

Climate Action 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 its performance. It may also provide notice of, as applicable, the policies that it autonomously decides to approve at companies that are part of the group where the controlling company by law is the Company (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"), the Board of Directors hereby approves this Climate Action 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).

Climate change is one of the most relevant challenges currently faced by humanity. Anthropogenic greenhouse gas emissions, which are mainly generated by the use of fossil fuels and land-use change, have accelerated global warming in recent decades and its consequences are visible. Global efforts aim to keep the increase in the planet's temperature well below 2°C above pre-industrial levels while pursuing efforts to limit the increase to as close as possible to 1.5°C.

The Company, which is aware of its commitment to the environment in general and to combating climate change in particular, has incorporated proper environmental management practices and the fight against climate change as key axes of its Governance and Sustainability System. In doing so, the Company is inspired by the best available references in matters of climate governance. The Company is therefore aware of the potential contribution of its activities to achieving climate-related decarbonization objectives, as well as the need to have the appropriate skills and mechanisms in place with regard to adaptation to climate change.

With these efforts, the Company seeks to continue: (i) assuming a leadership position in the fight against climate change, either directly or through alliances with other agents; (ii) fostering a business culture aimed at promoting the awareness of the magnitude of this challenge and the benefits associated with combating climate change among its Stakeholders while taking the impact of this phenomenon on the Company's business activities into account; and (iii) contributing to a carbon-neutral and sustainable future while minimizing the environmental impact of its business activities and promoting the

adoption of all measures within its reach for this purpose—efforts that must be compatible with the realization of business interests.

The Company will continue to analyze and identify concrete actions in the fight against climate change, that enable it to identify and take advantage of opportunities that may arise from improved electricity generation and an increase in the capacity to adapt, strengthen resilience and reduce vulnerability to climate change, as established in the Paris Agreement.

1. Scope

This Policy shall apply to the Company. Nevertheless, it includes principles that complement the contents of the *Core Ethical Principles of Governance and Sustainability* within the scope of climate action. 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 will ensure regulations at the companies in which it holds an ownership interest, but which are not part of the Neoenergia Group, as well as *joint ventures*, temporary company associations and other entities it manages, are aligned with the principles contained in this Policy.

2. Purpose

The purpose of this Policy is to establish a framework for disseminating the strategy and business model of the Company and its Subsidiaries as an Iberdrola Group *subholding company* in Brazil in a manner consistent with its commitment to the fight against climate change.

3. Principles of action

In order to put its commitment to climate change into practice, the Company will be guided by the following principles of action which will apply progressively to its business activities:

- a) Contribute to the Group's emissions mitigation objectives and successive revisions carried out in accordance with climate science and the provisions of the *Climate Action Plan* (the “**Climate Action Plan**”).
- b) Integrate climate change into strategic planning and decision-making processes, as well as in the analysis, management and reporting of climate-related risks,

especially over the long term. While doing so, the Company must consider the recommendations of the *Task Force on Climate-related Financial Disclosures* (TCFD), or other reference organizations that provide information on climate governance and on the impacts, risks and opportunities in this context required under applicable regulations.

- c) Identify, quantify and assess the value of the impacts, dependencies, risks and opportunities related to climate change with regard to the Company's activities and its value chain in a progressive and continuous manner during the life cycle of facilities while considering the perspectives of its Stakeholders.
- d) Promote innovation aimed at reducing greenhouse gas emissions through more efficient and less greenhouse gas-intensive technologies and gradually introduce them into the facilities at the Company and its Subsidiaries.
- e) Involve Stakeholders in periodic updates to the Climate Action Plan through collaborative communication based on the creation of sustainable value for all in accordance with the provisions of the *Stakeholder Relations Policy*.
- f) Include the execution of the *Climate Action Plan* among the parameters that can be considered under remuneration systems for Company employees and managers.
- g) Contribute to promoting awareness on climate change, its consequences and solutions, as well as the need to act in a preventive manner through actions focused on generating knowledge and the mobilization and promotion of climate action, as it constitutes a threat to individuals and communities. These efforts must be aligned with the commitment assumed by the Group's companies to respecting the right to a clean, healthy and sustainable environment in communities located in the territories where it operates, as described in the *Neoenergia Group's Core Ethical Principles of Governance and Sustainability*.
- h) Promote knowledge and internal training among professionals in the field of climate change, as well as third-party workers.
- i) Build knowledge among members of the value chain on the subject and encourage them to adopt practices consistent with those of the Company in this matter and, in particular, with regard to reducing their carbon footprint.
- j) Publicly support and lead key milestones of the global climate agenda and multilateral processes on climate change. The Company must adopt positions consistent with the Company's objectives and the natural capital policies of its Governance and Sustainability System.

