

Neoenergia Group's Ethics and Basic Principles of Governance and Sustainability

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The Board of Directors of NEOENERGIA S.A. (the “**Company**”) has the power to establish the structure of the group of companies whose parent company is, under the terms provided for by law, the Company itself (the “**Group**”), define its organizational model, and supervise its compliance and development.

In the exercise of these powers, the Company's Board of Directors formulates the present *Neoenergia Group's Ethics and Basic Principles of Governance and Sustainability* (the “**Principles**”). Together with other principles that may be included in certain policies of the Governance and Sustainability System, these Principles guide the Company's standards as well as those approved by the other Group companies in the exercise of their corporate autonomy.

These *Principles*, which must be incorporated by each of the Group's companies into their respective governance and sustainability systems, will also serve as guidelines for the development of their respective actions and activities.

1. Scope of application

The *Principles* are applicable to all companies that are part of the Group, as well as to companies controlled by the Company that are not part of the Group, but over which it exercises effective control, within the limits established by the legal standards and the respective governance and sustainability systems. The rules that are established, in the exercise of their powers and autonomy, by the companies to which these *Principles* apply and that deal with the matters covered herein, must be in accordance with them.

These principles should also guide, when applicable, the performance of Instituto Neoenergia, linked to the Group.

The Company will promote, whenever possible, the alignment of the regulations of the companies in which it participates, but which are not part of the Group, as well as joint ventures, temporary associations and other entities in which it assumes management, with these Principles.

2. Purpose

The purpose of the *Principles* is to establish ethics and basic governance and sustainability criteria applicable to the companies that are part of the Group, which guide the performance and normative developments of the companies that compose it and which contribute to the organization and coordination between them in certain matters, in order to promote the creation of long-term sustainable value for their Stakeholders.

These Principles, together with the Purpose and Values of the Neoenergia Group, constitute the fundamental strategic pillars that govern the standards established in the

governance and sustainability systems approved by the different companies of the Group, promoting an adequate degree of coherence and coordination between them, respecting the autonomy of the respective governance bodies of these companies. Without prejudice to this, the Company's Board of Directors, in the exercise of the powers attributed to it, may establish coordination measures within the Group in certain matters, especially in the policies approved by it and that integrate the Company's Governance and Sustainability System, ensuring, at all times, homogeneity, coherence and rigor as guiding criteria.

These Principles are inspired by international benchmarks, among which the following stand out: the Universal Declaration of Human Rights and the United Nations (UN) Guiding Principles on Business and Human Rights; the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD); the principles that underpin the UN Global Compact; the 2030 Agenda of the United Nations for Sustainable Development (Agenda 2030) and its Sustainable Development Goals (SDGs); the Tripartite Declaration of Principles on Multinational Enterprises and Social Policy of the International Labor Organization (ILO); the Conventions of the International Labor Organization (including Convention 169); and the UN Declaration on the Rights of Indigenous Peoples.

Thus, the Principles contribute to shaping the identity and essence of the Group's societies around ethics, sustainability, governance, human rights and the construction of an electric, healthy and accessible energy model, aligned with the highest standards of transparency, governance, human capital, social, natural, compliance and most widely accepted ethical principles, all within the framework of the social market economy and also considering the sustainable value chain.

3. Ethical principles

The Group's companies aim that their conduct, as well as the actions of persons linked to them or with whom they relate, comply not only with the applicable regulations and their respective governance and sustainability systems, but also with the highest international standards and the most recent legal requirements regarding the application of ethical principles, thus promoting the development of a business culture based on ethics, integrity and honesty.

In this sense, the Group's companies promote ethical leadership in the business communities in which they operate, adopting, in a complementary and voluntary manner, norms and guidelines in contexts where there is no adequate or sufficient legal development, adapting to the reality of the territories where they operate.

