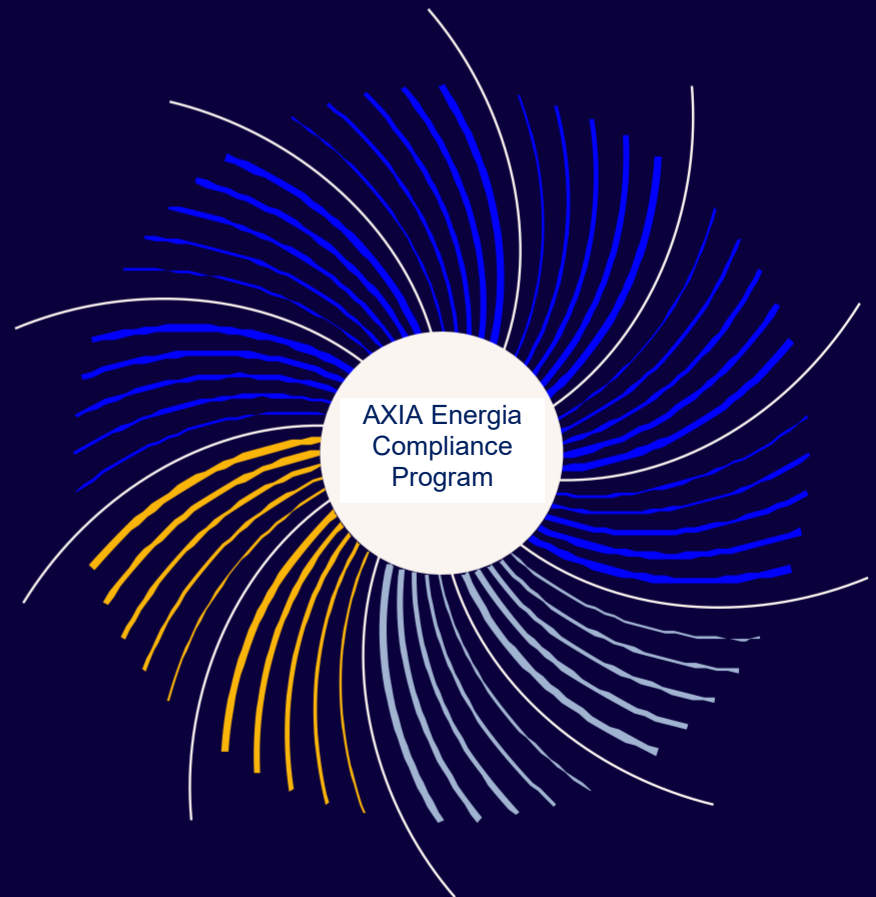
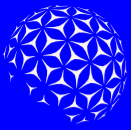


AXIA ENERGIA



**GUIDE TO COMBATING SEXUAL
AND MORAL HARASSMENT**



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GUIDE TO COMBATING
SEXUAL AND MORAL
HARASSMENT

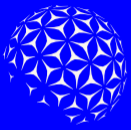
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GUIDE TO COMBATING SEXUAL AND MORAL HARASSMENT

1. INTRODUCTION

The overall health of professionals is essential for the sustainability of any organization. When professionals are healthy in all aspects — physical, mental, spiritual, and in their interactions in professional and personal environments — they become more satisfied, engaged, and productive. However, this well-being can only be achieved in a safe work environment where respect prevails and any form of harassment is firmly combated.

AXIA expresses its commitment to combating psychological violence, moral harassment, and sexual harassment in its Code of Conduct.

AXIA encourages respect, courtesy, and collaboration among people in the work environment, contributing to the integration of professionals and the development of teamwork.

The company cares for the physical and mental health of professionals and, in this sense, prohibits and rejects any manifestation of psychological violence or harassment, whether of a moral or sexual nature.



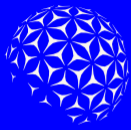
SHOULD

- Encourage the free expression of ideas while rejecting threats of any kind in work relationships;
- Take preventive measures to prevent any form of physical, sexual, moral, or psychological violence;
- Report to the Whistleblowing Channel any act of physical or psychological violence, such as discrimination, threats, and blackmail, or of an offensive and hostile nature, which may be interpreted as insult, slander, defamation, moral or sexual harassment.