- k) Foster regulatory development with the participation of the private sector on issues related to the energy transition, environment, competitiveness and industrial development at the global level.
- l) Integrate climate action into an environmental management model that links the Group to the circular economy and biodiversity in order to assess, analyze, manage and reduce risks to natural capital, as well as to improve resource management and optimize investments and costs. The Company must consider relevant climate variables.
- m) Foster a culture that promotes the efficient and responsible use of energy, as well as behaviors that favor this responsible use. All Company Stakeholders must be involved in this process. In particular, employees must be encouraged to contribute, through their daily work, to the achievement of objectives related to combating climate change.
- n) Promote the research and development of methodologies for the evaluation and planning of adaptation measures and implement appropriate measures capable of mitigating the impacts of climate change through the production of energy from renewable sources. This process must integrate climate science into the establishment of objectives and internal procedures.
- o) Continue to develop due diligence processes in the management systems of incidents, risks and opportunities related to climate action while following the *Climate Action Plan*.
- p) Continue to identify actions and opportunities in response to climate-related impacts and risks in the Company's direct activities and promote the identification of such impacts and risks throughout the value chain. These efforts must be made in collaboration with its Stakeholders through the implementation of the corresponding due diligence system. The global nature of current value chains, and the fact that not every link will have sufficient traceability mechanisms, must be taken into account.

4. Priority lines of action

The Company will establish the following priority lines of action for the principles of action contained in this *Policy*:

- a) Ensure the *Climate Action Plan* is kept up to date.

- b) Contribute to the electrification of the economy and maintain the Group's leadership in renewable energy, as well as in the investment and operation of smart grids, which enable high levels of renewable energy integration. The Company must support legislative and regulatory initiatives aimed at:
- i. greater electrification of end uses and economic activities, such as electric mobility, heat pumps and efficient domestic heating and air conditioning systems;
 - ii. promote the “polluter pays” principle, advocating the implementation of emission pricing mechanisms that generate a strong and sustainable price signal, capable of generating the necessary resources to equitably finance sustainable energy projects in industrialized countries and emerging and developing economies. These efforts must support a taxation system that incorporates this principle in the transport, construction and electricity production sectors;
 - iii. eliminate, as much as possible, subsidies for high-emission technologies or sectors;
 - iv. promote the electrification of power generation systems by expanding the use of renewable sources and smart grids, with a consequent reduction in the use of fossil fuels in the energy sector and in the economy as a whole; and
 - v. continue developing the global energy transition by promoting electricity generation through renewable sources and smart grids and the consequent reduction in the use of fossil fuels in the energy sector and in the economy as a whole.
- c) Integrate climate science and adaptation and resilience criteria, as well as include technical improvements in the design, construction and management of energy generation, storage and distribution networks and infrastructure, to reduce or avoid the potential impacts of climate change on their functionality and allow Group companies to adapt to changes in energy demand caused by climate change.
- d) Analyze risks arising from climate change in the context of the energy transition, as well as the physical risks.
- e) Periodically supervise the Neoenergia Group's greenhouse gas emissions inventory and establish control and monitoring mechanisms, including verification of emissions by an independent third party.

- f) Develop communication campaigns and materials, *workshops* or educational resources aimed at specific groups, or collaborate on projects with third parties, in both the public and private sectors, to promote communication and training of employees with regard to climate action.
- g) Formalize agreements and collaborate with multilateral and social organizations with a special involvement in combating climate change and in the economic and industrial agenda related to the Company.
- h) Support public policies and strategies that address the issues associated with climate change in a coordinated and consistent manner.
- i) Maintain leadership in the main international indices related to combating climate change and its impacts.
- j) Transparently communicate the Group's results and/or performance related to the fight against climate change.
- k) Establish the necessary mechanisms to ensure the coordinated application of this Policy at the Company and its Subsidiaries.

5. Group-level coordination

The Vice-Chairpersonship for Regulation, Institutional and Sustainability (or the office of the superintendent that, at any time, comes to assume its powers) must coordinate with Iberdrola, S.A.'s Technology Board (or the board or office of the superintendent that, at any time, comes to assume its powers) within the specific scope of actions taken at each company. The Vice-Chairpersonship must establish a framework for coordinating relations with its Subsidiaries to ensure an adequate level of consolidated maturity and management of climate action-related risks.

6. Implementation and monitoring

As part of the implementation and monitoring of the provisions of this Policy, the Board of Directors has implemented an Office of the Corporate Sustainability Superintendent (or the office of the superintendent that comes to assume its powers) through the Company's Sustainability and Reputation Committee, which establishes a procedure for periodic monitoring and reporting to the governance bodies.

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This Policy was initially approved by the Board of Directors on July 19, 2018 as the Policy for Combating Climate Change and was revised and renamed the Climate Action Policy

in 2024. This Policy was last revised and updated at the Board of Directors' Meeting held on June 18, 2026.