

CODE OF ETHICS AND CONDUCT

São Paulo/SP
October, 2020



ENERGIA

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A MESSAGE FROM THE PRESIDENT

People are the ultimate reason for everything we do, and we strive to serve them well. Our family, our co-workers, our business partners and friends: each of these groups is a small universe in itself, with its own struggles and achievements. Beyond these groups closer to us, we are all part of a larger community made up of many other unique individuals with whom we share universal values such as the pursuit of a dignified life.

That is where Ethics comes into play: it guides our actions so we can work towards our objectives without harming other people, and also helps other people to advance towards their own goals with dignity. This NEWCOM Code of Ethics and Business Conduct is addressed to all our stakeholders - employees, partners, customers and business partners, service providers, government authorities and society at large. In it we outline our commitment regarding the way we carry out our activities and deal with people and the environment, as well as desired and unacceptable stakeholder behaviors.

We believe that following this Code of Ethics and Conduct will lead to actions that are respectful of others and of the environment, enabling us to work together towards a more equitable and prosperous society.

In short, understanding and complying with this Code of Ethics and Conduct is an essential requirement for any business activity we engage in, and a non-negotiable condition to be followed by all our stakeholders.

I hope you enjoy reading this important information!



ENERGIA

1. INTRODUCTION

Our values guide our daily business activities and have a direct impact on the quality of our relationship with our internal and external customers. We aim to work in an environment that is respectful and transparent, forging beneficial relationships with the parties involved in our business activities. As part of this commitment, we seek constant improvement and excellence in our performance before all stakeholders: employees, customers, suppliers and society in general. This document is part of this effort, and it is based on NEWCOM pillars:



COMMITMENT AND TRANSPARENCY

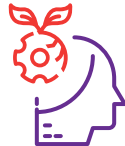
are essential in our business activities, and that is why we place **Risk Management** first in our decisions. We keep track of recent developments; we are up-to-date and focused on understanding, measuring and controlling the risks we take, and we follow and respect established procedures and limits.



CREATING VALUE for all stakeholders is our ultimate goal, and in order to achieve it we pursue **Analytical Excellence**: our analytical activities contribute to shaping a fair, balanced energy market. We believe that good opportunities are created from deep knowledge of market dynamics combined with courage and creativity to adopt different business approaches.



We build Relationships Based on Trust. It takes solid partnerships to achieve ambitious goals, so we deliver as promised and are fully committed to excellence in all stakeholder relationships.



Sustainability and Innovation are important goals for people and companies. We encourage our employees to show their **Proactivity**, anticipating changes and proposing creative, innovative solutions. This is how we create competitive advantage for our company and add value for our business partners and other stakeholders.

This CODE OF BUSINESS CONDUCT AND ETHICS was created to guide all our activities, and is therefore binding for all those who have any business relationship with NEWCOM.



2. WHY HAVE A CODE OF ETHICS AND BUSINESS CONDUCT?



A company is a living organism made up of people -- it thrives on the energy and synergy generated by its interactions with internal or external customers. We build our company reputation daily as we engage in our internal and external relationships. Our integrity in doing business is a fundamental component of our corporate image -- more than that, it is part of our essence.

With this in mind and also aiming to foster our reliability, safety and sustainability, NEWCOM developed and implemented this Code of Ethics and Business Conduct ("Code of Ethics and Conduct") as a tool to integrate ethics and embed our core values in the daily activities performed by the employees who give life to our organization.

Our Code of Ethics and Conduct should guide our decision-making processes and support our corporate commitments. All parties involved in any relationship with NEWCOM must understand and follow the standards of behavior established in this Code of Ethics and Conduct.

“ This Code of Ethics and Conduct cannot cover or predict every possible situation we encounter daily, yet it can be useful in setting accepted parameters and limits.

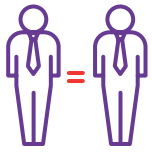
If you have any questions on the content you see here, please reach out to your commercial contact person or leader, or write to us using our confidential channels: 0800 882 0607 or <http://canaldeetica.com.br/newcom>.



