in the development of lasting relationships based on trust.



# 7.

All of our negotiation processes must be transparent and ensure the accuracy of the information provided to partners. Only in this manner will we achieve the necessary credibility for the development of the Company's business activities



# 8.

Everyone, whether a CPFL professional or not, must be treated with dignity and respect. We want to be a company where employees feel valued.



# 9.

We are constantly concerned with the impact of our actions and decisions on our stakeholders and the general public. We manage the risks associated with CPFL's business activities, always trying to bear in mind that the future depends on the decisions we take today.



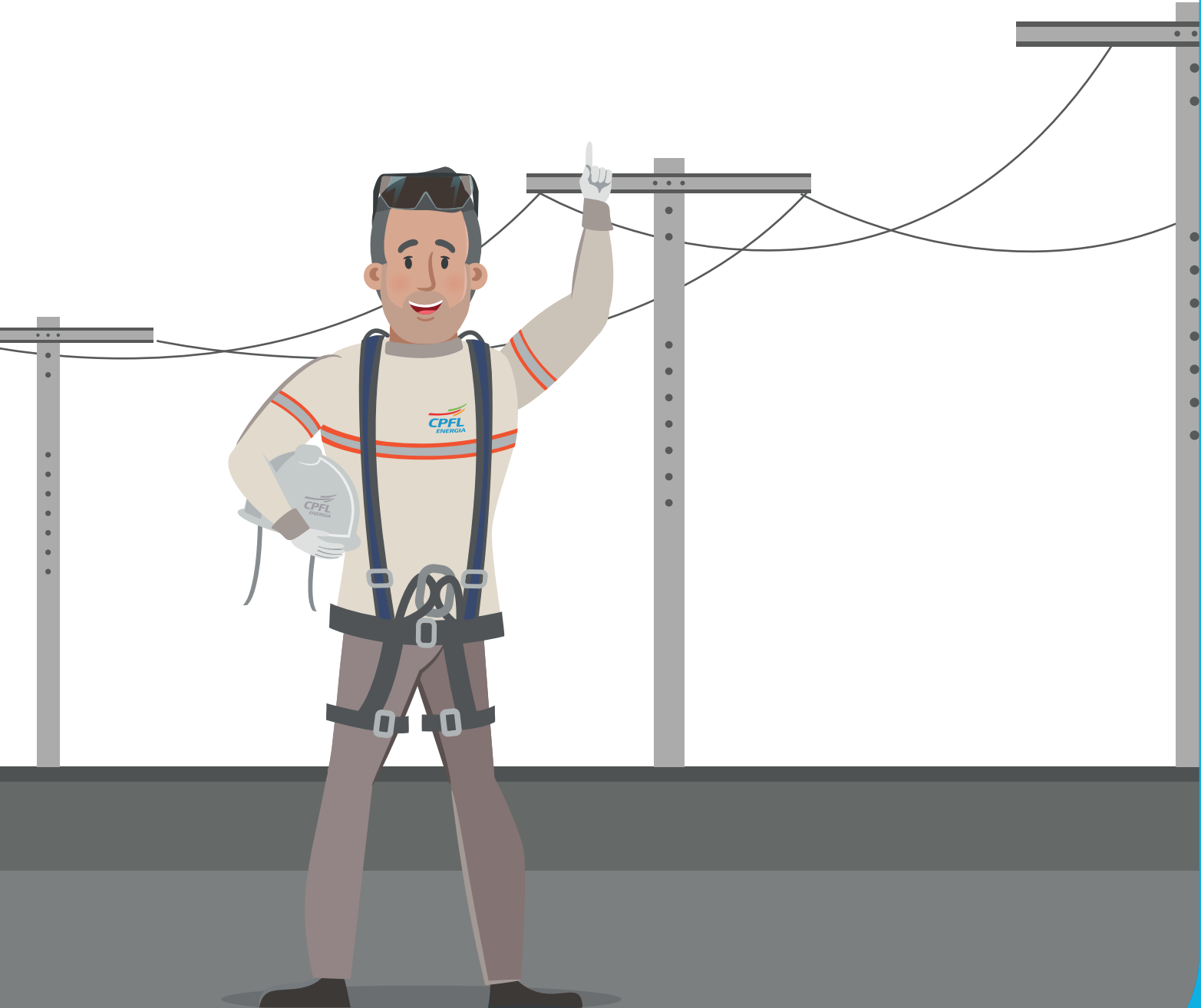
# 10.

We are deeply concerned with our planet's future and are aware that the future of CPFL depends on preserving the environment as it uses scarce and finite resources. We are committed to environmental preservation and rigorous assessment of the consequences of our programs and projects for the quality of life of future generations.



# 11.

Because we operate in one of Brazil's strategic industries, we are concerned with aligning our business strategy with the national development agenda, contributing to the country's growth, the socio-economic development of the communities where we operate, and the population's well-being.



