

Ethics Guidelines

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HAI Inovação e Serviços Tecnológicos Ltda.

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Ethics Guidelines – HAI v1

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SUMMARY

As a person and employee, we are faced with ethical challenges very often. We must always rely on our basic principles and act accordingly to overcome those challenges. In this document, we provide guidelines as to how we should behave in the work environment. By 'work environment' one should understand any place or situation related to anyone's duty as a HAI employee.

These guidelines and principles must be accepted and stewarded by all our employees.

APPROVED BY João N. E. Carneiro	SIGNATURE
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1. MISSION, VISION AND VALUES

It is of paramount importance that everyone at HAI understands clearly our **mission** statement, adheres to our **vision** and shares our basic **values**.

These elements should be seamlessly embedded in our company culture, in our work practices and correctly communicated both internally and externally. HAI leadership should nurture the company culture in a way that establishes the correct awareness in this regard.

Our mission, vision and values are stated below.

OUR MISSION

We support energy companies with optimization and improvement of their digitalization journey by providing user-centric software and services solutions incorporating State-Of-Art data driven and physics-based models.

OUR VISION

At HAI we are working to become a leading provider of unique software solutions that drive industry innovation enabling energy companies to perform more efficient, safer and environmentally sound operations.

OUR VALUES

- We are a **MARKET-DRIVEN** company with an **ENTREPRENEURIAL** spirit.
- Our team is made of **BOLD** thinkers with **INNOVATIVE** ideas and **SCIENCE** incorporated in their DNA.
- We are **COLLABORATIVE** at heart and **ADAPTABLE** to foster consolidated business relationships with all our stakeholders.

2. CORE PRINCIPLES

Our attitude as HAI employees must be guided by our core principles of honesty, trust, courage and responsibility.

- Everyone must be committed to value and protect our basic knowledge, and that of whom we work with.
- Everyone must contribute to a working environment that encourages the generation of new and innovative ideas.
- Everyone must respect our own organizational structures and that of whom we work with. We value a flexible, multi-competence working place and encourage a proactive attitude of all employees toward continuous personnel development, and act to share your own knowledge and ideas with others.
- Everyone must apply careful working methods in all activities with a traceable record, careful and detailed documentation. The documentation includes all internal and external communication, all project documents and results, technical specifications, implementation reports, software files, source codes, drawings, and others, also allowing **reproducible results** by other employees.
- Everyone must ensure that sound scientific and engineering methods are employed to solve the problem at hand, and the appropriate software tools are used, strictly restricted to those for which HAI has a valid license of use. If you have any doubts or concerns whatsoever refer immediately to your peers or leaders.

3. RELATIONSHIPS WITH SUPPLIERS, PARTNERS AND CLIENTS

HAI will conduct its business in a way that gives our partners, suppliers and clients confidence in our organization.

We expect and require all our employees, suppliers, partners and clients to share our ethical values.

4. FAIR COMPETITION

HAI will compete in a fair and ethically correct manner, within the framework of current rules of competition.

We will also not prevent others from competing with us.

5. ANTI-BRIBERY AND CORRUPTION

- a. HAI strictly adheres to Brazilian anti-corruption laws and regulations, including Law 12.846/2013.
- b. Our anti-corruption guidelines apply to all employees, officers and directors, as well as any direct intermediaries.
- c. HAI prohibits bribery in any form, direct or indirect. A bribe is not defined by a specific amount of money or gifts changing hands. A bribe may include any offering, giving, or receiving, of payments, lavish or excessive entertaining, favors, gifts, other inducements, or anything else of value in order to gain an unfair business advantage.
- d. No HAI officer, director, employee or other representative may, directly or indirectly, offer, promise, pay, give, or authorize any financial or other advantage, or anything else of value, to any other person or organization, with the intent to exert improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage or improperly reward the recipient for past conduct. This prohibition applies with special force to benefits provided to Government Officials.

Corruption undermines trust in the constitutional state and in democratic institutions, weakens ethical and moral values, hampers rationalization and efficiency, and undermines every kind of business activity and free competition.

Corruption can ruin a reputation and puts HAI and the individual at risk.

6. FACILITATING PAYMENTS

Facilitating payments are small payments aimed at helping to get a contract or supplies through, or to expedite a service to which one is entitled, such as permission to proceed through passport control. HAI is opposed to these kinds of payments, even when they are legal, and their legality must be documented. HAI will strive to prevent making these forms of payments.

7. POLITICAL ACTIVITIES

HAI is politically neutral.

8. EQUALITY AND DIVERSITY

Everyone is of equal value at HAI. No discrimination and bullying of any kind will be acceptable, whether it is on the basis of race, gender, religion, sexual orientation, age or any other matter.

HAI will strive to create a good working environment, characterized by equality and opportunity.

Similarly, any type of harassment is strictly prohibited.

If you believe you have been discriminated, bullied or harassed in any sense, immediately report the incident to your direct leader.

9. SAFE AND HEALTHY WORKPLACE

At HAI, we are committed to a safe, healthy, and violence-free work environment. Any conduct that poses risk to the safety, health or security to our employees, partners, clients or visitors is firmly prohibited. If you become aware of any such risk, you should report it immediately to your direct leader. In case of any emergency in the work environment you should first contact an emergency responder or call local authorities directly.

Our position on substance abuse is that it is not compatible with the health and safety of our employees and is not compatible with our work environment. We do not permit it. Consumption of alcohol is not banned at our premises, in business meetings or events, but good judgment should be employed to prevent impaired performance or inappropriate behavior, endangered safety of others, or violation of the law.

10. CONFLICTS OF INTEREST

Conflict of interest is a situation that causes you to pursue a personal benefit for you, your contacts, or your family at the expense of HAI. Although not exhaustive, some examples are cited below:

- As stated in your employee's contract, any business opportunities found through your work at HAI belong primarily to HAI, except as otherwise agreed to by the company.
- Seeking to pursue a new position with partners or clients during your direct engagement with such partners or clients through direct business relations with HAI (e.g. joint projects) may represent a conflict of interest.

- Developing or helping to develop outside products, tools or any inventions that enter in direct competition with HAI's businesses represents a clear conflict of interest.
- Any outside employment, board memberships, advisory roles, as well as starting your own business that can represent direct competition with HAI should be regarded as a conflict of interest

Accepting small gifts, entertainment, and other business courtesies is not generally considered a conflict of interest, as long as they are not excessive or create the appearance of impropriety.

If you find yourself in a situation that represents a potential conflict of interest, avoid it and seek counseling with your direct leader.

11. COMPLIANCE

Compliance to our Ethical Guidelines is very important to us, as well as to the contracts, agreements, regulations and laws our operations are subjected to. As a HAI employee everyone is obliged to strictly follow current guidelines, bound by the labor contract signed with the company.

Each of us has a personal responsibility to incorporate, and to encourage others to incorporate these guidelines into our daily work. Should any question arise concerning yourself or any of your fellow HAI colleagues, or even the company itself may be falling short of the present commitment, you may report immediately to compliance@hybridai.com.br. HAI prohibits retaliation against any employee who reports a possible violation of our Ethical Guidelines, or the law.

Compliance to the current Ethical Guidelines is also seen as an important part of the personal development at HAI, and to the company development itself. At least every year all employees are entitled to a Personal Development Interview with HAI management, where own work and business practices are also evaluated under the light of the current guidelines.