This Code of Ethics and Conduct cannot cover or predict every possible situation we encounter daily, yet it can be useful in setting accepted parameters and limits. NEWCOM is confident that this resource will strengthen our culture and enhance our internal and external relations with different audiences, helping us shape a cooperative, respectful and productive work environment where our actions are guided by ethics, consistency and justice, as well as by the highest quality standards.



3. WHO SHOULD FOLLOW THIS CODE?



The guidelines contained in this Code of Ethics and Conduct apply to all NEWCOM partners and employees, our external customers, suppliers, and any service providers who may perform work within or outside the organization's facilities, as well as partners in general.

Under this Code of Ethics and Conduct, **all stakeholders** are seen within same general context, and are therefore **equally responsible for complying with the Code**, in addition to following other existing NEWCOM policies and standards.

4. DISSEMINATION

The following teams and individuals are responsible for communicating and disseminating this Code of Ethics and Conduct:

1. The People Management team (*Gente e Gestão*) is responsible for making new hires aware of the Code before they start working at NEWCOM, providing information on where to find it in www.newcomenergia.com.br and underscoring the obligation to comply with this Code of Ethics and Conduct and report any suspect activities through our confidential channel.
2. Leaders must get their teams to commit to the Code of Ethics, disseminating key guidelines and reminding them to always uphold the beneficial practices and ethical behaviors described here while they make every effort to achieve significant results for the company.
3. All executives and employees are expected to work as described in this material, and they are also responsible for enforcing these rules and policies when working with third parties, making strict compliance a requirement for all.
4. Working together, the People Management and Communications teams must promote training activities whenever necessary to ensure full compliance with the principles that guide this Code of Ethics and Conduct.



This Code of Ethics and Conduct must always be available and updated at, to be used for consultation and reference on the topics addressed here.

5. TOPICS

5.1 ÉTICA PROFISSIONAL

Every individual bound by this Code of Ethics and Conduct must act professionally and ethically, respecting others, preserving the environment and obeying the laws in force in Brazil.

NEWCOM believes everyone has the right to fair and courteous treatment in interaction among leaders, subordinates and colleagues, or in relations between the organization and the external stakeholders or public in general.

In any and all activities, we must ensure excellence and accuracy in the information we provide, never accepting the use of untrue facts or questionable sources.



“ NEWCOM will not tolerate any direct or indirect offer, request or acceptance of any form of bribe, kickback or improper advantage by its employees, partner companies, customers or any other relations.

5.2 COMPLIANCE WITH BRAZILIAN POLICIES, REGULATIONS AND ALL ANTI-CORRUPTION LAWS

This Code of Ethics further requires knowledge of and compliance with all NEWCOM corporate policies, as well as with relevant Brazilian legislation, especially but not limited to the laws and regulations applicable to our business activities, as well as any laws or guidelines aimed at preserving ethical, moral and social values.

NEWCOM will not tolerate any direct or indirect offer, request or acceptance of any form of bribe, kickback or improper advantage by its employees, partner companies, customers or any other relations.

All those bound by this Code of Ethics and Conduct undertake not to offer, promise or make payments or give benefits, bonuses or anything of value to a national or foreign public official. A public official is defined as:



- a.** any political agent, public servant and public employee belonging to the direct and indirect public administration of any of the Powers of the Union, States, Federal District, Municipalities, Territory, public company or any other company funded by the Treasury in more than 50% of its capital or annual revenue;
- b.** any person who, even temporarily or without remuneration, holds a position, job or public function in state bodies,



entities or diplomatic representations of a foreign country, as well as in legal entities directly or indirectly controlled by the public authority of a foreign country, or in international public organizations.

In addition, those bound by this Code of Ethics and Conduct undertake to comply with related laws such as anti-corruption, anti-bribery, money laundering, antitrust or conflict of interest; they will not fund, finance, sponsor or in any way subsidize the practice of illegal acts, nor will they seek to frustrate, defraud, obtain or retain an undue advantage or benefit as a result of a public award or bid and/or public contracts or agreements.