# 12.

To ensure the fulfillment of these commitments, we have an Integrity Program to guide and direct our behavior and attitudes in accordance with this Code of Ethical Conduct and under the Ethics and Business Conduct Committee's supervision.



# 13.

## **Responsibility for complying with the values and guidelines defined in the Code of Ethical Conduct (Code).**

- a)** CPFL professionals, namely employees, managers, officers, members of the Board of Directors' Advisory Committees and Commissions (whether CPFL employees or not), and directors, must respect and comply with the guidelines defined in this Code, as well as act in accordance with the Company's policies and applicable laws and regulations.
  
- b)** Managers, Officers, and Directors must ensure that the values and guidelines for business conduct set forth in this Code guide decision-making in their respective operational areas while motivating their teams to share and use the Code.
  
- c)** CPFL representatives at companies with other partners/shareholders, whether subsidiaries of CPFL or not, must make their best effort to disseminate and implement this Code of Ethical Conduct or other code with similar minimum standards.
  
- d)** Suppliers, business partners and all those who act on behalf of CPFL shall adhere to the measures within the Code of Ethical Conduct for Suppliers in accordance with the guidelines, values, principles and commitments outlined in this Code.
  
- e)** Any conduct that breaches the Code shall be subject to disciplinary action.



## Human rights

Respect for human dignity shall be ensured to our employees and all the people who interact with CPFL. In this regard, we reaffirm our commitment to:

- a)** Zero tolerance for modern slavery work and use of child labor.
- b)** Initiatives focused on the quality of life and safety at work and in the community.
- c)** Fair and equitable professional opportunities in accordance with local laws.
- d)** Diversity and fair opportunities for all.
- e)** Combat all forms of harassment, bullying, prejudice and discrimination.
- f)** Freedom of association of employees.

## Valuing responsibility

- a) We have the freedom to refuse to follow orders that threaten our integrity or that of third parties, or that cause damage to CPFL, its image and property, or the environment.
- b) No one has the right to demand the practice of illegal acts or the violation of the ethical values and the business conduct guidelines established in this Code.
- c) We ensure freedom of expression and the right to obtain clarification and express concerns about conduct that we may consider to be in violation of this Code<sup>2</sup>.