The ethical principles that guide the actions and normative developments of the different companies of the Group, in each of the following differentiated areas, are as follows:

A) Business ethics

The Group's companies adopt a responsible business ethic, which allows them to harmonize the creation of long-term value for their shareholders with sustainable development, in order to meet the needs and expectations of their main Stakeholders.

In particular, the Group companies express a clear and firm message of opposition to the practice of any irregularity or unlawful acts or acts contrary to the law or to the respective governance and sustainability systems, ensuring that their relationships with third parties (including, but not limited to, business partners, customers, suppliers, competitors, authorities and other members of their value chain) are based on legality, business ethics, efficiency, transparency and honesty, adopting appropriate due diligence measures for the purpose of fostering fair, sustainable and responsible business conduct throughout the supply chain.

B) Integrity and honesty

- i. **Regarding the development of the activity:** the Group's companies will develop their business activity with integrity, rigor and honesty, complying with the commitments and principles assumed and generating trust with their respective Stakeholders. To this end, they maintain effective mechanisms for communication, awareness-raising, and consciousness-building among their professionals, as an expression of their corporate culture based on integrity, ethics, and honesty.
- ii. **Regarding its institutional performance:** the Group's companies act institutionally with absolute political neutrality, prioritizing their independence and adherence to these *Principles*, ensuring due transparency in their decision-making processes, in order to ensure the effective fulfillment of these objectives.
- iii. **In relation to cooperation with public authorities:** relations with regulatory bodies and agents acting in the exercise of public functions are governed by the principles of legality, transparency, loyalty, trust, professionalism, collaboration, reciprocity and good faith. This includes, in particular, permanent cooperation with tax administrations, since compliance with tax obligations represents one of the main contributions to society — without prejudice to legitimate controversies that may arise in the defense of the social interest, regarding the interpretation or application of the law.

C) Human rights

- i. **With respect to human rights:** Group companies express their respect for and commitment to human rights recognized in national and international law. They act in accordance with the applicable regulations; the United Nations Guiding Principles on Business and Human Rights (UN); the OECD Guidelines for Multinational Enterprises; the principles of the Global Compact (UN); the Tripartite Declaration of Principles Relating to Multinational Enterprises and Social Policy (ILO); the ILO Conventions (including Convention 169); the Universal Declaration of Human Rights; and with the documents and/or texts that may replace or complement the previous ones.

- ii. **Regarding respect for human rights:** the Group's companies demonstrate the strictest respect for human rights recognized by national and international law and, in particular, those that consist of: (i) respecting the right to free movement within each country or territory and rejecting illicit trafficking in persons, child labor, prostitution, sexual abuse, forced or compulsory labor and any form of modern slavery, also seeking to eliminate such situations in its supply chain; (ii) respect and foster freedom of association, collective bargaining and decent work; (iii) not discriminate by any condition or characteristic, such as race, religion, gender identity or expression, sexual orientation or political convictions; (iv) respect the rights of ethnic minorities and indigenous peoples in the places where they operate, promoting open consultation and dialogue that integrate different cultural frameworks and take into account their expectations and needs; (v) respect the right to a clean, healthy and sustainable environment in the communities in which they operate and, in particular, combat the effects of environmental degradation to ensure the full enjoyment of internationally recognized children's rights; and (vi) understand access to energy and natural resources, including water, as a right linked to other human rights and, therefore, collaborate with public institutions in the implementation of protection systems for vulnerable customers and service expansion plans for communities without access to energy.

- iii. **Regarding the recognition of human rights:** assume the universality, indivisibility and interdependence of human rights, as well as the need for their protection through due diligence processes in the relations of the Group's companies with their respective Stakeholders and other audiences, in particular with the Group's employees, customers, communities and the supply chain.

