



Eletrobras

SPOKESPERSON POLICY FOR ELETROBRAS COMPANIES

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Spokesperson Policy for the Eletrobras companies

Area responsible for issuance

Communication Superintendency/Communication and Institutional Relations Department

Target Audience

Communication areas, Executive and Fiscal Board members, directors, managers and employees of the Eletrobras companies

Approval

Resolution 647/2020, dated 11/3/2020, of the Board of Directors of Eletrobras

Deliberation 190/2020, dated 11/26/2020, of the Executive Board of Eletrobras

Repository

All policies of Eletrobras companies are available on the website:

<https://eletrobras.com/en/Paginas/Bylaws-Policies-and-Manuals.aspx>

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Revision History

Version	Approval	Main changes
1.0	DEL-237/2018, 11/30/2018.	N/A
2.0	RES-647/2020, 11/3/2020. DEL-190/2020, 11/26/2020.	Redefinition of the Eletrobras companies' spokespersons and who shall appoint them in crisis situations.



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1 Purpose

Establishing guidelines for services provided by spokespersons at Eletrobras companies, aiming at ensuring a unified institutional discourse and strengthening the relationship with their stakeholders, based on a stance of enhancing corporate reputation, aligned with Eletrobras companies' ethical principles and values.

2 References

- 2.1. Federal Law No. 13.303, dated June 30th, 2016
- 2.2. Instruction CVM 358
- 2.3. Code of Ethics and Conduct for Eletrobras Companies
- 2.4. Policy for Communication and Engagement with Stakeholders of Eletrobras Companies
- 2.5. Policy for Disclosure and Use of Relevant Information of Eletrobras Companies
- 2.6. Eletrobras Business Strategic Plan
- 2.7. Eletrobras Business and Management Master Plan
- 2.8. Norms of consequences management of Eletrobras companies
- 2.9. Norms of crisis communication management of Eletrobras companies

3 Principles

- 3.1 Prompt and accurate communication
- 3.2 Provide training of spokespersons
- 3.3 Act with commitment and respect to the human being and the environment
- 3.4 Act in accordance with the law
- 3.5 Observe the principles of business efficiency and effectiveness
- 3.6 Comply with the Code of Ethics for Eletrobras Companies
- 3.7 Meet sustainability requirements
- 3.8 Observe the principle of transparency

4 Guidelines

4.1 General guidelines

The Eletrobras companies shall:

4.1.1 Define who are the Eletrobras companies' spokespersons, the assignment being a responsibility of their Board of Executive Directors, within the limits of their statutory powers, and which may formally assign this spokesperson duty to employees, specifying the limits of each spokesperson's functions.



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4.1.2 Assign spokespersons in crisis situations that may risks to the companies' results, image and reputation, according to norms of crisis communication management of Eletrobras companies, the assignment being a responsibility of the company's president or president-director.

4.1.3 Determine that workforce representatives are not authorized to speak on behalf of the Eletrobras companies when not formally assigned to this duty, being this an exclusive prerogative of the Eletrobras companies' Boards of Executive Directors.

4.1.4 Ensure that formally assigned spokespersons are not authorized to voice personal opinions when speaking on behalf of an Eletrobras company, according to the deliberation of the respective Board of Executive Directors.

4.2 Specific guidelines

The communication areas of the Eletrobras companies shall:

4.2.1 Support the Boards of Executive Directors of the Eletrobras companies in defining the priorities and key topics for the performance of spokespersons according to the strategic guidelines of Eletrobras companies, focusing on the stakeholders.

4.2.2 Support the Boards of Executive Directors of the Eletrobras companies in planning, monitoring, measuring and evaluating the performance of previously appointed spokespersons.

4.2.3 Ensure that appointed spokespersons have timely access to all internal and external information relating to issues they are authorized to speak of on behalf of the institution.

4.2.4 Ensure that all spokespersons have proper technical knowledge to exercise the function and have access to specific training to perform it.

4.2.5 Identify the most sensitive issues to which assigning spokespersons is recommended, and promote training of the professionals assigned to the duty, after designation by their respective Boards of Executive Directors.

4.2.6 Guide coordinately the performance of spokespersons, in partnership with managers of multiple areas of the Eletrobras companies, so as to ensure a unified corporate discourse, according to business goals.

4.2.7 Mediate spokespersons' communication flow with mass media vehicles.

4.2.8 Identify risks and opportunities of spokespersons' performance, evaluating potential impacts on public interest, including planning new initiatives, continuous enhancement and preparation of new spokespersons.

5 Responsibilities

5.1. Eletrobras Board of Directors - define the holding's spokespersons.

5.2. Eletrobras Board – approve this policy.



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- 5.3.** Eletrobras companies' Board of Directors - define the companies' spokespersons, provide the approval of this policy by their Boards, and sponsor its implementation in the companies.
- 5.4.** Eletrobras Companies' Boards – approve this policy and monitor its implementation.
- 5.5.** Eletrobras Superintendency of Communication – coordinate the preparation and implementation of this policy and propose eventual updates.
- 5.6.** Integrated Communication Committee of Eletrobras Companies – propose and follow up procedures that comply with this policy.
- 5.7.** Communication Superintendencies and/or Management of Eletrobras companies – act as supporters in the implementation and maintenance of this policy.
- 5.8.** Spokesperson – speak on behalf of the company, whenever authorized and required to do so. Stay up to date on the issue or issues which he/she will speak of, representing the institution, and participate in the training offered by the Communication areas at Eletrobras.

6 Concepts

6.1 Engagement

Activity performed to create an opportunity for dialogue between the organization and one or more of its stakeholders, in order to provide information base for the organization's decision-making processes.

6.2 Workforce

Permanent employees, service providers, trainees and other third-parties on a commitment basis and relationships other than those mentioned above.

6.3 Crisis Management

Preventive and/or corrective procedures and actions to be defined by top management of organizations, with the purpose of avoiding or minimizing the impact of corporate issues and risks.

6.4 Institutional image

Image that companies project and by which they are perceived by stakeholders, in a conscious or unconscious and emotional manner. These perceptions are subject to the form and content of internal and external communication actions.

6.5 Spokespersons

Professionals previously assigned to represent the company in internal and external events or in interviews with media vehicles, particularly important in times of crisis.

6.6 Stakeholder

Any organization or individual that may be affected by the company's activities, the actions of which may affect the company's ability to implement its strategies and achieve its objectives.



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6.7 Reputation

Important asset for corporate image management, built in the long term from the public's perception of the company.

6.8 Key topics

Strategic topics on which the key messages to be communicated to the various stakeholders of the organization, whether external or internal, are based.

6.9 Sensitive topics

Topics with potential for generating conflicts of interest from the point of view of business strategy, which may affect the relationship of trust between the company and its stakeholders.

7 General Provisions

- 7.1** This policy may be unfolded into other normative documents valid to all Eletrobras companies as well as specific document to each Eletrobras company, always aligned with the principles and guidelines set forth herein.
- 7.2** Regarding the Eletrobras companies' commitment the Brazilian federal government Pro-Equity Gender and Race Program, all the terms used in this policy, such as employees and other similar ones, referred to by male gender wording refer collectively to all the concerned groups of people.
- 7.3** The guidelines hereby established must be complied by all targeted persons; in case of non-compliance, they are subject to the norms of consequences management of Eletrobras companies.
- 7.4** All normative documents establishing guidelines contrary to those hereby established must be fully or partially revoked.