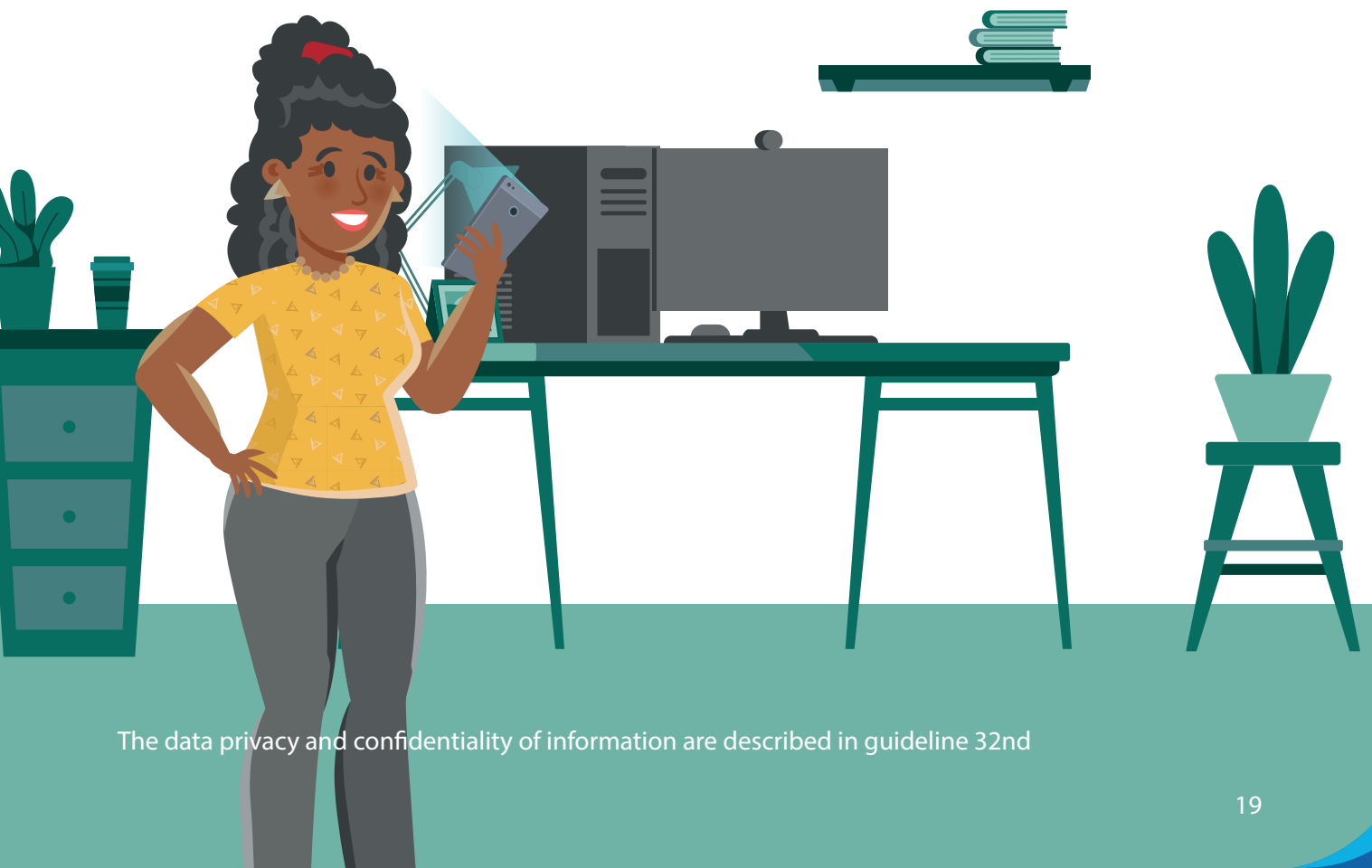


<sup>2</sup> For additional information on how to contact our whistleblowing channel, please visit: <https://www.grupocpfl.com.br/institucional/canal-de-etica>

# 16.

## Proper Disclosure of Information

- a)** We must only disclose correct, accurate, and transparent information about CPFL and adopt, when necessary, designed procedures to ensure the control, quality, security, and confidentiality of information.
  
- b)** We must follow and comply with the Company's guidelines on information security. In case of doubt, consult the Information Security Department, before taking any action.
  
- c)** We must not share system access credentials (logins/passwords) or identification badges, as they are personal data and, by virtue of which, confidential and non-transferable.



The data privacy and confidentiality of information are described in guideline 32nd

## Absence of conflict of interest

- a)** Integrity and transparency guide our professional and commercial relations. In this regard, we must avoid situations that create conflicts of interest, potential and apparent, that could impair our ability to make objective decisions or act in the CPFL Group's best interest in exchange for personal and/or third-parties gain.
- b)** We shall not engage in personal, business activities that pose a conflict and/or compete with the Company's activities, whether for remuneration or not, even if outside of normal work hours.
- c)** We shall not participate in purchase or sale negotiations with companies whose partners or directors may have a potential conflict of interest due to personal or family relationships<sup>3</sup>.

We shall always declare ourselves conflicted in a situation of conflict of interests and refrain from engaging in discussions or deliberations about issues in which we have conflicting interests, including by withdrawing from meetings. This behavior is applicable even if we are members of bodies of the high-level corporate governance structure, including the Board of Directors and its Advisory Committees.

<sup>3</sup> Example: parents, siblings, children, uncles, grandparents, cousins, partners, brothers- sisters- sons- daughters-in-law, stepchildren, spouses, etc.

# 18.

## Competitive practices

- a)** We shall follow and comply with the Company's rules regarding commercial negotiations and select suppliers based on impartial processes and strictly technical and commercial requirements.
- b)** Our relations with suppliers must take into account both parties' legitimate interests, with undue advantages, unfair competition practices, or situations of conflict of interest with the Company's activities, strictly prohibited.
- c)** We shall follow and comply with CPFL rules that prohibit hiring suppliers that violate labor laws, provide unsafe products or services, or that make use of forced labor or child labor.
- d)** We must not adopt actions that impair free competition and damage the image of our competitors.

## Proper employment relations

- a)** We must follow and comply with CPFL rules for the recruitment, evaluation, promotion, transfer, and termination of our employees, ensuring that the processes are fair, equitable, impartial, and transparent.
  
- b)** We may have family relationships within CPFL, but we may not report directly or indirectly to a relative, spouse or partner, nor be involved in situations that could create or appear to be a conflict of interest.
  
- c)** We may engage in other professional activities as long as they do not jeopardize professional performance, do not interfere with our work hours, and do not conflict with CPFL's business activities and interests.
  
- d)** We may not use our professional categories<sup>4</sup> associated with CPFL Group positions to obtain any type of privilege.

<sup>4</sup> For example, the Brazilian Bar Association (OAB), for lawyers, or the Regional Council of Engineering and Agronomy (CREA), for engineers...

## Respectful and professional relationships with customers

We must cultivate respectful and professional relationships with customers, free from any form of prejudice and discrimination, promoting and disclosing, when necessary, specific channels for receiving complaints about the quality and conformity of the products and services provided. Equally, we may not use our positions at the Company to give special treatment to any customer, including those with whom we have any type of family relationship or friendship ties.



# 21.

## Adoption of good practices in related-party<sup>2</sup> transactions

We must follow and comply with internal guidelines regarding related-party transactions<sup>5</sup>.



<sup>5</sup> Related parties are persons or entities related to CPFL Energia following CVM Deliberation 642/10, as amended, or any other that may replace it.