D) **Actions with social content**

- i. **Regarding the progress of communities:** the Group's companies, through their business activity, compliance with tax rules in the various territories in which they operate and their sustainable development strategy, contribute to the progress of the communities where they are present, adding value from an economic perspective and also from other aspects such as business ethics, the promotion of equal opportunities, respect for human rights, the protection of vulnerable groups (in collaboration with public institutions in the implementation of protection systems for vulnerable customers and plans to expand service to communities that do not have access to energy), stimulating innovation and efficiency, care and protection of nature, universal access to energy and water supply, action against climate change and the generation of quality jobs, based on merit, equal opportunities, attracting talent and a sense of belonging, among other initiatives arising from their activities, for the benefit of their respective Stakeholders and contribution to the social dividend.

- ii. **In relation to contributions:** all contributions of a social, cultural or any other type made by the Group's companies, regardless of the legal form they assume — whether a collaboration or sponsorship agreement, donation or any other legal figure or business — and the area for which they are intended (such as the promotion of education, culture, sport, environmental protection or vulnerable groups), must comply with the following requirements: i) have a legitimate purpose; ii) are not anonymous; iii) have been approved, as provided for in a specific procedure, by Neoenergia's Institutional Committee; iv) be formalized in writing; and v) when they involve monetary values, be made through a means that allows identifying the recipient of the funds and proving the contribution. Cash contributions are prohibited.

Before making any of the contributions referred to in the previous paragraph, the corporate area or the proposing unit must comply with the provisions of the internal rules approved for this purpose and, in any case, the Group company that makes the contribution must condition it, in the document that formalizes it, to the maintenance, by the beneficiary, of the requirements and conditions that justified its approval, as well as respect for the objectives for which it was granted.

The Group's companies, by themselves or through third parties, will refrain from making contributions whose objective is not in line with the sustainable development strategy established within the Group.

The foregoing does not apply to gifts and presents of irrelevant or symbolic economic value, which correspond to gestures of courtesy or usual commercial attentions and which are not prohibited by applicable law, by internal rules of the respective Group company or by generally accepted commercial practices.

- iii. **In relation to contributions to political and trade union parties or associations:** it is strictly forbidden for the Group's companies, by themselves or through third parties, to make, directly or indirectly, contributions (regardless of the legal form they assume, such as donations, sponsorships, loans or advances) to political parties in any jurisdiction, including federations and coalitions, as well as to labor unions or associations, unless there is a legal provision as an employer.

4. Principles of action regarding transparency and governance

The principles of action in relation to transparency and governance, which should guide the actions and normative developments of the Group's companies, in each of the following differentiated areas, are as follows:

A) About governance

- i. **Regarding governance:** Group companies adopt advanced corporate governance practices, taking into account applicable legislation and widely recognized good corporate governance practices recommendations, which are based on business transparency and mutual trust with their respective Stakeholders.
- ii. **In relation to external shareholders:** the Company's Board of Directors ensures the reconciliation of the interests of the Group's member companies that have external shareholders with the policies and strategies that have an impact on the Group as a whole. Appropriate measures are established to safeguard the interests of these external shareholders, insofar as they may not be fully aligned with the interests of the other Group companies. In addition, its continuous, effective, constructive and sustainable involvement in corporate life will be promoted. When there are publicly traded companies in the Group, they will have a special framework of reinforced autonomy, which will include appropriate measures to ensure the achievement of this objective.
- iii. **Regarding the separation of functions:** the separation between the functions of strategic definition, organization, coordination and supervision, and the functions of ordinary direction and effective management is organized around a decentralized structure inspired by the principle of subsidiarity and respect for the corporate autonomy of the different companies that make up the Group. The Group companies strictly respect the legal and functional separation of the regulated companies, as well as the autonomy of the other Group companies, especially those with shares traded on the stock exchange. For this, they have specific mechanisms and procedures to prevent, identify and resolve situations of conflict of interest and attribution of competences, whether they are specific or structural and permanent.
- iv. **Regarding remuneration:** both managers and members of the executive team of the Group's companies and the remuneration of all employees are based on principles that properly combine performance evaluation, dedication, loyalty and achievement of objectives that guarantee the results of the respective company.
- v. **In relation to operations with own shares:** the Company regulates in its own policy the basic principles of operation in operations with own shares, as well as the objectives of these operations.

