

Sustainable Development Policy

Updated June 18, 2026

NEOENERGIA S.A.'s (the "**Company**") Board of Directors has the power to prepare, evaluate and consistently review the Company's Governance and Sustainability System, as well as approve and update policies that contain guidelines governing the Company's performance. It may also, as applicable, provide notice of the policies that it autonomously decides to approve at companies that are part of the group in which the Company is the controlling entity under applicable law (the "**Subsidiaries**" and "**Neoenergia Group**").

In the exercise of these powers and within the scope of existing legislation, the Company's Articles of *Incorporation* and the Iberdrola Group's *Corporate Purpose and Values* ("**Corporate Purpose and Values**"), as well as its sustainable development strategy, the Board of Directors hereby approves this Sustainable Development Policy (the "**Policy**"). This Policy will respect, develop and adapt the *Iberdrola Group's Core Ethical Principles of Governance and Sustainability* ("**Core Ethical Principles of Governance and Sustainability**") and the "**Group**", respectively).

1. Scope

This Policy shall apply to the Company. Nevertheless, it includes principles that complement the contents of *Core Ethical Principles of Governance and Sustainability* within the scope of corporate governance. To this extent, the principles of this *Policy* inform the specific actions and regulations of the Subsidiaries while observing their powers and autonomy in this matter.

These principles must also guide, when applicable, the performance of the Neoenergia Institute, which is linked to the Group.

The Company must align the at the companies in which it holds an ownership interest but are not part of the Group, as well as *joint ventures*, temporary associations and other entities it manages, with the Sustainable Development Strategy and the principles contained in this *Policy*.

2. Purpose

The purpose of this Policy is to establish general principles and foundations that govern the sustainable development strategy within the scope of the Company's activities as a Group subholding company in Brazil. It aims to foster a commitment to generating value sustainably for shareholders and other Stakeholders through the corporate and business activities of the Subsidiaries, taking into account their business activities and institutional context while providing an equitable return on collective actions that contribute to the

success of their respective business projects. This Policy promotes the values of sustainability, integration and dynamism.

The principles and bases compiled in this Policy are developed and materialized for the Company while considering their impacts on its Stakeholders. They are reflected in a specific policy that integrates the Company's Governance and Sustainability System and meets Stakeholders' specific needs and expectations.

3. Sustainable Development Strategy

Compliance with corporate interests, as defined in the Company's *Bylaws*, requires orientation towards the creation of integral and sustainable value (economic, environmental, social and governance) through the development of the activities included in its corporate purpose.

In compliance with its statutory mandate, the Company's Board of Directors developed this strategy aimed at creating value in a sustainable manner through the provision of quality services and the use of energy from renewable sources, which respects the environment and is attentive to the opportunities offered by the knowledge economy. These actions promote the supply of affordable, efficient, competitive and non-polluting energy that boosts environmental performance.

The Company therefore contributes to effective and global electrification through the development of sustainable energy from renewable sources. It works in collaboration with Neoenergia's personnel, communities, the supply chain and customers, in line with the provisions of its Governance and Sustainability System and, specifically, its *Human Rights Policy* and due diligence systems related to such matters.

For the above purposes, the Company seeks to innovate, obtain new investments and drive more efficient, sustainable and clean technologies while fostering growth and developing the talent and technical and human capacities of its employees, who strive to ensure personal safety and a secure energy supply and to build a successful business project together with all participants in its value chain. The Company's employees share such achievements with its Stakeholders.

3.1. Objectives of the Sustainable Development Strategy

The Company's Sustainable Development Strategy ensures, in particular, that the following objectives are achieved:

- a) Drive the fulfillment of purpose: *continue to build, every day and through collaboration, a healthier and more accessible energy model*, and promote the Group's three corporate values (sustainable energy, integrating and driving forces).