## Use of privileged information and adoption of good practices in securities trading

- a) We must follow and comply with CPFL's internal rules<sup>6</sup> regarding the trading of shares and other securities by ourselves and our family members.
  
- b) We must not use privileged information for profit-making purposes or obtain advantages in the purchase and sale of shares issued by CPFL companies. We must also not advise third parties based on privileged information<sup>7</sup>.

<sup>6</sup> Drafted in accordance with prevailing laws and regulatory standards as well as best market practices.

<sup>7</sup> That is not in the public domain. For additional information, see the Securities Trading Policy.

## Responsible use of company-owned resources

- a) We must protect and preserve the assets<sup>8</sup> of CPFL companies from inappropriate or improper use and treat them with diligence and care.
- b) We do not allow the use of CPFL's facilities or assets for the promotion of political or religious beliefs.



<sup>8</sup> Power plants, lines, networks, installations, vehicles, properties, equipment, laptops, cell phones, trademarks and the collection of knowledge, information, systems, processes, technologies and innovations.

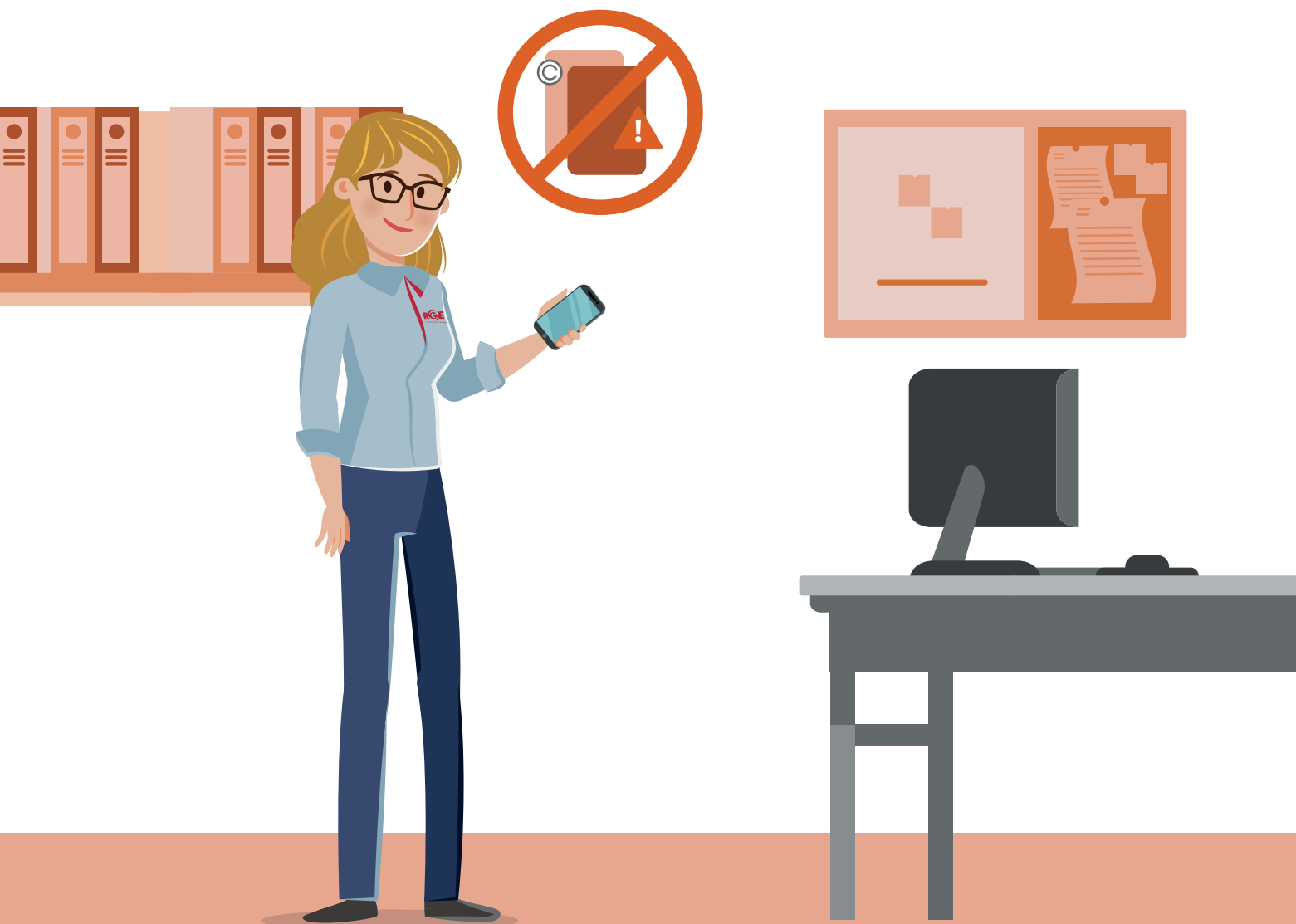
## Proper use of electronic media

- a)** We must follow and comply with CPFL rules regarding the use of e-mail, Intranet, internet and other electronic communication channels, and not disclose, internally or externally, messages that breach the Company's ethical principles, such as practical jokes, rumors, pornography, advertising, commerce, messages of a political or partisan nature, or send documents or information about the CPFL Group for personal purposes.
- b)** Employee participation and use of social media and other platforms must explicitly demonstrate that they are strictly for personal use and do not represent the CPFL Group's stance on the issue.