They further undertake to promptly report to their leader or internal contact person at NEWCOM any and all situations that may constitute a violation and/or suspected violation of the rules established herein, especially in relation to situations that violate any Anti-Corruption Laws.

“ We will recognize employee contributions and make decisions on career advancement based on professional qualifications, excellence in the work performed and results obtained. No discriminatory criteria will be tolerated in assessments.

5.3 DISCRIMINATION



Respect for others is part of our corporate commitments. Discrimination based on nationality, race, belief, gender, condition and social position or disabilities and special needs is not acceptable at Newcom. We will recognize employee contributions and make decisions on career advancement based on professional qualifications, excellence in the work performed and results obtained. No discriminatory criteria will be tolerated in assessments.

Any activities carried out by Newcom, its shareholders and employees involving partner companies, customers and other social networks must be based on technical and commercial criteria; they must aim for inclusion and be consistent with company values. Decision-making can never be influenced by prejudice or discrimination.

NEWCOM supports and abides by all anti-discrimination laws.

5.4 MORAL AND SEXUAL HARASSMENT

NEWCOM will not accept any action that may expose employees or any other person to humiliating, ridiculous or embarrassing situations, as well as any acts characterizing sexual or moral harassment. There will be no tolerance for any form of abusive behavior, whether verbal or gestural, between NEWCOM staff members or involving third parties.



Any action possibly constituting a form of moral or sexual harassment must be immediately reported through the confidential channels, anonymously if so desired, and the Ethics and Conduct Committee will investigate all reports submitted.

Please report any harassment through our confidential channels: 0800 882 0607 or <http://canaldeetica.com.br/newcom>.

5.5 PRIVILEGED AND/OR CONFIDENTIAL INFORMATION

Any type of privileged, important or confidential information obtained while executing one's activities must not be released, published, passed on to third parties or openly disclosed in any means of internal or external communication without clear and explicit authorization from the person responsible for such information. In addition, we should never seek to obtain information from other organizations by illegal means.

This document does not replace the Term of Commitment, Secrecy and Confidentiality signed between NEWCOM and other parties, but rather complements it. All electronic files and printed documents and copies must be stored in secure locations, and only shared with those who should in fact have access to them.

Any and all information, including employee personal data, business and/or financial information on customers or suppliers, among others, must be used only for its original purposes. All those

bound by this Code of Ethics and Conduct undertake to use information only for legitimate purposes and never for other unauthorized intentions or as a way to obtain advantages of any nature.



Those bound by this Code of Ethics and Conduct have the legal obligation to protect and safeguard all information to which they have access, especially, but not limited to, non-public information relating to NEWCOM's business. This obligation remains in place even after termination of their employment or their commercial/institutional relationship.

5.6 INTELLECTUAL PROPERTY RIGHTS

The product of intellectual work developed or created by any employee during the exercise of their professional activities is the exclusive property of NEWCOM, even after termination of employment or contractual relationship.



5.7 CONFLICT OF INTEREST

NEWCOM's interests must always be placed first in relation to personal interests. Bear in mind the good practices related to our activities, and if a situation seems unclear or a topic does not seem to be covered in the Code, use your common sense. If you are unsure, reach out to your leader or a member of the Ethics and Conduct Committee. Remember it is up to each one of us to create a healthy environment, free of any conflicts of interest.



It is strictly forbidden to do any business, enter any deal or make any decision that might constitute a conflict of interest with NEWCOM. The Ethics and Conduct Committee should be consulted whenever individual objectives and interests might influence corporate actions or decisions and lead to actions that may go against NEWCOM's values and interests. Private activities that use material resources belonging to the organization or might clash with the professional responsibilities of executives or employees and thus affect their performance are to be avoided at all costs: failure to comply with this rule may lead to a formal warning or to other appropriate measures to safeguard NEWCOM's rights.

Any partner or employee with having direct or indirect participation in a business that may conflict with NEWCOM's interests must communicate such fact to the Ethics and Conduct Committee.

