

Basic Internal Audit Standard

Updated June 18, 2026

HEADING I. THE STANDARD

Article 1 - Nature and scope of application

1. This Basic Internal Audit Standard (the "**Basic Standard**"), which is part of the Governance and Sustainability System of Neoenergia S.A. (the "**Company**") regulates, among other aspects, the nature, competencies, organization and attributions of the members of the Internal Audit function that correspond to the Internal Audit and Risks Board of the Company.
2. The Basic Standard also establishes the normative references on internal audit that must inform the performance and development of guidelines that, in the exercise of their powers and under the protection of their autonomy, are carried out by the other companies of the Company, which, in any case, must respect the coordination criteria provided for in this Standard and in the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group* (the "**Ethical and Basic Principles of Governance and Sustainability**") and the "**Group**") adopted by the Company's Board of Directors.

The Internal Audit and Risks Board constitutes an internal unit of the Company, reporting hierarchically to the Board of Directors and functionally to the Audit and Compliance Committee (the "**Committee**"). Its fundamental activity is to ensure, independently and proactively, the effectiveness of the governance, risk management and internal control processes within the scope of the Company and the companies that are part of the group, whose controlling entity is, in the sense established by law, the Company (the "**Subsidiaries**" and the "**Neoenergia Group**").

Article 2 – Approval, Modification and Prevalence

1. In accordance with the provisions of the Rules of the Audit and Compliance Committee, the Basic Standard and its amendments must be approved by the Board of Directors, upon proposal by the Committee.
2. Without prejudice to the foregoing, the Board of Directors may establish modifications to this Basic Standard without a prior proposal from the Committee, within the scope of the reform of other standards of the Governance and Sustainability System.

3. This Basic Standard develops and complements the guidelines established in the *Rules of the Audit and Compliance Committee*, applicable to the Internal Audit and Risks Board, which prevail over the former in case of contradiction.

Article 3 – Interpretation

1. Any issues that may arise in relation to the interpretation and application of the Basic Standard must be resolved by the Company's Director of Internal Audit and Risks, who will take into account the provisions of the Governance and Sustainability System, the International Standard for the Professional Practice of Internal Auditing approved by the Institute of Internal Auditors (IIA), and other applicable standards. In case of controversy, the opinion of the Committee will be requested.
2. The Director of Internal Audit and Risks will inform the interpretative criteria of the Basic Standard to the members of the Internal Audit and Risks Board (or the board, department or equivalent function that assumes its powers) of the other Subsidiaries; and to the Secretary of the Committee, who, in turn, will communicate them to the Secretary of the Company's Board of Directors.

Article 4 – Compliance

1. The members of the Internal Audit and Risks Board have the obligation to know and comply with this Basic Standard, which will be part of the Internal Audit and Risks management tools.
2. The Company's professionals have an obligation to know this Basic Standard and to respect the provisions applicable to them, for which the Director of Internal Audit and Risks will ensure, where appropriate, its adequate disclosure and inform about its modifications.
3. The Director of Internal Audit and Risks shall have the obligation to ensure compliance with this Basic Standard.

HEADING II. COMPETENCIES OF THE INTERNAL AUDIT AND RISK BOARD

Article 5 – Scope of Competences

1. The Internal Audit and Risks Board will provide, independently and objectively, assurance and consulting services to add value and improve the Company's operations, providing a systematic and disciplined approach to assess and improve the effectiveness of risk management, control and governance processes within the Neoenergia Group.

2. In the exercise of its functions, as well as in the preparation of the annual plan of activities of the Internal Audit and Risks Board, as provided for in Article 11 of this Basic Standard, the competences regarding the assurance of other areas of the Company must be taken into account, so that the responsibilities of the Internal Audit and Risks Board are clearly defined and there are adequate mechanisms for coordination with the other assurance functions.
3. The Internal Audit and Risks Board must be informed about the provision of assurance services to be carried out by external service providers.
4. In addition to the powers provided for in this Basic Standard, the Internal Audit and Risks Board will have others that are assigned by the Board of Directors or the Governance and Sustainability System.

Article 6 – Powers regarding the Audit and Compliance Committee

1. The Internal Audit and Risks Board assists the Committee in the development of its powers, especially with regard to supervising the effectiveness of the internal control and risk management system, relations with the external auditor and supervising the process of preparing the Company's financial and non-financial information.
2. The Director of Internal Audit and Risks will be in charge of preparing the information the Committee needs. In addition, he will participate in the meetings to which he is called, when aspects that are within his respective scope of competence are discussed (among others, the meetings held at the time of the formulation or approval of annual or interim financial information and non-financial information).

