



Eletrobras

**POLICY FOR COMMUNICATION
AND ENGAGEMENT WITH
STAKEHOLDERS OF
ELETROBRAS COMPANIES**

Version 4.0
10/29/2020

Policy for Communication and Engagement with Stakeholders of Eletrobras companies

Area responsible for issuance

CEO/Communication Superintendency

Target Audience

All employees, managers, officers and directors of Eletrobras companies.

Approval

Resolution 100/2019, dated 5/28/2019, of the Board of Directors of Eletrobras

Repository

All policies of Eletrobras companies are available on the website:

<http://eletrobras.com/pt/Paginas/Estatuto-Politiclas-e-Manuais.aspx>

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Revision History

Version	Approval	Main changes
1.0	8/2009	N/A
2.0	2/9/2015	Compliance with the new policy model, inclusion of stakeholders engagement guidelines, title alterations
3.0	5/28/2019	Inclusion of specific stakeholders engagement guidelines, title alterations
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1 Purpose

Promoting integrated and interactive communication between Eletrobras companies and between those companies with their stakeholders, in a coordinated and synergistic manner, based on the guidelines of the Strategic Plan, the Code of Ethical Conduct and Integrity and other legal or non-legal directives, furthering and stimulating dialogue, accessibility and engagement with all stakeholders, with a view to creating and strengthening trustful relationships, taking responsibility for their actions, sharing values and acting as a promoter of ethical principles and practices in the pursuit of sustainable development in all their relationships.

1.1 Specific objectives

Disseminating the principles and values of the institution through the key topics of communication, based on the balance between the interests of the institution and the expectations of the stakeholders, mapped and prioritized by the strategic planning of Eletrobras companies, as follows:

- **Workforce/Relatives** – strengthening the sense of pride, belonging and integration, focusing on the role of the workforce as an agent of transformation and the generation of shared value.
- **Shareholders/Investors/Market Analysts** – broadly, simultaneously and regularly disclosing relevant results, acts and facts, as well as matters related to corporate governance, reinforcing the perception of transparency and accountability in relation to invested capital and the sustainability of the business.
- **Communities** – contributing to building a partnership relationship, highlighting the benefits of the regional integration of the company to local development, with respect to community interest and the sustainable use of natural resources.
- **Society** – strengthening the company's commitment to the country's development through the production of clean, efficient, safe, reliable, and socially responsible energy.
- **Press/Opinion leaders** – maintaining constant dialogue with local, national and international press, providing information in an impartial, transparent and effective manner, emphasizing respect for stakeholders.
- **Partners/Sponsors/Suppliers** – contributing to building and maintaining a partnership and development relationship with the partners, observing the legal provisions, creating interaction mechanisms that favor the smooth running of business for both parties, based on ethical precepts and corporate sustainability.
- **Governments/Representatives/Regulatory Agencies** – providing permanent information on the actions and achievements of the company, in accordance with general interests, seeking to anticipate legislative demands and legal and regulatory provisions, favoring the development of society.

- **Clients/Consumers/Suppliers** – strengthening the relationship of mutual trust in order to understand the demands and facilitate the development of solutions for a reliable, continuous and quality service that prioritizes energy efficiency and safety of the population.

2 References

- 2.1.** Sustainable Development Goals (SDG) of the United Nations Development Program (UNDP).
- 2.2.** The United Nations Global Compact (UN).
- 2.3.** The UN Guiding Principles on Business and Human Rights.
- 2.4.** Federal Law No. 13.146, dated July 6, 2015.
- 2.5.** Federal Law No. 13.303, dated June 30, 2016.
- 2.6.** Rules of the Special Secretariat of Social Communication (Secom), of the Presidency of the Republic.
- 2.7.** Strategic Planning of Eletrobras Companies.
- 2.8.** Code of Ethical Conduct and Integrity for Eletrobras Companies.
- 2.9.** Policy of Disclosure and Use of Relevant Information and Negotiation of the Eletrobras Companies Securities.

3 Principles

- 3.1** Promptness and accuracy.
- 3.2** Training, creativity and innovation.
- 3.3** Commitment and respect to the human being and the environment.
- 3.4** Legal compliance
- 3.5** Business efficiency and effectiveness
- 3.6** Equality and respect for diversity.
- 3.7** Ethics.
- 3.8** Sustainability.
- 3.9** Transparency.
- 3.10** Commitment to immediate report of ethical and integrity diversions.
- 3.11** Appreciation and motivation of the work teams.
- 3.12** Ethical and straightforward criteria and mechanisms in the relationship with third parts.