SHOULD NOT

- Have or allow behavior, including gestures, language, and physical contact, which is sexually coercive, threatening, abusive, or exploitative;
- Engage in acts of vandalism, destruction, lewd behavior, or attitudes involving physical, verbal, or gestural violence;
- Be complicit in harassment of any kind;
- Allow personal pursuits, beliefs, characteristics, or interests to interfere with how you treat professionals and the public in general, as well as colleagues at higher and lower hierarchical levels.



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2. GUIDE OBJECTIVE

This guide highlights the importance of preventing inappropriate behavior, encouraging a culture of respect, support, and appreciation for each professional. In doing so, it strengthens the overall health of AXIA professionals.

3. CONCEPTS

MORAL HARASSMENT

This involves repeated attacks through crude gestures and inappropriate words, malicious comments, prejudiced or discriminatory insults, bullying, intimidation, inappropriate jokes that humiliate the professional, even affecting their psychological well-being and keeping them away from work. Although not always explicit, the harasser's intention is generally to harm the victim, creating a hostile and unsustainable environment.

FOR A CONDUCT TO BE CONSIDERED MORAL HARASSMENT IT MUST:

- Be habitual, that is, occur in a repeated manner for a certain period;
- Be intentional and abusive, that is, have a discriminatory purpose;
- Be directed at a specific person or group.

Although it may occasionally be perceived in the workplace, moral harassment can also occur in other environments, as long as its practice is related to the power relations developed in the professional sphere. Moral harassment can be practiced by one or more people.

Moral harassment can manifest itself in the following ways:

1. VERTICAL:

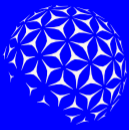
It occurs when work relationships are marked by a difference in hierarchical position.

And it can be divided into two types:

Downward: harassment practiced by a superior, from top to bottom;

Upward: harassment practiced by a subordinate, from bottom to top;





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3. CONCEPTS

Moral harassment can manifest itself in the following ways:

2. HORIZONTAL:

It occurs when people are at the same hierarchical level, that is, among peers, without a subordination relationship;



3. MIXED OR COLLECTIVE

In this case, harassment occurs from superiors and from coworkers with whom there is no subordination relationship.



EXAMPLES OF MORAL HARASSMENT SITUATIONS:



Public humiliation:

a superior calls attention to an employee in front of all colleagues, using offensive words, ridiculing their abilities or mistakes in a disproportionate way;



Excessive and unjustified criticism:

a supervisor constantly criticizes a subordinate's work in a destructive manner, without offering guidance or support, making any task unsatisfactory;



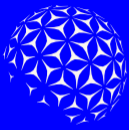
Constant threats:

a boss repeatedly insinuates that an employee may lose their job if they don't meet unattainable goals or don't agree to certain conditions, creating an atmosphere of fear;



Work overload:

a leader constantly delegates to an employee a disproportionate amount of work, knowing that they won't be able to meet deadlines, with the intent to wear them down physically and emotionally;



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3. CONCEPTS



Work sabotage:

an employee is deliberately overloaded with impossible tasks to complete on time or receives confusing instructions, in a way that compromises their performance and makes them appear incompetent;



Exclusion from growth opportunities:

a supervisor prevents an employee from participating in training, important projects or promotion opportunities, harming their professional development;



Ignoring or devaluing efforts:

an employee is constantly ignored in their contributions, suggestions or accomplishments, while other colleagues receive recognition for less efforts;



Social isolation:

a team deliberately excludes a colleague from meetings, lunches or social work activities, leaving them isolated and marginalized;



Slander:

a colleague spreads rumors or false information about another employee, damaging their reputation within the company and undermining their credibility;

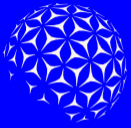


Insinuations or malicious comments:

making cruel jokes or malicious comments about a coworker's appearance, beliefs, or personal characteristics, repeatedly and with the intent to hurt or disqualify;



Making dismissive gestures, changing the tone of voice, or threatening with other forms of physical violence.

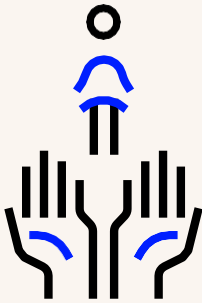


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3. CONCEPTS

Specific examples of moral harassment against women:



- Dismissing outright the technical opinion of a female professional;
- Making it difficult or preventing pregnant women from attending medical appointments;
- Interfering in women's family planning by requiring them not to become pregnant;
- Disregarding medical recommendations when assigning tasks;
- Systematically interrupting a woman before she finishes what she is saying.