- b) Promote the participation of Stakeholders in the Company's business project through the generated social value.
- c) Favor the achievement of strategic objectives within the Group, in order to offer a safe, reliable, quality energy supply that respects the environment.
- d) Improve competitiveness at the Group level through the use of management practices based on innovation.
- e) Encourage information and communication in the different communities where the Company and the Subsidiaries operate while taking the specific characteristics of the various groups present into account so that the company is recognized as suitable for developing professional relationships marked by a sense of belonging, equal opportunities and freedom from discrimination, productivity, profitability, efficiency and sustainability.
- f) Manage risks and opportunities responsibly, maximizing the positive impacts of its activities in the different territories in which the Company and its Subsidiaries operate. At the same time, negative impacts must be avoided and minimized, as much as possible, by moving away from short-term approaches or approaches that do not adequately consider the interests of their respective Stakeholders, in addition to implementing remediation measures.
- g) Foster a culture of ethical behavior and increase business transparency in order to generate credibility and trust among respective Stakeholders and in the various communities in which the Company and its Subsidiaries carry out their activities.
- h) Promote relationships of trust with Stakeholders and respond in a balanced and integrated manner to all parties while paying special attention to local communities in order to gather their perspectives and expectations on potentially relevant issues and take them into account. The Company must also understand and manage the impacts of its activities and those of its Subsidiaries on their respective Stakeholders.
- i) Contribute to the recognition received by the Company and its Subsidiaries and improve their reputation.

3.2. Implementation and monitoring of the Sustainable Development Strategy at Neoenergia Group

The companies that make up the Neoenergia Group are responsible for implementing and supervising a sustainable development strategy within the Group in accordance with the

corporate and governance structure defined under the *Bases for the definition and coordination at the Iberdrola Group* and the respective bylaws.

This strategy is implemented through the Group's sustainability departments and, when applicable, by different committees specialized in sustainable development and reputation in accordance with the principles of subsidiarity and decentralized management. These include, specifically:

- a) Iberdrola, S.A.'s Sustainability and Reputation Committee (or the committee that, at any time, comes to assume its powers), has the authority to propose, based on the *Core Ethical Principles of Governance and Sustainability*, the basic actions to be taken in terms of sustainability and reputation enhancement at the Group level and, among other matters, approve and monitor development plans in both areas, monitor the most relevant advances in these areas, and collaborate in the preparation of public information on such matters disclosed by the Company.
- b) The Company's Sustainability and Reputation Committee aims to: (i) promote the monitoring of the policies, strategies and guidelines that are approved or adopted, as appropriate, by the Subsidiaries; (ii) strengthen the supervision, coordination and organization of the corporate sustainable development strategy in Brazil; and (iii) notify Iberdrola, S.A.'s Sustainability and Reputation Committee (or the committee that, at any time, comes to assume its powers), of the results achieved.

4. Social value

Through the social value generated by its activities, the Company contributes through tax payments and encourages the development of its social objectives for the benefit of its Stakeholders in accordance with the principles established in the standards and policies that integrate the various chapters of its Governance and Sustainability System. These initiatives help promote social development, both from an economic point of view and from different perspectives: business ethics, promotion of equal opportunities, respect for human rights, protection of vulnerable groups, promotion of innovation and efficiency, care and protection of nature, universal access to energy supply and water, climate action and generation of quality employment based on merit and equal opportunities, the attraction of talent and sense of belonging, among other measures centering on wellbeing. These initiatives favor a more resilient economic system based on safe, competitive and clean renewable energy of local origin.

Neoenergia Group companies generate social value through the development of their business activities, which represent the main source of value generation for their Stakeholders. This process prioritizes cleaner, more autonomous and safer energy, in addition to promoting measures aimed at protecting vulnerable groups. These initiatives are carried out through collaborations, sponsorships and specific actions within the social sphere conducted directly or in collaboration with the Neoenergia Institute, which is linked

to the Neoenergia Group. These initiatives are aligned with the Group's institutional strategy, which is committed to maintaining business ethics in the face of its Stakeholders and favoring their involvement and the design and periodic execution of awareness-raising initiatives on different issues that promote sustainable development.