4 Guidelines

4.1 General Guidelines

4.1.1 Recording, through action plans, procedures and activities that will support the process of managing the engagement and communication of Eletrobras companies with their stakeholders.

4.1.2 Planning of the engagement and integrated communication activities, in partnership with the managers of the different areas at Eletrobras companies, in order to achieve the objectives of the business, also providing accountability, before all stakeholders, of the activities carried out by Eletrobras companies.

4.1.3 Improving the process of brand, image and reputation management of Eletrobras companies.

4.1.4 Identifying engagement and communication actions that can be developed jointly by Eletrobras companies, optimizing efforts and resources.

4.1.5 Guiding and monitoring, within the scope of Eletrobras companies, the communication actions involved in processes of a technical, cultural, sports and socio-environmental nature.

4.1.6 Establishing feedback mechanisms, providing communication channels that promote the exchange of information and enable measuring of the degree of satisfaction of the various stakeholders with Eletrobras companies, ensuring that the stakeholders have effective channels for communication, including by reacting to the incentives produced by the institution, becoming the leads in the engagement with Eletrobras companies.

4.1.7 Monitoring, controlling and evaluating the execution of activities by systematically measuring the expected and achieved results, based on performance indicators and results of communication at Eletrobras companies.

4.1.8 Sharing, with Eletrobras companies, the management practices of engagement and communication with stakeholders, in order to promote improvements and information exchange.

4.1.9 Consulting stakeholders to establish relevant topics that guide the management of engagement and communication actions of Eletrobras companies.

4.1.10 Identifying the risks of engagement, seeking to mitigate them and evaluate the potential impacts on stakeholders, including in the planning of new initiatives, ensuring that the lessons learned are incorporated into the activities of Eletrobras companies, avoiding the repetition of relationship management mistakes and carrying out effective crisis management if necessary.

4.2 Specific Guidelines

4.2.1 Managing engagement with stakeholders

4.2.1.1 Maintaining ongoing dialogue with stakeholders, consulting on their expectations regarding the undertakings and activities of Eletrobras companies.

4.2.1.2 Keeping all stakeholders informed about the activities and business of Eletrobras companies, with special attention paid on communicating the results of engagement to these stakeholders.

4.2.1.3 Defining methods of engagement with each stakeholder, taking into account their specific characteristics, in order to facilitate the relationship and ensure the effective exchange of information between the institution and its stakeholders.

4.2.1.4 Informing the channels for complaints, reporting and suggestions from all internal and external stakeholders engaged with the institution.

4.2.2 Communication management

4.2.2.1 Defining the priorities and key topics for communication according to the strategic guidelines of Eletrobras companies, focusing on the stakeholders.

4.2.2.2 Planning, monitoring, measuring and evaluating communication actions.

4.2.2.3 Promoting the integration of actions and the optimization of the resources of communication action plans between Eletrobras companies.

4.2.2.4 Coordinating the development and application of the brand, image and reputation management model of Eletrobras companies.

4.2.2.5 Identifying aspirations, needs and demands of stakeholders, always with a view of building a long-term relationship.

4.2.2.6 Identifying potential conflicts in advance by providing communication solutions to support their proper management.

4.2.2.7 Establishing that all communication between Eletrobras companies and their stakeholders be carried out, preferably, by digital means, avoiding wasted of paper.

4.2.2.8 Incorporating transversely accessibility concepts and principles in actions, projects and work processes to address communication demands in the relationship with stakeholders.

4.2.3 Content and media management

4.2.3.1 Proposing priority and relevant content for internal and external transmission.

4.2.3.2 Defining the media in which the content will be transmitted, according to the stakeholders, stimulating interaction and monitoring the degree of satisfaction with Relations channels.

4.2.3.3 Adapting and putting into context the contents and the manner in which they are retransmitted, according to the stakeholder and the media.

4.2.3.4 Facilitating handicapped people's access to Eletrobras companies' devices, systems and means of communication and information, eliminating technological and communication barriers, and promoting perception, operational capacity and comprehension of those means, thus assuring that all stakeholders groups have the same engagement capacity.

4.2.4 Internal communication

4.2.4.1 Establishing an interactive communication with the workforce, aiming to keep them informed, motivated and committed to the strategic objectives of the business.

4.2.4.2 Supporting the actions of the leaderships as core agents of communication, developing mechanisms that promote its multiplier power.

4.2.4.3 Proposing solutions for internal communication of sensitive topics in order to mitigate possible impacts of institutional action.