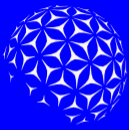
**BUT PLEASE NOTE: NOT EVERYTHING
CONSTITUTES MORAL HARASSMENT.**

WHAT IS NOT MORAL HARASSMENT?

Management actions without discriminatory intent, linked to the interests of the administration or the company and that are reasonable - a firm but fair leadership style that demands high performance within reasonable standards and without disrespecting or humiliating subordinates cannot be confused with harassment.

For example:

- Demanding results and meeting deadlines in a fair and proportional manner;
- Transferring an employee to another department or another work position, for workforce rationalization/readjustment based on clear and justifiable criteria;



3. CONCEPTS

- Monitoring punctuality and team productivity within reasonable parameters;
- Constructive criticism or negative evaluations based on work performed, when delivered in a respectful manner and with the goal of improving performance;
- Applying disciplinary measures, such as warnings or suspensions, is also not moral harassment, as long as it respects internal rules and is proportional to the violation committed.

Occasional conflicts between colleagues or with management - Conflicts and disagreements about ideas and opinions are natural and part of social interaction in the workplace. Conflicts differ from moral harassment when:

- They are sporadic or isolated incidents.
- They are expressed in a clear, direct and candid manner, through occasional confrontation rather than hidden persecution;
- They do not involve humiliation or continuous intimidation.



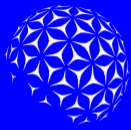
Remember: the difference between strict management and moral harassment lies in the intent, the repetition of the behavior, and the ongoing negative impact it has on the victim's well-being.

SEXUAL HARASSMENT

It occurs when a person feels pressured by someone seeking to obtain sexual advantage or favor, or who places them in an unwanted sexual context, which can occur within the work environment or through professional relationships, creating a climate of intimidation, hostility or discomfort for the victim.

This type of harassment can take many forms, from seemingly harmless attitudes, such as jokes or sexual comments, to physical advances and direct coercion to obtain sexual favors.

It is important to note that sexual harassment is not limited only to interactions between coworkers.



3. CONCEPTS

Sexual harassment can be committed by:

- Supervisors;
- Subordinates;
- Customers;
- Suppliers;
- Anyone with whom the individual has contact in a professional context.

SEXUAL HARASSMENT IS A CRIME AND MUST NOT BE TOLERATED.

It is defined by law as the act of constraining someone, with the intent to obtain advantage or sexual favor, with the agent taking advantage of their hierarchical superior position or ascendancy inherent to the exercise of employment, position or role. (Penal Code, art. 216-A). When committed in the work environment it is considered serious misconduct, warranting dismissal for just cause, according to the Consolidation of Labor Laws.

Sexual harassment can take the following forms:

Vertical harassment:

occurs when a man or woman is in a higher hierarchical position and takes advantage of their "boss" position to constrain someone with intimidation, pressure or even other interference, with the goal of obtaining some sexual favor.

Horizontal harassment:

occurs when the person harassing and the one being harassed are at the same hierarchical level.



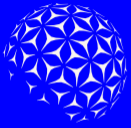
NO IS NO!

"Remember that to characterize sexual harassment, the LACK of consent from the harassed person is ENOUGH"



STAY ALERT!

Unlike moral harassment, it is not necessary for the act to be repeated to constitute sexual harassment. A single act can be considered if the intent is sexual in nature.



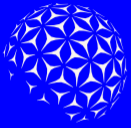
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3. CONCEPTS

EXAMPLES OF SEXUAL HARASSMENT

- Making sexual comments about a colleague's physical appearance, such as complimenting body parts in an inappropriate way or suggesting that the person dresses in a provocative manner;
- Telling jokes with sexual content or making double entendre insinuations that cause discomfort;
- Touching, hugging, or attempting to kiss someone without consent;
- Putting your hand on parts of someone's body in a way that causes discomfort to the other person;
- Showing or sending images, videos or texts with explicit sexual content to a colleague, whether in person, by email or by text message;
- Offering promotions, salary increases or other professional benefits in exchange for sexual favors;
- Threatening dismissal, demotion or other professional harm if the person does not yield to sexual advances;
- Using personal information to coerce someone into maintaining a relationship or sexual act;
- Making gestures or emitting sounds of a sexual nature;
- Raising inappropriate questions about someone's sexual life;
- Persistent unwelcome invitations.