- vi. **Regarding the composition of the corporate bodies:** the Group companies that have a board of directors promote a multiple, independent, diverse, adequate and balanced composition of this body, in aspects such as skills, competencies, knowledge and experiences. In addition, the composition should reflect the social and cultural reality of all the Group's companies, as well as ensure the periodic and staggered renewal of the collegiate.

- vii. **In relation to transactions with related parties and conflicts of interest:** the Company's Board of Directors and, in urgent situations, whoever the Board designates, as well as the boards of directors of the other companies of the Group, will be the competent bodies to approve or authorize the Transactions with Related Parties (as defined in the respective governance and sustainability systems of the Group's companies), except when this competence falls to the general meeting of shareholders in accordance with internal legislation or rules, or has been delegated. In cases where a Related Party Transaction must be authorized by the Company's Board of Directors, or by the boards of directors of the other companies of the Group, and in which the Company does not directly participate in the transaction, the scope of the authorization will be limited to verifying that the transaction is fair and reasonable from the perspective of the Company and, when applicable, of the Company's shareholders other than the related party, while maintaining the competence of the body of the company directly involved to decide whether or not to carry out the transaction. Any conflicts of interest that affect any company of the Group will be analyzed by the boards of directors of the respective company, in accordance with the provisions of the law and its internal rules. Without prejudice to the foregoing, and with respect to conflicts of interest or Related Party Transactions affecting publicly traded companies, the Company's Board of Directors will ensure compliance with the specific rules on these topics that are established in its special framework of enhanced autonomy.

- viii. **Regarding taxation:** it is assumed that the taxes paid by Group companies in the territories where they operate constitute their main contribution to the financing of public expenditure and, therefore, one of their main contributions to the community. The tax strategy is based on three pillars: i) compliance with tax obligations; ii) permanent cooperation with tax authorities; and iii) transparency. In addition, the Company will seek the proper coordination of tax practices adopted by the Group's companies, always focusing on the social interest and supporting a long-term business strategy that avoids tax risks and inefficiencies in the execution of business decisions. In this sense, the Group's companies will comply with the tax rules in force in the territories where they operate, collecting the taxes required according to the legal system and will follow the recommendations of the codes of good tax practices implemented in these places, taking into account the specific needs and circumstances.

- ix. **Regarding transparency:** transparency is one of the distinguishing marks of the Group's companies and one of the central objectives of its communication strategy. It is essential to generate trust and credibility in relations with their respective Stakeholders. The Group companies will disclose, through clear, continuous and responsible communication, true, adequate, relevant, correct, complete, reliable and useful information about their performance and relevant activities, as well as the foundations linked to them. In addition, they will provide information on the taxes paid in the territories where they operate, under the terms indicated in the previous paragraph.

B) Sustainable development

- i. **Regarding the performance in terms of sustainable development:** align the performance of the Group's companies with the *Purpose and Values of Neoenergia Group*, with these Principles and with the provisions of the other standards of their respective governance and sustainability systems.
- ii. **Regarding the sustainable development strategy:** the sustainable development strategy established within the Group is based on principles that promote that corporate activities and business are conducted by the Group's companies with a focus on creating value in a sustainable manner for its shareholders and other Stakeholders related to their respective business activity and institutional reality. This strategy seeks to equitably reward the groups that contribute to the success of each society's business project; consider the social return of new investments by generating jobs and wealth for society with a long-term perspective that provides a better future without compromising present results; and promote the values of sustainability, integration and dynamism.
- iii. **Regarding the management of sustainable development:** the Group's companies make the management of sustainable development compatible with:
 - (i) the competitiveness of the products and services offered, through efficiency in the processes of generation, storage, transportation, distribution and commercialization of energy;
 - (ii) the high quality of service and reliability and security in the supply of energy products;
 - and (iii) the social dimension, especially with respect for human rights as determined in the approved policy for this matter.
- iv. **Regarding the sustainable management of events:** the Group's companies promote the contribution of participants in their value chain and their respective Stakeholders involved in the sustainable management of events, considering their needs and expectations and guiding them towards objectives that generate positive impacts on social capital, natural capital and the sustainable value chain. Guidelines will be established at Group level that must govern the events of the companies that compose it, in order to ensure compliance with the requirements applicable in each case (including, in particular, those provided for in the legislation on safety and health, accessibility, noise, waste, privacy and protection of personal data), also committing to evaluate and report on the results obtained and the lessons learned.