4.2.4.4 Encouraging the participation of the workforce in actions promoted and/or sponsored by Eletrobras companies.

4.2.4.5 Integrating the schedule of internal events, avoiding overlapping, redundancy or fragmentation of messages.

4.2.4.6 Establishing periodic internal communication on aspects of ethics and integrity, in order to promote an environment based on actions of this nature.

4.2.5 Relationship with the press

4.2.5.1 Developing, maintaining and expanding communication flows, facilitating the relationship between Eletrobras companies and the regional, national and international press.

4.2.5.2 Proposing actions for the proper positioning of Eletrobras companies in relation to sensitive issues.

4.2.5.3 Promoting the training of the spokespersons of Eletrobras companies as to the relationship with the press.

4.2.5.4 Considering, at all opportunities for interaction with the press, the principles set out in the Policy of Disclosure and Use of Relevant Information and Negotiation of the Eletrobras Companies Securities.

4.2.5.5 Proposing communication solutions for crisis management.

4.2.6 Corporate communication

4.2.6.1 Guiding the diffusion of values, conduct and procedures of Eletrobras companies in projects involving sponsorship, publicity, preservation and improvement of the quality of life of society from the ethical-cultural and socio-environmental point of view.

4.2.6.2 Developing advertising strategies to convey the message of Eletrobras companies, contributing to strengthen corporate positioning.

4.2.6.3 Creating visual communication solutions and corporate material to support the business relationship strategy.

4.2.6.4 Organizing, promoting, monitoring and evaluating internal and external events and promotional actions that may contribute to build up the reputation of Eletrobras companies, observing respect for the use of public space and ensuring accessibility to stakeholders.

4.2.6.5 Encouraging stakeholders to commit to sustainable development, seeking points of cooperation for social and environmental issues.

4.2.7 Communicating with the community

4.2.7.1 Proposing, in the initiatives of Eletrobras companies, means of interaction with the relevant communities, respecting their spaces and values.

4.2.7.2 Supporting operational areas in the relationship and dialogue with communities.

5 Responsibilities

5.1 Eletrobras Companies Employees – observing the principles and guidelines set out in this policy in all their activities, collaborating to strengthen the corporate culture and achieve the objectives of Eletrobras companies.

5.2 Eletrobras Companies Managers – observing the principles and guidelines set out in this policy in all their activities, encouraging employees under their management to acknowledge this policy.

5.3 Eletrobras Superintendency of Communication and Corporate Relations – coordinating the preparation and implementation of this policy and proposing possible updates.

5.4 Communication Areas of Eletrobras companies – implementing this policy and acting on its developments and on the permanent and systematic dissemination of its contents to stakeholders.

5.5 Integrated Communication Committee of Eletrobras Companies – proposing and following up procedures that comply with this policy.

5.6 Executive Board of Eletrobras Companies – approving this policy and ensuring its implementation, enforcing compliance with its principles and guidelines in all its decisions.

5.7 Board of Directors of Eletrobras Companies – approving this policy and issuing strategic guidelines for Communication within Eletrobras companies.

6 Concepts

6.1 Accessibility

Possibility and condition of access to make use, with safety and autonomy, of spaces, furniture, urban equipment, buildings, transportation, information and communication, including their systems and technologies, as well as other services and installations open to the public, of either private or collective use, both in urban and rural areas, by people with disabilities or reduced mobility.

6.2 Communities

Those with which the company interacts and/or coexists based on its business portfolio or the projects developed that aim at improving the quality of life of the population.

6.3 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 (Source: ISO 26000).

6.4 Workforce

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

6.5 Brand management

A set of strategies developed by the organization to create a value relationship between the brand and the people, aligning the brand strategy with the business strategy, understanding the values necessary for the sustainability of the business and defining its personality and the attributes to be associated by the market, as well as the guidelines for consistent communication.

6.6 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.

6.7 Corporate image

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

6.8 Spokespersons

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

6.9 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. (Source: AA 1000).

6.10 Reputation

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

6.11 Key communication topics

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

6.12 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. The relationship management with the different stakeholders of Eletrobras companies is shared responsibility of all the managers of the institution, and is specially guided by the Strategy and Business Management and Sustainability and Communication areas.

7.2. The communication of Eletrobras companies consists of processes, the lines of action of which are listed in the item Specific Guidelines of this policy and refer to the workflow, having no relation with the functional structures of each of the companies.

7.3. This policy may be unfolded into unified rulings valid for all Eletrobras companies, as well as into normative documents specific to each Eletrobras company, always aligned with the principles and guidelines hereby established.