Some examples of situations that may generate a conflict of interest:

- a. Holding shares in a supplier
- b. Holding shares in direct or indirect competitors
- c. Providing services of any kind to competitors
- d. Having a spouse who fits the situations above.

5.8 EXTERNAL RELATIONS

No information about NEWCOM should be disclosed to any other competitor unless this has been expressly approved by the Communication area and/or by the Managing Partners, and except in cases where NEWCOM is being quoted as an opinion maker on a given topic.

Newcom places fair and ethical competition above all. We will not manipulate prices, abuse a dominant position in the market, enter sales agreements that harm healthy competition or engage in any practices that do not comply with current legislation.

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Employees are not allowed to speak well or badly of competitors in an attempt to benefit a particular company or product. We expect our employees to carefully follow these guidelines when relating to external stakeholders.

5.9 RELATIONS WITH SUPPLIERS AND SERVICE PROVIDERS

Suppliers and service providers must be chosen based exclusively on technical, ethical and professional criteria. No personal



proximity, pressure or possible advantages should influence such choices.

If the contract with the supplier and/or service provider involves interactions with public officials or entities, selection criteria must strictly observe the precautions and legal requirements that are specific to this type of contract.

Every NEWCOM supplier or service provider is responsible for complying with the provisions established in this Code of Ethics and Conduct, and their contact person at NEWCOM is responsible for communicating the Code and enforcing its application.

No one is authorized to use their level of authority or position to demand financial benefits, goods, entertainment or any other type of advantages from suppliers, customers or subordinates, since this clearly infringes this Code.

5.10 GIFTS

Any relationship among those bound by this Code of Ethics and Conduct must be guided by ethics and integrity.

Situations that might be suggestive of an act of corruption must be avoided or dismissed, and no amount can be paid or received unless it is clearly defined in formal contracts and agreements with the corresponding organization.



NEWCOM employees may accept gifts from third parties as long as they are not valued at more than half the current minimum wage, which means in practical terms that only promotional gifts or free samples are allowed.

Gifts from a supplier or another NEWCOM commercial partner must be promotional and feature the logo of the supplier or party involved. Occasional meals may be accepted, provided they are used to discuss matters of the Organization. Gifts received outside what is acceptable under this Code of Ethics and Conduct must be

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communicated to your immediate leader and returned to the sender. In cases where this is not possible, you should send them to the People Management department, so that the items can be donated or serve as prizes in a draw or some other NEWCOM action.

NEWCOM must abide by the same rules described above when sending gifts to customers, suppliers or other companies.

Specific legislation must be observed when gifting involves public companies.

5.11 BRIBERY



Without prejudice to item 5.2 of this Code of Conduct, no NEW-COM partner or employee is authorized to offer or receive financial benefits, gifts or any type of personal or professional favor in exchange for confidential information, information about ongoing bids, defense of unethical interests or any other type of unethical exchange breaching our corporate values and commitments.

“ The employee is responsible for informing the People Management department of the existing kinship or emotional relationship with an employee or job candidate

5.12 RELATIONSHIPS, RELATIVES AND FAMILIES

Relatives of any degree may be hired as long as they are not subordinated to or managers of their relative in the organization, and provided they report to a different Director and/or Manager. All cases require prior knowledge and agreement by the respective Directors.

Affective relationships such as dating or engagement between employees must obey the same principle above.

The employee is responsible for informing the People Management department of the existing kinship or emotional relationship with an employee or job candidate. Failure to do so may lead to formal warning or even termination of employment or other applicable measures for noncompliance with this Code of Ethics and Conduct.

5.13 FRAUD

NEWCOM will only publish true financial information that is supported by a structure of internal controls which are periodically reviewed and audited. Every employee at NEWCOM must ensure that such controls are respected and disseminated throughout the Organization.

For the purposes of this Code of Ethics and Conduct and other applicable uses, fraud refers to any document that has been falsified or erased; to records of income or expenses booked earlier or later than due in order to meet targets; budgets and balance sheets lacking appropriate and valid supporting documentation; accounting records that do not reflect actual facts, etc.