The measurement of social value must include the main positive impacts of current and future activities at Group companies—whether direct, indirect or induced. Activities must be consistent with their link to the creation of long-term shared sustainable value for shareholders while also considering other Stakeholders.

Due to the different objectives and goals for sustainable development, Neoenergia Group companies use a wide-ranging series of indicators that allow them to evaluate their contribution from different perspectives. Although, due to the intangible nature of many of their activities, indicators do not capture the full extent of the impacts generated, the results obtained are an effective tool for evaluating the fulfillment of established commitments to social value.

This assessment is considered by the Neoenergia Group's Board of Directors when defining the Group's strategy and is shared transparently with the Stakeholders of the companies comprising the Group through the public dissemination of non-financial information, including that related to the social value generated.

An annual sustainability report is therefore presented to the Company's Board of Directors, which, after independent verification, highlights the Company's performance in terms of sustainability, especially in matters related to transparency and good governance, human capital and compliance. This analysis considers the sustainable value chain, as well as the social value generated for Stakeholders, either directly or in collaboration with the Neoenergia Institute.

5. Principles of action related to the generation of shared sustainable value

The following section describes the principles of action followed by the Company in the exercise of its activities in relation to different aspects of sustainable development common to all Stakeholders and which represent a link with the social value generated.

The principles of action that the Company assumes and promotes in relation to the creation of sustainable and shared value can be summarized as:

- a) Develop a business model based on environmentally sustainable, economically viable and socially inclusive models.
- b) Establish instruments to strengthen the competitiveness of energy products supplied through efficiency in the processes of generation, storage, transport, distribution and

commercialization of energy, and pay special attention to excellence in management of processes and resources.

- c) Implement measures in order to achieve high quality of services and a safe and reliable supply of energy products.
- d) Encourage the reduction of the environmental impact of all its activities while striving to promote the rational and sustainable use of water, address climate change through the development of clean energies and prevent and/or minimize impacts on biodiversity, contaminant emissions and their effects, as well as improving the circularity of its activities and those of suppliers.
- e) Promote the responsible use of energy and the sustainable use of natural resources, minimizing the impacts of its activities, in line with the provisions of its natural capital policies, while promoting awareness of the efficient consumption of products and services among members of the public.
- f) Reinforce the social dimensions of its activities and, in particular, respect for human rights in order to, among other issues, improve the quality of life of people in the communities where the Company and its Subsidiaries operate while promoting access to energy. Special attention must be given to economically disadvantaged customers or those experiencing any other situation of vulnerability.

6. Principles of action in relation to transparency

Transparency is one of the Company's values and a fundamental objective of its communication strategy. It is essential to gaining trust and credibility in the relations between society and the Company's Stakeholders.

The Company assumes and promotes the following principles of action in relation to transparency:

- a) Disseminate truthful, adequate, relevant, correct, complete, clear, reliable and useful information on its performance and relevant activities.
- b) Guarantee honesty in the communication of information, both within the Neoenergia Group and externally, and refrain from disseminating or delivering information that is incorrect, misleadingly presented or may cause confusion among those who receive it.
- c) Ensure respect for the principle of equality with regard to the dissemination of information.

- d) Obtain information from third parties as provided for in applicable regulations.
- e) Promote transparency through the preparation and annual publication of the Company's financial and non-financial information. With regard to non-financial information, the Company must use any of the nationally and/or internationally accepted methodologies and submit information for independent external verification.
- f) Publish information required under applicable regulations other than that indicated in the previous item, as well as information voluntarily disclosed by the Company.
- g) Disclose information on the taxes it collects in the territories where it operates.
- h) Ensure that the principles of transparency of information and collaboration are maintained in relations with the media.

The Company will contribute to the preparation and disclosure of consolidated non-financial information within the Group in accordance with applicable regulations, the *Iberdrola Group's Policy for the Preparation of Financial and Non-Financial Information* and the principles of transparency established in this *Policy*.