## Respect for intellectual property and copyright

We respect the copyrights and intellectual property of others and prohibit the use or sharing of unauthorized or illegally obtained copies of third-party materials, systems and software.



## Transparent and constructive relations with the Public Sector

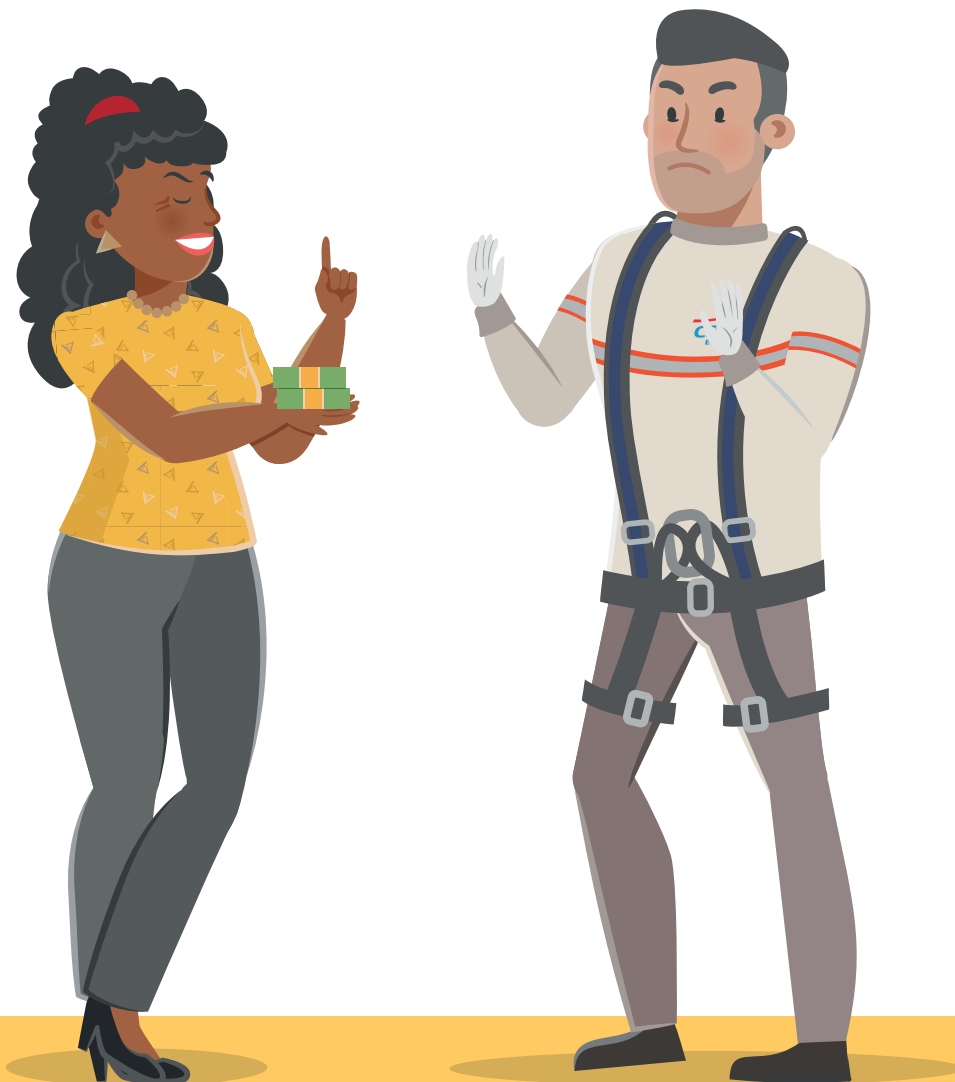
- a)** Our relations with the Public Sector<sup>9</sup>, both directly and indirectly, through third parties or representatives, must be transparent, ethical and in accordance with our internal guidelines<sup>10</sup>.
- b)** We collaborate with the Public Sector during its oversight of CPFL's practices.
- c)** We may participate in political or partisan activities on a strictly personal basis, outside of the work hours and the workplace, without adversely affecting CPFL's neutral and impartial stance concerning political candidates or parties<sup>11</sup>.
- d)** We do not use resources, programs and services, or associate CPFL trademarks with activities of a political or partisan nature.

<sup>9</sup> Government members, authorities and public servants.

<sup>10 11</sup> For additional information, see the Relations with Public Officials Procedure and the Candidate for Political Office Rules.