C) Stakeholders

- i. **Regarding the identification of Stakeholders:** each of the Group companies identifies and classifies their respective Stakeholders based on the value chain configured by the activities it develops.
- ii. **Regarding the general framework of relationships:** the Group companies establish a general framework of relationship with their respective Stakeholders within the scope of their activities and operations. This general framework will aim to: (i) encourage the engagement of Stakeholders in the respective business project of the corresponding company, through the creation of shared sustainable value, making them participants in the social dividend generated by its activities; (ii) respond to the legitimate interests of the Stakeholders with which each company of the Group interacts; (iii) generate trust between the Stakeholders, in order to build close, lasting, stable and solid relationships; and (iv) contribute, therefore, to preserve the corporate reputation in the different countries, territories and sectors in which the Group companies carry out their activities.
- iii. **Regarding the objectives of the engagement:** each of the Group companies will encourage dialogue and strengthen the engagement and identification of their respective Stakeholders with their business project, with the objective of achieving a harmony between business values and social expectations and adapting, as far as possible, the policies and strategies established to the interests, concerns and needs of these Stakeholders, using communication instruments such as direct contact, social networks, digital media and applications, consultation procedures, as well as the corporate website.
- iv. **In relation to corporate websites and social media presence:** the corporate websites and social media presence of the Company and the Group companies will contribute to the Company's digital communication strategy and constitute one of the main means to achieve the engagement of their respective Stakeholders in their corresponding business projects. Its structure and content will be appropriate to the relationship policy with their respective Stakeholders and to the general guidelines approved by the Company's Board of Directors.

5. Principles of action with respect to human capital

The basic principles of action in the area of human capital, which should inform the actions and normative developments of the various Group companies in this area, are as follows:

- i. **Regarding equal opportunities and non-discrimination:** foster the development of professional relationships based on merit and equal opportunities, regardless of the personal or social conditions or characteristics of professionals.

The Group's companies promote the participation and representation of the various collectives that make up their human capital, prohibit any form of discrimination, encourage access to professional opportunities and adopt measures to recognize those who, by their professional performance, contribute to the achievement of business strategy and objectives.

In addition, they ensure that the processes related to the selection, hiring, management of professional relations, training and promotion of professionals, in which artificial intelligence is used -especially algorithms-, do not present biases that compromise these processes or make their verification impossible due to limitations of transparency and/or traceability of results.

- ii. **Regarding the prevention of harassment and the firm commitment to combat it:** the Group's companies ensure the effectiveness of the principle of "zero tolerance" in the face of any conduct that constitutes intimidation or harassment and promote, at all levels, a culture of preventing violence in the professional environment, intimidation and harassment in all its forms.
- iii. **Regarding the right to privacy:** the Group's companies respect the right to privacy of their professionals with regard to the processing of their personal data, as well as strictly personal communications of professionals through the internet and means of communication. In addition, they do not disclose personal data of their professionals, except with the consent of the interested parties, in cases of legal obligation or to comply with judicial or administrative decisions. In no case may the personal data of professionals be used for purposes other than those legally or contractually provided for.
- iv. **Regarding the selection and hiring of professionals:** the selection and hiring are guided by criteria of opportunity, non-discrimination, capacity, merit and performance, with the adoption of measures that favor the integration of the best talents, regardless of personal or social conditions and characteristics, as well as the balance between personal and professional life.