7. Principles of action in relation to sustainable event management

The Company assumes and promotes the following principles of action in relation to the sustainable management of events:

- a) Guide management to define objectives that generate beneficial impacts on sustainability and, in particular, on aspects related to human, social and natural capital and the sustainable value chain.
- b) Drive the involvement of impacted Stakeholders while considering their needs and expectations.
- c) Favor the contribution of suppliers and partners within its value chain.
- d) Promote the implementation of sustainable event management systems, considering their importance and complexity, which must be prepared by taking these principles and those established in the *Code of Conduct for Management, Employees and Suppliers* and in the Company's Governance and Sustainability System into account.
- e) Comply with the guidelines set out in *the Group Events Manual* applicable to each specific event.

8. Principles of action for corporate volunteering

The Company may develop corporate volunteering programs and campaigns that promote the participation of its employees in solidarity actions, the objective of which is to put the provisions of the *Corporate Purpose and Values* and this *Policy* into practice in relation to improving people's quality of life, caring for the environment and sustainable development, as well as universal access to energy and the eradication of hunger, including fundraising campaigns for projects that seek to respond to social needs.

During the implementation of volunteer campaigns and programs, the Company will be guided by the following basic principles of action:

- a) Contribute to social development and solidarity.
- b) Improve the workplace environment.
- c) Contribute to the ethical training of professionals while channeling their spirit of solidarity.
- d) Promote the values of participation, commitment, responsibility and teamwork.

1. Foundations Committee

The Group has established a Foundations Committee, which is an internal advisory body that does not perform an executive function. The Committee was created to guarantee proper coordination between foundational entities linked to the Group responsible for executing the sustainable development strategy prepared by the Board of Directors at the respective national subgroup in their respective countries and territories, which in this case refers to the Company (as a Group *subholding* company) and its Subsidiaries in Brazil.

This Foundations Committee is responsible for approving a Sustainable Development Master Plan, which establishes strategic lines of action to be taken at the Group level in terms of sustainable development. These strategies are to be implemented by foundational entities linked to the Group, including the Company and its Subsidiaries.

The corresponding entity in Brazil is the Neoenergia Institute, which is linked to the Foundations Committee.

9. Group-level coordination

Within the specific scope of actions taken at each company, the Vice-Chairpersonship for Regulation, Institutional and Sustainability (or the body that, at any time, comes to assume its powers), through the Company's Sustainability and Reputation Committee (or the committee that, at any time, comes to assume its powers) will coordinate with the Corporate

Sustainability Board and Iberdrola S.A.'s Sustainability and Reputation Committee (or the committee that, at any time, comes to assume its powers) to establish guidelines for coordinating subsidiary relationships. These efforts are aimed at ensuring there is an adequate and consolidated level of maturity and sustainability risk management within the Group.

The companies that comprise the Neoenergia Group are responsible for executing, monitoring and supervising the sustainable development strategy within the Group in accordance with the corporate and governance structure defined in the Governance and Sustainability System. This strategy will be implemented in accordance with the principles of decentralized management through committees and functions focused on sustainable development and reputation.

Neoenergia Group Subsidiaries may request that the Neoenergia Institute, with which they maintain agreements, execute activities of general interest, as well as those related to sustainable development that were previously determined by the Company and its Subsidiaries. These initiatives will contribute to improving relations and dialog with Stakeholders, without prejudice to the autonomy and independence of action that Neoenergia Institute maintains to achieve its corporate purpose.

10. Implementation and monitoring

During the implementation and monitoring of the provisions of this *Policy*, the Board of Directors relies on the performance of the Sustainability and Reputation Committee (or the committee that, at any time, comes to assume its powers), within the scope of its attributes, and the Office of the Corporate Superintendent for Sustainability. The Superintendent is responsible for the implementation, monitoring and updating of this *Policy*, in addition to developing the necessary procedures for this purpose.

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This *Policy* was initially approved by the Board of Directors on July 19, 2018 and was last revised and modified at a meeting of the Board of Directors held on June 18, 2026.