We must all constantly seek opportunities for improvement in our organizational processes, and ways to enhance our reliability, security and maturity.



5.14 RESPONSABILIDADE SOCIAL E MEIO AMBIENTE

NEWCOM is an ethical, honest organization. We value sustainability and are aware of the needs of the society around us, and we will not promote or support any practice that can harm moral and ethical values.

Our employees are encouraged to participate in social activities, and the organization will facilitate access to cultural, artistic, educational and scientific events, sports and volunteer work, among other activities, whenever this is possible and relevant.



NEWCOM strives to minimize waste as part of our effort to reduce the environmental impact of our offices. In cities where selective waste collection is available, we separate recyclable items, and we expect our employees to cooperate and contribute to this practice.

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5.15 USE OF MATERIAL AND FINANCIAL RESOURCES

Financial or material resources provided by the organization must be used rationally and effectively by employees in their efforts to meet company objectives.

Material goods, such as corporate computers and cell phones, among others, must be used responsibly, primarily for professional purposes and never in a way that conflicts with NEWCOM's objectives or with the provisions in this document.

This Code of Ethics and Conduct establishes that each employee is responsible for ensuring the resources made available to him/her are only used as intended and never for illegitimate purposes, as shown in the examples below: (i) corporate access to the internet, corporate e-mail and/or computers can never be used for illegal, unethical or inappropriate activities such as gambling, pornography, piracy, copyright infringement or intellectual property, nor be used for external business unrelated to NEWCOM, or for criminal activities, etc.; (ii) work tools, corporate e-mail, brands or symbols should never be used to obtain personal advantages, financial or otherwise; (iii) internal reports must never be used for personal profit or to obtain undue advantage, etc.

Every employee is responsible for preserving and conserving NEWCOM assets such as furniture, equipment, etc. In case of misuse or neglect, the employee can be held responsible for reimbursing the company for damages caused.

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5.16 USE OF SOCIAL MEDIA

NEWCOM encourages proper use and participation in social networks, as long as it is consistent, judicious and marked by the common sense we expect from our employees.



At the same time, we underscore the need to respect our policies and commit to only releasing or posting verified information from a reliable source, and never disclose or pass on any type of company information, whether strategic or not, without prior consent by the company.

Thus, replicating news released by the organization to the press is allowed, observing the rules above. No profiles or communities should be created for NEWCOM on any social network without prior authorization granted by the Communications area.



Using the company name and logo as well the names of corporate products, programs, projects and images of the organization is not allowed. When the creation of the profile or community is authorized, this profile or community must be managed by the Communications area together with the Organization's Spokesperson and never by any individual employee. Posts on social networks featuring any type of company content, including images of NEWCOM events and employees (videos or photos, for example), must be guided by common sense and responsibility, and any questions about sharing information should be cleared with Communications.

Only the Communications area together with the Organization's Spokesperson may respond to comments, provocations, criticism or any posts related to NEWCOM made in discussion forums, blogs or micro blogs. Partners and employees should immediately report any such posts they come across to the Communications team, so they can discuss the matter with the Spokesperson and decide together on the action to be taken.

“ Internal communications containing company information, especially strategic information or documents marked as confidential, should never be forwarded or disclosed to anyone who is not a NEWCOM employee, except when you are expressly authorized or requested to do so by the area issuing the communication.

Any online exchange of company information or online sharing of files such as documents, electronic presentations, spreadsheets, etc., must ensure privacy, that is, access must be password-protected.



Internal communications containing company information, especially strategic information or documents marked as confidential, should never be forwarded or disclosed to anyone who is not a NEWCOM employee, except when you are expressly authorized or requested to do so by the area issuing the communication.

Likewise, announcements should never be posted on any external communication channel, community or social network on the internet.