## Rejection of corruption and favoritism

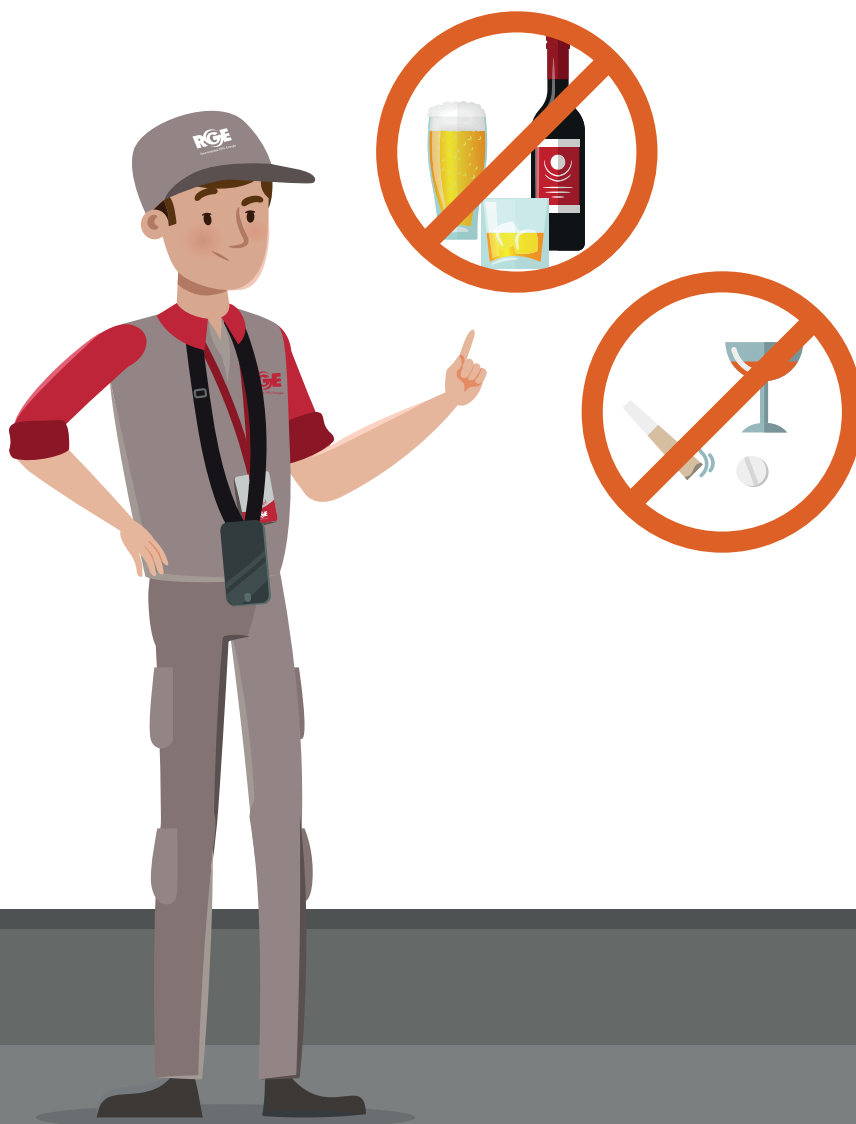
We conduct our business activities ethically and transparently and do not tolerate any form of corruption, payment facilitation, favoritism, extortion or bribery<sup>12</sup>.



<sup>12</sup> In compliance with Law No. 12,846/13.