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SEXUAL AND MORAL HARASSMENT

4. CONSEQUENCES OF HARASSMENT FOR VICTIMS

For victims, the damage from moral or sexual harassment can be irreversible, as it affects their physical and mental health, impacts their family relationships and their professional development. The victim loses confidence in themselves, becoming a distrustful person or simply unmotivated, becoming unable to gather enough energy to seek a new job.

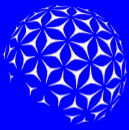
Symptoms can be presented in the body and mind as:

- Anguish;
- Depression;
- Insomnia;
- Feelings of failure and worthlessness;
- Loss of appetite;
- High blood pressure;
- Suicidal thoughts or attempts.

Harassment can also affect the work environment, causing employees to show low productivity and lack of motivation, creating an atmosphere of fear.

5. CONSEQUENCES OF HARASSMENT FOR PERPETRATORS

Not being a tolerated behavior by AXIA, proven cases of moral and sexual harassment can lead to dismissal for just cause. In the case of sexual harassment, the victim can also take legal action against the perpetrator, since the violation is a crime.



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GUIDE TO COMBATING
SEXUAL AND MORAL HARASSMENT

6. COMBATING HARASSMENT AT AXIA ENERGIA

WHAT DO WE DO TO PREVENT AND COMBAT HARASSMENT SITUATIONS?

The work environment should provide, above all, respect for human dignity. The practice of harassment deteriorates this environment. Building a healthy social space is everyone's responsibility.

Managers, in turn, must prioritize the well-being of their team and monitor the work environment, alert to any signs of uncomfortable situations that could characterize some type of harassment among their team members.

This guide is a starting point for combating and preventing moral and sexual harassment, as information is the main tool we have to understand situations and what they represent, so we know how to face them.

Professionals can deepen their knowledge on the topic through training related to: Moral Harassment in the Work Environment, Sexual Harassment, and Diversity and Inclusion, available on the Learn More platform which can be accessed through the intranet.

HOW DO WE ADDRESS HARASSMENT SITUATIONS THAT ARISE?

AXIA provides appropriate channels for both support and reporting situations that characterize harassment.



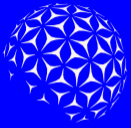
PROFESSIONAL AND DEPENDENT SUPPORT CHANNEL

Available to all professionals on AXIA's own staff, it is a confidential and free channel to obtain support on personal and professional matters, 24 hours a day and 7 days a week.

Phone: 0800 718 7815

Email: axia@cgpbrasil.com

WhatsApp: 11 4420-4050



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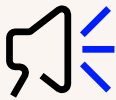
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6. COMBATING HARASSMENT AT AXIA

Services are provided by a multidisciplinary team, capable of guiding on the harassment situation faced through psychological and social guidance.

If psychological counseling is needed to think about viable solutions and develop an action plan for each situation or problem, up to 6 sessions per case/problem will be made available.

The service is external, governed by the General Data Protection Law, and, therefore, AXIA does not have access to individual consultations or information.



WHISTLEBLOWING CHANNEL

An external and independent channel, available 24 hours a day and 7 days a week, through which anyone can safely and anonymously report actions by professionals, suppliers and service providers that violate the Code of Conduct, the Compliance Program, another internal policy of AXIA or, furthermore, current legislation in Brazil.

AXIA guarantees protection to the whistleblower, including against any retaliation.

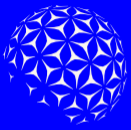
Phone: 0800 721 9885

Website: www.axia.com.br/canaldedenuncias

The whistleblowing report can be made by the harassed person or another person who has witnessed the inappropriate conduct.

The basis of the whistleblowing report is essential for an effective investigation.

- If possible, a detailed account should be provided, mentioning what happened, when and where the incident occurred, the names of the people involved, indicating possible witnesses, if any, and whether the incident is still occurring;
- If there is any evidence of what happened, the Whistleblowing Channel allows files such as images, photos, videos and audio recordings, among others, to be attached. It is also possible to indicate where such evidence can be found if it is not possible to attach it to the channel.