5.17 MONITORING THIS CODE



First and foremost, the responsibility for monitoring and enforcing this Code of Ethics and Conduct falls on the members of the Ethics and Conduct Committee, the People Management and Communications areas. Under the terms of this Code, all NEWCOM partners and employees must also ensure its compliance and report practices that are not compatible with the organization's corporate values and commitments.

5.18 REPORTING ACTIONS THAT ARE INCOMPATIBLE WITH THIS CODE

NEWCOM partners and employees must report any practice that seems incompatible with the guidelines of this Code, as well as any other suspected unethical or unprofessional action.

This report can be made anonymously through the following channels: 0800 882 0607 or <http://canaldeetica.com.br/newcom>.

All reports will be sent directly to the Ethics and Conduct Committee, which will carry out a confidential investigation in order to assess the facts and make appropriate decisions.

Any decision in this regard can only be made on the basis of clear evidence that the report is true. In case of doubt, we advise you to reach out to your immediate supervisor or to a member of the Ethics and Conduct Committee.

Employees can also send an email to <http://canaldeetica.com.br/newcom>.

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6. CONSEQUENCES OF NON-COM- PLIANCE WITH THIS CODE

This Code of Ethics and Conduct is a tool to integrate and enforce NEWCOM corporate values and commitments in our daily business activities, in that it states what we expect from anyone we employ or with whom we have commercial or institutional relations.

Failure to adhere to any guideline in this Code of Ethics and Conduct will be carefully analyzed by the Ethics and Conduct Committee for the application of disciplinary sanctions provided by law or by this Code. Such sanctions may vary from verbal warning to termination of employment for employees and range from notifications to termination of contracts for suppliers, customers and other partner companies, without prejudice to the collection of losses and damages possibly caused to NEWCOM's image, reputation or name.



7. CORPORATE RELATIONS AT NEWCOM

7.1 DESIRED BEHAVIORS

You are expected to:

- i.** Know, practice and disseminate the NEWCOM standards and procedures set out in this Code.
- ii.** Strengthen institutional relations by maintaining working relationships based on respect, integrity, responsibility, transparency and assertiveness.
- iii.** Live NEWCOM values at work with a sense of ownership, building and strengthening internal and external relations, aiming for excellence in delivery and sustainable growth.
- iv.** Protect NEWCOM's image, preserving our reputation in the energy market and before any third parties.
- v.** Respect the intellectual property belonging to NEWCOM and third parties.
- vi.** Maintain the confidentiality of information from NEWCOM and customers obtained in the course of your work, unless forced to disclose facts as a result of a decision issued by a competent court or authority.
- vii.** Protect and preserve all NEWCOM assets against improper use, using them carefully and responsibly.
- viii.** Avoid situations in which your personal interests conflict with NEWCOM interests.
- ix.** Refuse gifts or favors of any kind that conflict with NEWCOM values and good business relationship practices.
- x.** Contribute to the enforcement of the principles in this code by reporting any irregularities.
- xi.** Observe and comply with all Policies established by NEWCOM.

7.2 UNACCEPTABLE BEHAVIOR

- i.** Failing to comply with the NEWCOM rules and procedures set out in this Code.
- ii.** Promising, offering or receiving any kind of bribe.
- iii.** Obtaining any type of personal advantage arising from your activity or position at NEWCOM.
- iv.** Discriminating or harassing other employees or suppliers and/or customers in any way.
- v.** Failing to comply with Work Safety obligations.
- vi.** Disrespecting Information Security rules and thus causing damage to NEWCOM or third parties.
- vii.** Working under the influence of illegal drugs or alcohol.
- viii.** Showing up for work in a manner that is inappropriate for your activities.
- ix.** Failing to protect NEWCOM's assets and image.
- x.** Having other professional activities that create a conflict of interest with NEWCOM business, during working hours or on your own time.
- xi.** Participating in external activities unrelated to your activities at NEWCOM during working hours.
- xii.** Failing to maintain the confidentiality of the information to which you have access in the course of your professional activities at NEWCOM.
- xiii.** Making public statements on behalf of NEWCOM without being officially designated to do so, or using the group's brand improperly.