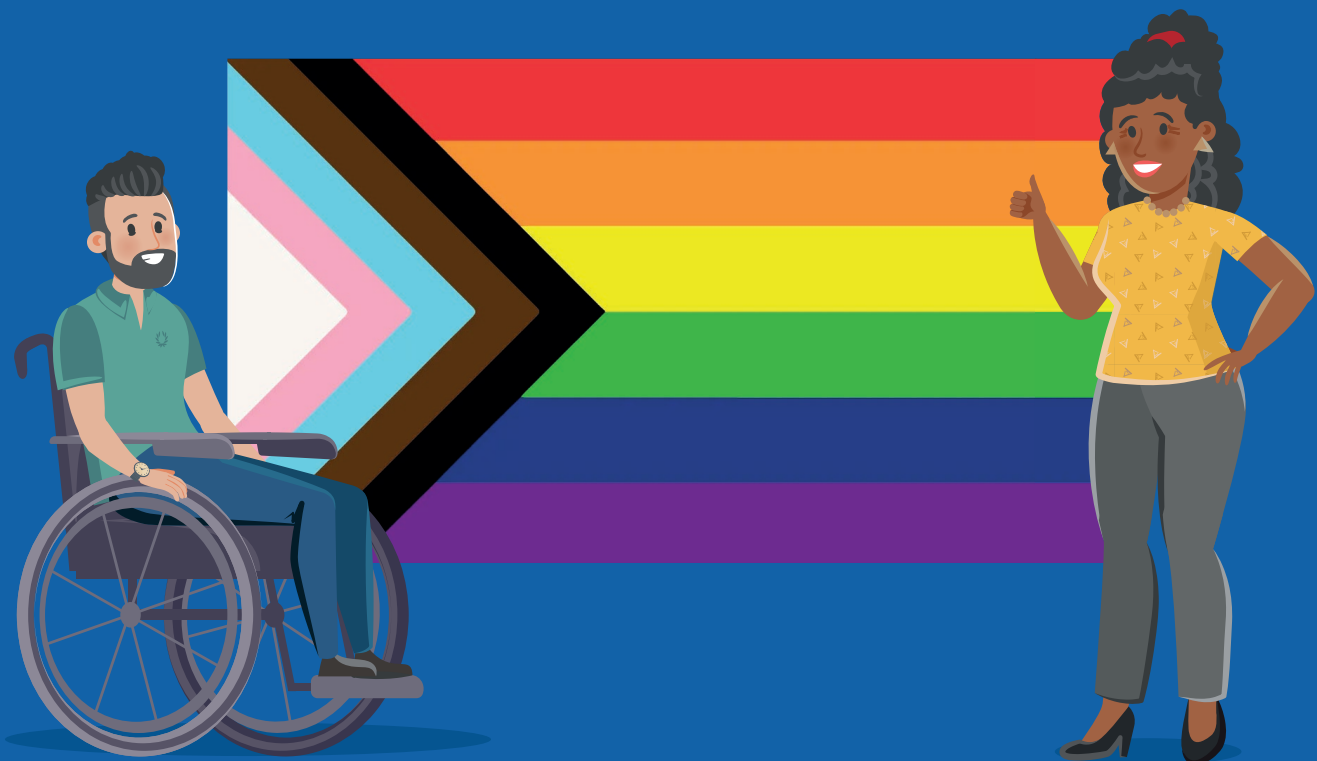
## Prohibition of socially inappropriate publicity, advertising and sponsorships

We must follow and comply with the Company's sponsorship and donation guidelines by not authorizing campaigns, advertising materials or sponsorships of events that involve or encourage the consumption of alcoholic beverages, tobacco, or illicit drugs, unduly expose children and adolescents, cause embarrassment, humiliation or the exclusion of individuals and groups, incite animal mistreatment, encourage environmental damage, or any other circumstances that may adversely affect CPFL Group's image.



## Prohibition of prejudice, discrimination and harassment

The CPFL Group has zero-tolerance guidelines for any form of prejudice and discrimination and is committed to investigating and combating situations involving inequity, moral harassment<sup>13</sup>, sexual harassment<sup>14</sup>, bullying<sup>15</sup>, humiliation, exposure to ridicule, intimidation, hostility, and discomfort due to color, race, sexual orientation, ethnicity, language, age, economic status, nationality, birthplace, physical, mental or psychiatric condition, kinship, religion, ideology, political position or any other situation that may diminish the human and working condition.



<sup>13</sup> "Moral harassment" is any repetitive and prolonged behavior aimed to impose some dominance over a person, causing feelings of humiliation, intimidation, offense or coercion, and potential damage to the individual's honor, dignity, and moral integrity

<sup>14</sup> "Sexual harassment" is the impertinent, inappropriate and undue insistence, explicit or disguised, to solicit sexual advantages or favors, aggravated when seeking to take advantage of influence, professional background, and hierarchical position.

<sup>15</sup> "Bullying" is the intentional and repetitive practice, made for pure fun, competition or revenge, often with the complicity of third parties, using mockery and scorn, aimed to have an intimidating effect (destructive, in some cases) on a vulnerable and defenseless person.



## **Support the promotion of quality of life and safety in the workplace and the community**

- a)** The CPFL Group provides a healthy environment and operates safely and responsibly, ensuring the health of our employees, customers, suppliers, service providers and communities.
  
- b)** We must know and practice the internal safety rules, correctly use protective equipment, comply with procedures and intervene whenever necessary to guarantee the physical, mental and emotional integrity of all the people involved.
  
- c)** We must communicate to leaders unsafe working conditions or situations involving severe imminent risk to the life or integrity of any individual.
  
- d)** The CPFL Group develops campaigns to guide and raise awareness among customers, service providers and the population about the safe use of electricity.

## Support measures to promote inclusion and professional development

- a)** We ensure that the performance evaluation and reward systems comply with criteria based on performance, potential, competence, and individual merit, and we prohibit undue favoritism or discrimination against people.
  
- b)** We support the promotion of social inclusion, based on differences, and equipment for guaranteeing equitable conditions of use and safety, the adaptation of work processes and accessibility.
  
- c)** We respect the right of freedom of association and collective bargaining, recognizing the legitimacy of trade unions and the internal system for employee representation, always acting with integrity and transparency.
  
