

ANTITRUST POLICY

Approved on June 18, 2026

1. Introduction.

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 that govern its performance. They may also provide notice of, as applicable, the policies that they autonomously decide 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 exercising these powers and within the framework of applicable law, the Company's *Articles of Incorporation*, and the *Iberdrola Group's Purpose and Values* (the "**Purpose and Values**"), in line with the objective of promoting free competition for the benefit of consumers and users and complying with relevant legislation, the Board of Directors hereby approves this *Antitrust Policy* (the "**Policy**"), which respects, elaborates upon, and adapts, with respect to the Company, the *Neoenergia Code of Conduct for Managers, Professionals, and Suppliers* (the "**Code of Conduct**") and the *Iberdrola Group's Ethical and Basic Principles of Governance and Sustainability* (the "**Ethical and Basic Principles of Governance and Sustainability**" and the "**Group**," respectively).

2. Scope

This *Policy* shall apply to the Company. Nevertheless, it includes principles that complement, in the scope of antitrust practices, the *Ethical and Basic Principles of Governance and Sustainability*. To this extent, the principles of this *Policy* inform the specific actions and regulations of the Subsidiaries, 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 Neoenergia Group.

The Company will seek to align regulations at the companies in which it holds an ownership interest, but which are not part Neoenergia Group, as well as joint ventures, temporary associations and other entities it manages, with the principles contained in this *Policy*.

In addition, professionals who act as representatives of the Company and its Subsidiaries in companies and entities not belonging to the Neoenergia Group must comply with the provisions of this *Policy* and promote, as far as possible, its application.

3. Purpose

This Policy sets forth the Company's firm commitment, as the Group's subholding company in Brazil, to maintaining effective competition in the markets in which it participates, either directly or indirectly through its Subsidiaries, and in which it operates in accordance with applicable laws and regulations. For this reason, it categorically rejects any form of corrupt, collusive, abusive, restrictive acts or anti-competitive practices or acts aimed at hindering the action of the authorities responsible for supervising these markets. The Company and its Subsidiaries, as well as its officers and

employees, actively cooperate with all of these authorities, facilitating the performance of their duties.

4. Principles of action

For the purpose of promoting open competition in favor of consumers and users, the Company assumes and promotes the following principles of action, which must govern its activities:

- a) Promote a preventive culture based on the principle of "zero tolerance" in relation to antitrust practices.
- b) Establish appropriate controls and preventive measures (including, but not limited to, the implementation of internal policies and procedures approved for this purpose) in order to prevent, detect, and deter anticompetitive conduct and other related risks.

Specifically, and in accordance with the provisions of this Policy, specific competition law guidelines will be developed to provide professionals with additional guidance and direction for acting in specific situations involving potential risk and, in particular, rules regarding: (i) conduct within industry associations for representatives of the Company and its Subsidiaries who participate in meetings and activities; and (ii) conduct in the event of audits by competition authorities.

- c) Compete in the markets in an open and just manner.
- d) Guide activities towards the objective of contributing to the realization of real and effective competition between companies operating in different economic sectors. Respect the limits of behavior established by the regulations in order to preserve, guarantee and promote a competitive environment.
- e) Avoid any type of collusion with competitors that has as its objective or effect the coordination of their behavior in the market or the restriction of open competition through conduct such as direct or indirect fixing of prices or other market conditions or the allocation of markets or customers.

In particular, refrain from any form of action that falls under the category of cartel and, especially, market or customer sharing in the context of public bids for which the Company or its Subsidiaries may submit proposals (such as submitting complementary proposals, refraining from participating in certain bids, rotating winning bids, or participating in collective boycotts).

- f) Refrain from engaging in interactions with competitors aimed at exchanging information for trade restraint purposes, especially in cases involving strategic information related to future prices or quantities. Refrain from entering into agreements or participating in agreed upon practices with competitors that restrict competition.

Representatives of the Company or its Subsidiaries who participate in meetings in industry associations must therefore take special care and precautions to avoid exchanging commercially confidential information with other competitors or participating in conversations or other communications from which the existence of antitrust agreements or related practices may be inferred.

- g) Analyze and evaluate with particular caution, from the perspective of antitrust practices, agreements that the Company or its Subsidiaries may enter into with companies operating at different levels of the production or distribution chain.
- h) Adopt, if the Company or any of its Subsidiaries maintains a dominant position in the markets in which it operates, guidelines for action in relations with competitors, customers, suppliers and end users, as well as specific precautions to prevent the company from taking advantage of this position to impose abusive conditions on other market operators. Such conditions may involving abuse through exploitation of the opposing party (such as suppliers or customers) through abusive economic conditions and terms or exclusion, expulsion or impairment of the position of competitors in the market or through any other means.
- i) Analyze, prior to implementation, any transaction that may be considered a concentration (including, but not limited to, those that may significantly affect the maintenance of effective competition), in order to determine whether a transaction: (i) qualifies as a concentration; (ii) must be subject to prior notification to the competent authorities; or (iii) requires suspension of execution or implementation until clearance has been obtained from antitrust authorities in the relevant jurisdictions.
- j) Promote the use of the available communication channels, as provided for in the *Code of Conduct*, the *Compliance Policy* and the *Internal Whistleblower Information and Protection System* to report or denounce possible misconduct or potential acts that are unlawful or contrary to the law or the Governance and Sustainability System regarding antitrust matters, which relate to or affect the scope of the Company's activities, those of its Subsidiaries, or those of its suppliers; or its interests and image.
- k) Encourage suppliers to comply with the antitrust policies, rules and procedures implemented within the Neoenergia Group.
- l) Strengthen and develop the culture of compliance with antitrust laws and its decision to promote free and fair competition, reinforcing the awareness of its professionals about the importance of this topic, especially involving the members of the management team in this task, considering that it is a particularly changeable area and with significant implications for the daily activity of the Company and its Subsidiaries.
- m) Implement training programs and communication plans appropriate for the professionals of the companies of the Neoenergia Group on the defense of free competition, which are effective and adapted to the specific business of each company, in order to promote greater awareness of the relevance and possible implications of this topic and, at the same time, provide the necessary tools and knowledge to identify potential risks and mitigate them, frequently enough to ensure that their knowledge on the subject of this *Policy* is always up to date.
- n) Provide all assistance and cooperation that may be requested by antitrust authorities in the exercise of their functions and, in particular, in the investigation of any conduct that may constitute an infringement of antitrust law.

5. General provisions:

Infringements of antitrust legislation may result in serious penalties for the Company

and its Subsidiaries and for their professionals and/or representatives involved, directly or indirectly with anti-competitive practices. As a result, the practice of any act of trade restraint is punishable and will result in sanctions that may include termination of the employment or service contract or supply of materials, depending on the specific case, in addition to civil, administrative and criminal sanctions, as provided for by law.

6. Implementation and monitoring.

To implement and monitor the provisions of this *Policy*, the Company relies on the cooperation of the Secretariat of the Board of Directors and the Board of Directors, which work in coordination with the respective departments, divisions, and functions of Iberdrola, S.A. and its Subsidiaries to develop the necessary rules and procedures to ensure the proper implementation of this *Policy*.

Situations involving non-compliance with this *Policy* must be reported using the Company's reporting channels as described in the *Internal Whistleblower Information and Protection System*.

The Company and its Subsidiaries, to which other policies, standards, or principles, whether sector-specific or derived from the laws of the jurisdictions in which they operate, may also apply, must ensure that such policies, standards, or principles are consistent with the provisions of this *Policy*.

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This *Policy* was initially approved by the Board of Directors on July 17, 2023 and last modified on June 18, 2026.