In particular, the Director of Internal Audit and Risks will provide the Committee, without limitation and within its area of competence, with the necessary information so that it can: (i) supervise the effectiveness of the internal control and risk management systems, and (ii) conclude that the accounting policies have been applied correctly.

3. The Internal Audit and Risks Board will be the body of usual communication between the Committee and other areas of the Company, without prejudice to the provisions of the Bylaws of the Board of Directors and the Bylaws of the Audit and Compliance Committee, with regard to the functions entrusted to the other areas, in particular, to the Secretariat of the Board of Directors or other Boards.

Article 7 – Powers regarding the internal control system

1. The Internal Audit and Risks Board will supervise, objectively and independently, the effectiveness of the internal control system established within the Neoenergia Group, composed of a set of risk management and control mechanisms and systems.
2. In particular, including, but not limited to, within the scope of their respective competencies, will be responsible for:

a) Oversee effective operation:

- i. The risk control and management system implemented within the Neoenergia Group, as defined in the *Iberdrola Group's General Bases of Control and Risk Management*, adopted by the Board of Directors, and its adequacy to ensure compliance with risk guidelines and limits.

In order to ensure the independence and objectivity of the Internal Audit function, the assurance work to be performed to evaluate the risk management activities will be carried out by independent professionals who will report their findings directly to the Committee.

- ii. The Internal Control Systems for Financial Information (SCIIF) and Non-Financial Information (SCIINF) established for the preparation and presentation of financial and non-financial information for all Subsidiaries, including information that the Company, as a publicly traded company, is required to disclose periodically.
- iii. The Company's Compliance System, which aims to prevent, manage and mitigate the risk of irregular conduct and unlawful acts or acts contrary to the law and the Governance and Sustainability System that may be committed within the organization.
- iv. The mechanisms established for the implementation of Governance and Sustainability System policies.

- b) Verify that the investment and divestment processes comply with the guidelines and risk limits applicable in each case, and that the procedures under which they are carried out ensure adequate internal control and effective management of associated risks.

3. The Internal Audit and Risks Board must carry out any other actions that may be necessary for the development of its function to ensure the effective functioning of the internal control system.

HEADING III. ORGANIZATION OF THE INTERNAL AUDIT AND RISK BOARD

Article 8 – The Director of Internal Audit and Risks

1. The Director of Internal Audit and Risks must have the knowledge, skills and experience appropriate to the functions he/she must perform, especially in matters of Internal Audit, risk management, internal control and governance.
2. As provided for in the Governance and Sustainability System, the appointment and dismissal of the Director of Internal Audit and Risks must be carried out by the Board of Directors, upon proposal by the Committee.
3. In general, the Director of Internal Audit and Risks will have the necessary powers to perform the functions he is called upon to perform.
4. The Director of Internal Audit and Risk will act transparently, informing those involved, whenever possible, of the purpose and scope of their actions.
5. The Committee is the body responsible for evaluating the operation of the Internal Audit and Risks Board and the performance of its Director, in accordance with the provisions of the *Bylaws of the Audit and Compliance Committee*.
6. The Director of Internal Audit and Risks will manage the operation and budget of the Internal Audit and Risks Board under the principles of independence and efficiency in management, and will be responsible for the execution of the corresponding measures and action plans and for ensuring the proper fulfillment of its functions;
7. The Director of Internal Audit and Risks may seek the collaboration and advice of professionals, external or internal, in cases where it is considered necessary.

Article 9 – Coordination framework and information relations between the Company's Internal Audit and Risks Board, the Internal Audit departments of the Subsidiaries and the Internal Audit and Risks Board of Iberdrola, S.A.

1. In accordance with the *Bases for the definition and coordination of the Iberdrola Group* adopted by the Company's Board of Directors, the Company, as a subholding company of the Group in Brazil, has an Internal Audit function, without prejudice to the particularities that may be applicable to them, when appropriate, due to its status as a publicly-held company, nationality, legislation or any other circumstances. The Company's Internal Audit and Risks Officer, based on the coordination and information relations framework established by the Internal Audit and Risks Officer of Iberdrola, S.A., as the Group's holding company, will establish a complementary coordination and information relationship framework between the Company's Internal Audit and Risks Board and the other Internal Audit departments or functions of its Subsidiaries, developing a strategy, guidelines and general supervision of the Internal

Audit function at the Group level, for the Company and its Subsidiaries under the terms established in this Basic Standard and, as applicable, in the *Basic internal audit standard* of Iberdrola, S.A., and respecting at all times the corporate autonomy of the Subsidiaries.

1. The Director of Internal Audit and Risks and those responsible for the Internal Audit departments of the Subsidiaries will hold periodic coordination and information meetings. These meetings may also have the participation of professionals that the Director of Internal Audit and Risks deems appropriate for the proper development of the function.