- d)** Our work hours comply with national laws and applicable collective agreements.

## Limits on receiving, promotional gifts, gifts and hospitality

Receiving and giving promotional gifts<sup>16</sup> is allowed as long as CPFL's internal guidelines and good commercial relations are respected, without the intent of obtaining undue personal gains or advantages, compensation for a business deal, or exchange of favors or benefits, either implicitly or explicitly.

We may accept courtesy invitations to institutional events, seminars, fairs, conferences, and conventions as long as they meet the CPFL Group's legitimate purposes and internal approval criteria.

CPFL Group employees may not accept or provide gifts or entertainment, except in the case of formal events.



<sup>16</sup> Object without economic value, distributed as a practice of kindness and cordiality, as a courtesy, without expectation of compensation, marketing actions to promote the work, brand and presentation of services. Furthermore, they must not be of a personal and exclusive nature, in other words, intended for only one particular person.

## Prohibition of the use and consumption of alcohol, illegal drugs and weapons

- a) It is inadmissible to work under the influence of alcohol or illegal drugs.
- b) Possession, purchase or sale of illegal drugs is inadmissible on the CPFL Group's premises.
- c) Employees shall not store or carry any kind of weapon on the CPFL Group's premises and during work hours unless this is a fundamental part of their activities.



## Respect for privacy and data confidentiality

CPFL implements appropriate technical and organizational measures to ensure that duly authorized data sharing takes place in a way that guarantees confidentiality and prevents improper access or situations that result in the destruction, alteration, loss, communication, or any other form of unlawful or accidental processing of data.

All employees, suppliers and stakeholders who support us in carrying out business activities also share our commitment to confidentiality, the protection of our customers' personal data and the security of information related to the CPFL Group's processes and when handling personal data to which they had access in the CPFL Group, must at least:

- a)** Respect the purpose(s) defined by the Company for the processing of personal data;
- b)** Comply with the company's data protection and information security policies, rules and procedures and applicable laws and regulations, notably the General Data Protection Law (Law 13.709/2018);
- c)** Make their best effort to keep personal data safe and confidential (whether in paper or electronic form) and act to prevent improper disclosure and/or breaches of personal data.

## CPFL Group's Integrity Program

The Integrity Program is a set of internal devices and procedures designed to ensure that the CPFL Group's business activities are conducted in accordance with the principles set forth in this Code of Ethical Conduct and is composed of 4 pillars:

- a) Guidelines:** internal rules, policies and regulations;
- b) Communication:** annual Compliance communication plan, periodic training and external ethics channel;
- c) Assessment:** mapping of areas and duties with higher exposure to the risk of corruption, ethical deviations and improper conduct;
- d) Monitoring:** Compliance indicators, reports and the Ethical Conduct Committee.

## Ethics and Business Conduct Committee (Committee)

- a)** The Ethics and Business Conduct Committee's mission is to assist CPFL Group companies and their stakeholders in implementing, disseminating, training, applying, and defending the ethical principles and values defined in this Code of Ethical Conduct. In this sense, it is responsible for reviewing and updating this Code and the reporting channel.
- b)** The CPFL Board of Directors establishes the number of members.
- c)** The Committee will be composed of 04 (four) members: 03 (three) from the Company's Board of Executive Officers, namely the Chief Executive Officer (CEO), the Legal & Institutional Affairs Vice President, and the Executive Vice President, and 01 (one) independent member, each serving a two-year term with reelection allowed.
- d)** The Committee shall decide on consultations, suggestions, and reports of infringements of the Code and guide the application of its rules by means of responses to consultations and campaigns.
- e)** The structure and functioning of the Committee shall be established in the internal regulation approved by the CPFL Board of Executive Officers, based on the Committee's proposal.
- f)** CPFL Energia's Board of Directors may replace the Committee in its duties in cases of violations of the Code's guidelines committed by members of the Committee, the Board of Executive Officers, or the Board of Directors.

## Receipt and processing of complaints

- a)** The Ethics Committee's Internal Regulation sets rules and procedures for receiving and verifying reports of violations of the Code and the Company's internal policies, as well as the application of its provisions.
- b)** The CPFL Group has an independent reporting channel<sup>17</sup>, managed by a third-party company that ensures the confidentiality and anonymity of the whistleblower, and encourages its employees, suppliers, customers and stakeholders to use it to communicate behaviors that may imply the infringement of the provisions in this Code, as well as of policies, laws and regulations applicable to the CPFL Group.
- c)** The CPFL Group shall not tolerate any possibility of retaliation or persecution as a result of a good-faith report, and any action in this regard may be considered a violation of this Code and the CPFL Group's principles.
- d)** Any conduct that breaches the Company's Code of Ethical Conduct shall be subject to disciplinary measures.

<sup>17</sup>To report any conduct that potentially violates the Code of Conduct or the Company's policies, access <https://www.grupocpfl.com.br/institucional/canal-de-etica>





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