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GUIDE TO COMBATING SEXUAL AND MORAL HARASSMENT

6. COMBATING HARASSMENT AT AXIA

What can be used as evidence of the practice:



Photos;



Videos;



WhatsApp
messages;



Chat conversations;



Emails;



Security cameras;



Phone call records;



Record of dates and times
of incidents;

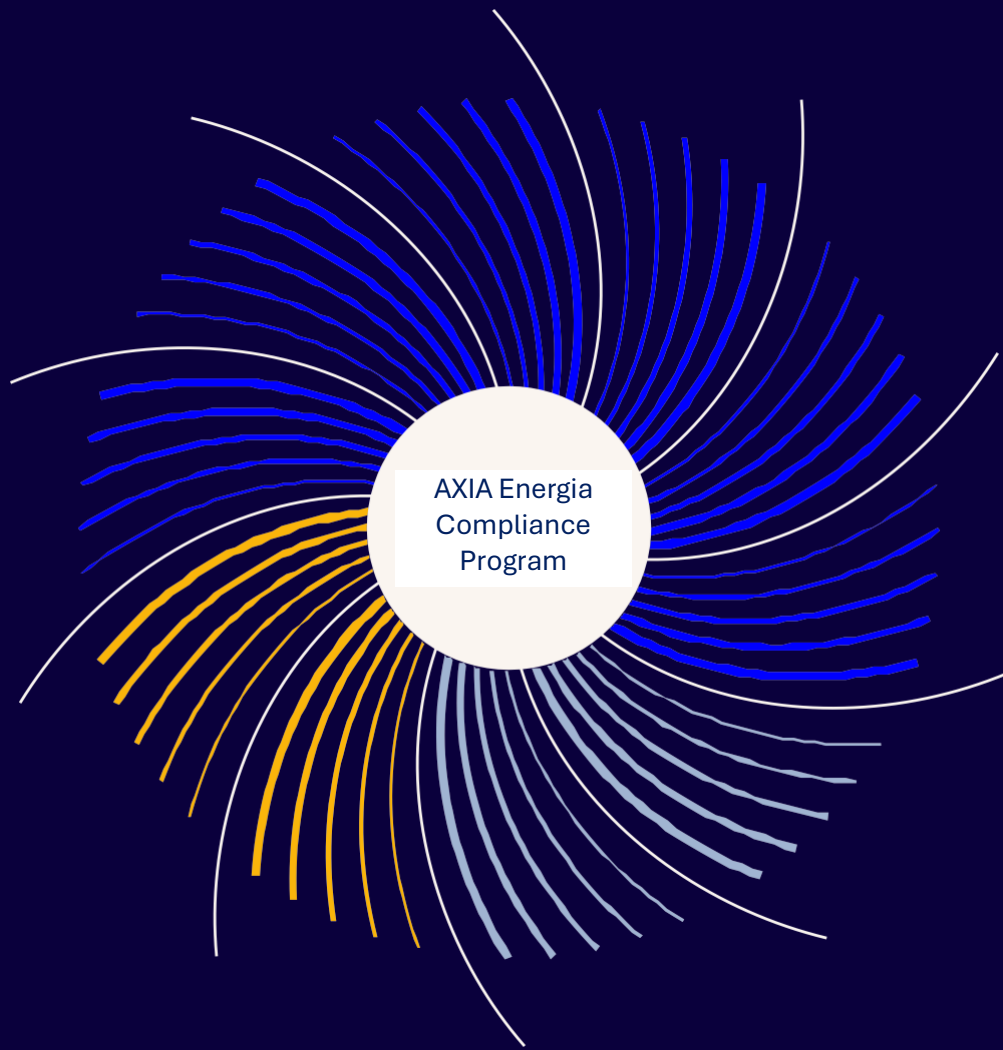


Information from corporate
systems;



Witnesses – person who has
observed or witnessed the
conduct of the harasser.

At the end of an internal investigation process, in cases that are upheld or partially upheld, the application of consequences is indicated, which include administrative or disciplinary measures, or the indication of remediation actions, such as the improvement of existing processes or regulations and the conduct of training, among other measures.



AXIA Energia
Compliance
Program

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