HEADING IV. RESOURCES, BUDGETS AND ANNUAL ACTIVITY PLAN

Article 10 – Material, human and technological resources

The Director of Internal Audit and Risks will have the human, financial and technological resources necessary for the performance of his duties, including the hiring or participation of specialists for those audits or jobs that require special qualifications to perform them.

Article 11 – Annual plan of activities and budget

1. The Director of Internal Audit and Risk will prepare a proposal for the Internal Audit and Risk Department's annual activity plan in accordance with the guidelines and instructions established by the Internal Audit and Risk Division of Iberdrola S.A. and will submit it to the Committee for approval. This proposal, in relation to the Internal Audit functions:
 - a) will contain the budget of the Internal Audit and Risks Board for the development of its activities during the following year;
 - b) will consider key risk areas, both financial and non-financial (including reputational risks) and business;
 - c) clearly identifies and delimits the responsibilities of each corporate and business area for proper coordination with other assurance functions that may exist, such as control of financial and non-financial information, Compliance and external audit;
 - d) establishes the objectives of the audit and the work to be carried out, as well as the resources necessary for its execution, both human (internal and external) and financial and technological; and

- e) shall take into account the suggestions made by the Board of Directors, the Committee and the members of senior management.
- 2. The Director of Internal Audit and Risks will carry out periodic reviews of its Annual Activity Plan, in order to assess its adequacy to cover the identified risks and, if applicable, propose to the Committee, for its approval, the modifications it deems appropriate, and will report on the execution of the plan under the terms provided for in paragraph 2 of article 12.
- 3. The Committee will assess compliance with the Internal Audit function's Annual Activity Plan.
- 4. Once approved by the Committee, the budget of the Internal Audit and Risks Board will be forwarded for approval by the Company's Board of Directors.

Article 12 – Communication and Information

- 1. The nature and scope of the consulting work to be performed by the Internal Audit and Risk Board will be agreed upon in advance with the relevant department. In no case may the Internal Audit and Risks Board assume managerial responsibilities or participate in executive decisions.
- 2. The Director of Internal Audit and Risks:
 - a) It will periodically report to the Committee and senior management on the implementation of the Annual activity plan, including any impacts and limitations to the scope that may arise during its development, as well as the results and follow-up on recommendations.
 - b) It will submit to the Committee, at the end of each fiscal year, a report on the activities of the Internal Audit and Risks Board, which must contain, at least, a summary of the activities and reports carried out during the year, explaining the work that, foreseen in the annual plan, was not carried out or that was not initially foreseen, as well as an inventory of the weaknesses, recommendations and action plans and the results of the *Quality Assurance and Improvement Program*,
 - c) It shall periodically report to the Committee on whether the Company's senior management takes into account the conclusions and recommendations set forth in the reports issued by the Internal Audit and Risk Department, and shall also report on instances in which they decide not to implement a recommendation regarding a critical or high-risk issue, thereby accepting the existing risk.
- 3. The Director of Internal Audit and Risks will promote constant and fluid communication with the members of the Company's senior management, in order to ensure that they

are aware of the competencies of the Internal Audit function and that they support it in achieving its objectives.

HEADING V. ACCESS TO INFORMATION AND DUTIES OF ITS MEMBERS

Article 13 – Access to information and collaboration

1. The Internal Audit and Risk Board, through its Director or a person designated by the Director, shall have access to the documentation, information, or information systems it deems necessary or appropriate for the exercise of its duties, in all cases complying with applicable laws and the Company's internal regulations.
2. In the exercise of its powers, the Audit and Risk Board may seek the collaboration of any member of the Company's team of directors or employee, as well as other specialized areas, both internal and external.

Article 14 – Duties

1. The members of the Internal Audit and Risks Board shall:
 - a) Act independently of the rest of the organization and perform its work in accordance with the *Global Internal Audit Standards*, including, in particular, the principles of ethics and professionalism, integrity, objectivity, competence, professional zeal and confidentiality.
 - b) Refrain from disclosing the information, data or reports to which you have access in the exercise of your position, as well as from using them for your own benefit or that of third parties, without prejudice to the applicable transparency and information obligations. This obligation of confidentiality remains even if they have ceased their duties.
2. Professionals on the Internal Audit and Risks Board undertake to comply with the guidelines established in the *International Standard for the Professional Practice of Internal Audit* approved by the Institute of Internal Auditors (IIA), in addition to other legal and internal regulations applicable to them.

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This Basic Standard was initially approved by the Board of Directors on October 24, 2018 and last modified at the Board of Directors' Meeting on June 18, 2026.