



Code of Ethical Conduct

For Suppliers

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INTRODUCTION

The values and guidelines defined in this Code must be practiced by all Suppliers of the Holding CPFL Energia S.A and all its direct and indirect subsidiaries (“CPFL Group”).

The commitment to sign contracts with transparency and to value suppliers who are committed to respecting ethics, health and safety at work, the environment, as well as human rights is formally assumed by the CPFL Group with the creation of this Code of Ethical Conduct for Suppliers.

Suppliers are fundamental to the development of the CPFL Group’s business. Therefore, CPFL Group reaffirms its intention to strengthen the relationship within the scope of ethics and integrity.

The CPFL Group has a position of neutrality regarding political and religious issues and does not tolerate any form of discrimination and prejudice.

At any time, compliance with the guidelines set out in this document may be monitored.

Finally, suppliers have communication channels available for reporting any misconduct or suspicious conduct that violate the terms of this Code.



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OBJECTIVE



The Code of Ethical Conduct for Suppliers aims to establish ethical and transparent conduct in business relations with companies that provide services and products to the CPFL Group.

The CPFL Group seeks to objectively, clearly, and effectively address all its values, principles and commitments assumed herein for business development, and as such, this document must be observed in accordance with the CPFL Group Code of Ethical Conduct, available at <http://www.cpfl.com.br/etica/>.

The selection and contracting of suppliers are based on technical, strategic, economic, professional and ethical criteria, taking into account the CPFL Group's needs.

In addition, contracting is carried out through objective, predetermined processes, such as bids or price quotations which ensure the best cost-benefit ratio for the CPFL Group.

The CPFL Group seeks excellence in its services and, in order for this to be possible, our suppliers must be aligned with our principles, values and guidelines.

The contract will be based on the values of the CPFL Group.

3 RESPONSIBILITY

Suppliers are treated with respect, without privileges or discrimination of any kind, regardless of their turnover with the CPFL Group.

Suppliers shall ensure compliance with this Code, as well as take action in cases of non-compliance with these conditions by their contracted and subcontracted suppliers, with the aim of ensuring adherence to CPFL Group guidelines.

The CPFL Group considers a supplier's compliance with this code when making business relationship and procurement decisions.

Suppliers must provide sufficient documentation to demonstrate compliance with this Code as well as current legislation.

Suppliers must respond promptly to requests from the CPFL Group or third parties working on behalf of the CPFL Group regarding matters covered by this Code.

Suppliers shall disseminate this Code's guidelines to their employees and their subcontractors, taking responsibility for the integrity of their conduct.

The pursuit of financial results can't justify a breach of behavior, which may constitute misconduct.



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HEALTH AND SAFETY



The CPFL Group is concerned with the health and safety of everyone involved in its supply chain.

Therefore, to perform any service, work, or activity, suppliers must comply with all requirements regarding occupational safety, working conditions, hygiene, and occupational health established in federal, state, and local laws.

5 HUMAN RIGHTS



The CPFL Group respects and promotes human rights in its activities and procedures.

In this regard, it seeks to establish relationships with suppliers who share the same principles and values, including: decent working conditions and in accordance with labor and social security obligations; respect and valuing diversity; inclusion of people with disabilities in the supply chain; prohibition of child, slave or slave-like labor; and not admitting the exploitation of children and adolescents in their processes and/or in their supply chain.

The company seeks to combat all forms of prejudice, discrimination, harassment, sexual misconduct, violence and any other situations that may degrade the human image and condition.

6 ENVIRONMENT AND SUSTAINABILITY

The CPFL Group is committed to providing sustainable, accessible and reliable energy at all times with total respect for the environment, surrounding communities, suppliers and other stakeholders, in line with its sustainability and ESG strategy.

We promote the continuous improvement of environmental performance in our activities, complying with environmental legislation, preventing pollution, preserving biodiversity and respecting the particularities of each project.

Suppliers are an important part of the Company's value chain and must contribute to an efficient environmental policy, as well as fulfill with all pertinent obligations under the legislation applicable to their activity.

In this context, suppliers must manage their operations responsibly, taking into account the risks and environmental aspects of the activity, adopting a preventive stance in their operations, making their employees aware of the conscious consumption of natural resources and the need to maintain a good relationship with external public authorities.



7 BRIBERY, CORRUPTION AND FAVORS



The CPFL Group is opposed to any illicit act, and it is of utmost importance that any commitment to fighting against favoritism, fraud and corruption is transmitted transparently to suppliers and that they fully undertake to give effect to such commitment, including compliance with Anti-Corruption Law No. 12,846/2013, during the contractual term.