The Group's companies promote selection, hiring and promotion processes that ensure that all their professionals are reputable and upright people, in line with the *Purpose and Values of the Neoenergia Group* and with the codes of conduct applicable in each case, valuing their trajectory and rejecting those who, due to their background, do not have the necessary suitability.

- v. **Regarding knowledge management for greater operational efficiency:** instruments are defined to understand and develop mechanisms for releasing knowledge flows within the Group's organizational structure, in a safe environment, with the objective of sharing experiences, monitoring the functioning of the organization as a whole, promoting continuous learning and cultural exchange.
- vi. **Regarding means and resources:** the Group's companies make available to their professionals the necessary and adequate means and resources for the

development of their professional activities, promoting innovation, creativity and efficient resource management.

- vii. **Regarding external activities:** Group companies respect the involvement of their professionals in social and public activities, provided that these do not interfere with their work or affect the reputation of the company and are in accordance with the provisions of the Company's *Code of Conduct for Managers, Professionals and Suppliers*.
- viii. **In relation to professional development:** the consolidation of quality jobs, a sense of belonging, an appropriate professional environment and a professional value proposition will be promoted. The training, qualification and updating of professionals' knowledge is also encouraged. The Group companies carry out periodic performance evaluations based on objective and suitability criteria.
- ix. **Regarding remuneration systems:** the remuneration of professionals is competitive, based on the principle of equal remuneration for work of equal value and allows attracting and retaining the best talent. In addition, its objectives are aligned with those established both in the respective company and in the Group, promoting and developing the best talent in a fair and competitive manner.
- x. **Regarding personal and professional life:** the Group's companies seek a balance between respect for the personal and family lives of their employees and work, favoring a balance between personal and professional life, in addition to stimulating digital disconnection.
- xi. **Regarding the organizational climate:** the Group's companies foster and promote a work environment consistent with the principles of dignity, mutual respect, confidentiality, cooperation and trust, which generates motivation in professionals and strengthens their identification with the values of the organization, promoting the well-being of the team.
- xii. **Regarding occupational safety and health:** the Group's companies ensure a safe and healthy work environment in their facilities and areas of influence, promoting specific programs on the subject and adopting the preventive measures provided for in the applicable legislation, which are also required of their suppliers.

6. Principles of action in relation to natural capital

The principles of action in the area of natural capital, which should guide the actions and regulatory developments of the various Group companies in this area, are as follows:

- i. **Regarding the environment:** the Group's companies develop a business model that takes into account environmentally sustainable economic activities and the respect and protection of a clean, healthy and sustainable environment in the communities in which they operate, complying with or exceeding the standards established in environmental legislation and promoting the minimization of the impacts that their activities may cause to the environment. In addition, they

promote innovation through research and support for the development of new technologies and best practices.

Group companies collaborate with regulatory bodies to promote standards that protect the environment, as well as public policies and strategies that address the effects of climate change in a coordinated and consistent manner.

In addition, the Group's companies implement equitable transition principles that guide the management of the potential impacts that the decarbonization of the economy may have on their respective Stakeholder Groups, including, in particular, Neoenergia's people, local communities, the supply chain, and customers.

- ii. **In relation to biodiversity:** Group companies identify, quantify and evaluate the impacts and dependencies of their activities on natural capital, with special attention to biodiversity throughout the life cycle of their facilities. They do this by promoting research and improving knowledge about the ecosystems of the territories where they operate, ensuring that the protection and promotion of nature are incorporated into their strategy.
- iii. **Regarding climate action:** the Group's companies continue to develop a process of energy electrification through the development of sustainable energy sources, generated from renewable sources, and network infrastructure, as well as by progressively stimulating their value chain and reducing pollutant emissions, progressively introducing more efficient and less carbon-intensive technologies in their facilities. In addition, they seek to integrate action to combat climate change into their internal strategic planning and decision-making processes and contribute to raising society's awareness of this topic and its consequences.
- iv. **Regarding the sustainability of natural capital:** the sustainable use of natural capital is promoted by the Group's companies, encouraging the improvement of the circularity of their activities and those of their suppliers, the sustainable use of natural resources, the implementation of life cycle analysis, the ecodesign of their infrastructures, the application of the waste hierarchy, as well as the optimization of waste management and the use of recycled materials.