Any violations by suppliers or third parties may be subject to contractual penalties, including contract termination and other applicable legal measures.

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FAIR COMPETITION AND ANTITRUST PRACTICE



The CPFL Group suppliers must comply with all applicable fair-trade practices, fair competition, and antitrust laws in order to guide their actions in competitive environments and to value corporate practices that encourage free competition, in accordance with legal principles and best market antitrust practices and must not adopt actions that harm the reputation of competitors.

Relations with suppliers must consider the legitimate interests of both parties, not admitting undue advantages and unfair competition practices.

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CONFLICT OF INTEREST

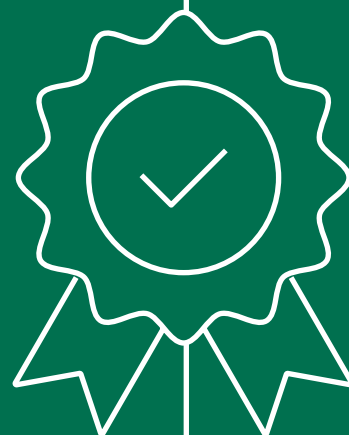
Our professional and commercial relationships are guided by integrity and transparency. Therefore, we must avoid and always report situations that generate conflicts of interest, even if apparent, that may influence the ability to make objective decisions or act in the best interests of the CPFL Group in exchange for our own benefit and/or that of third parties.

Any violations by suppliers or third parties may be subject to applicable legal and contractual measures.



10

GIFTS AND SOUVENIRS



CPFL Group's suppliers must not offer gifts or advantages to any employee, subcontractor or third parties.

In limited circumstances, only promotional and institutional gifts which have no commercial value and which may be publicly disclosed without causing embarrassment to the Company and the professional may be offered, as already stated in the CPFL Code of Conduct and Ethics.

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DATA PROTECTION AND PRIVACY



At the CPFL Group, the data protection rights of all individuals and partners are respected.

Accordingly, suppliers must also respect and treat personal data with confidentiality, keeping them protected through processes and teams dedicated to their treatment and security controls.

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CONFIDENTIALITY



Meticulous confidentiality protects the material and intellectual property of the business, and the disclosure of undisclosed information may cause financial losses, even affecting the partnership relation between the CPFL Group and the supplier.

Suppliers must keep under confidentiality any type of information related to business partnerships established with the CPFL Group and must not disclose such information and/or use it improperly for their own benefit or that of third parties.

13 DOUBTS AND ETHICS CHANNEL

In the event of doubts regarding any item covered by this document or other issues not covered herein, suppliers should contact their CPFL Group relationship contact or, if preferred, use the CPFL Group's Ethics Channel to clarify any doubts.

The Ethics Channel is available to the public, including all suppliers and subcontractors. It is an independent tool, managed by a third-party company, which guarantees confidentiality and anonymity of information's for reporting violations or suspected violations regarding non-compliance with any of the rules within this Code of Conduct for Suppliers of the CPFL Group.

It is not allowed the retaliation against good-faith whistleblowers regarding records of violation of this Policy or other Integrity Program and Anti-Corruption and Anti-Bribery rules, and its occurrence will be considered a violation of CPFL Energy Group's ethical principles.

The CPFL Group does not tolerate any possibility of retaliation or persecution arising from a complaint and considers any actions in this regard to be a violation of this Code and the principles of the CPFL Group.

The means of contacting the Ethics Channel are available on CPFL Energia website at the following address:

<https://www.cpfl.com.br/institucional/etica-na-rede/canais-de-acesso/Paginas/default.aspx>



Term of Commitment

As a supplier of the CPFL Group, I hereby declare that I have received, read and understood the document “Code of Ethical Conduct for Suppliers”, which provides guidance on the main ethical aspects, values and commitments expected between the parties and I freely undertake to follow all the guidelines set out therein.

I am aware that the conduct of the company I represent, and my personal conduct are based on the ethical and professional standards described in this Code, and it is my responsibility to both respect and value it and to ensure that it is fully complied with.

This Term of Commitment becomes an integral part of the contract signed with the CPFL Group.

Company

CNPJ

Address

Name, position and CPF (social security or individual taxpayer identification number) of the legal representative(s)/attorney(s) of the supplying company

Signature, place and data