7. Principles of action in relation to the value chain

The principles of action in relation to the sustainable value chain, which should inform the actions and regulatory developments of the different Group companies in this area, are as follows:

- i. **Regarding regulatory and ethical compliance:** Group companies seek to ensure that all participants in their value chain, especially their direct suppliers, act in accordance not only with applicable legislation and their respective governance and sustainability systems, but also with widely accepted ethical and sustainable development principles. In particular, they will seek to ensure that participants in the value chain comply with the principles expressed in the

respective codes of conduct, referring to business ethics and transparent management, good professional practices, health and safety promotion, respect for natural capital, quality assurance and safety of marketed products and services.

In addition, they promote the development of responsible practices in the value chain, encouraging joint management (shared responsibility), with strict observance of human and labor rights recognized by national and international legislation.

- ii. **In relation to customers:** the Group's companies, always observing standards of transparency, information and protection, offer services and products with quality equal to or higher than that required by law and encourage responsible consumption, competing in the market and conducting their marketing and sales activities with transparency, based on the merits of their products and services.

The improvement of customer satisfaction, internal and external, is a central element of the activities of the Group's companies, as well as the design and configuration of their products and services, so that they meet or exceed their expectations.

In addition, they guarantee the confidentiality of their customers' data, undertaking not to disclose them to third parties, except with the consent of the customer, by legal obligation or compliance with judicial or administrative decisions. The collection, use and processing of customers' personal data must be carried out in such a way as to ensure the right to privacy and compliance with the legislation on the protection of personal data, as well as the rights recognized to customers by the legislation on information society services, electronic commerce and other applicable provisions.

Contracts with customers will be written in a clear and concise manner, with simple syntax and avoiding ambiguities or redundancies. In pre-contractual or contractual relations with customers, transparency will be promoted and information will be offered on the different existing alternatives, especially with regard to services, products and tariffs.

The Group's companies raise awareness and seek to engage their customers in the commitments and principles related to human capital and natural capital.

- iii. **Regarding value chain management:** the Group's companies adopt responsible practices in the management of their respective value chains and seek to raise awareness and engage their members in commitments and principles related to human capital and natural capital, especially those related to the circularity of their activities and the fight against child, forced or compulsory labor and any other form of modern slavery and the fight against prostitution

They adopt the appropriate and proportional means to collaborate with the members of the value chain, especially direct suppliers, in order to increase their competitiveness, establishing the appropriate programs in each case, promoting the necessary alliances and adapting the selection processes of suppliers and

professionals in the value chain to criteria of objectivity and impartiality, based on sustainability and quality standards and, in any case, avoiding conflicts of interest or favoritism. The Group companies ensure that the members of the value chain comply with these Principles and act accordingly in the face of any violation.

- iv. **Regarding competition:** free market practices and fair competition in the markets are promoted, with the rejection of any illegal or fraudulent practice, through the implementation of effective mechanisms for the prevention, monitoring and sanctioning of irregularities, as well as the promotion of free competition for the benefit of consumers and users. The Group companies provide the assistance and collaboration requested by the antitrust authorities in the exercise of their functions and, in particular, in the investigation of conduct that may constitute violations of competition law.
- v. **In relation to suppliers:** supplier relations are based on principles of business ethics and transparency, seeking continuous improvement and mutual benefit, as well as promoting sustainability, innovation and development activities.

Prices and information submitted by suppliers during a selection process are treated confidentially by the corresponding Group company and are not disclosed to third parties, except with the consent of interested parties, legal obligation or compliance with judicial or administrative decisions.

The Group establishes an organizational, corporate and shared services model to minimize the costs and risks associated with the purchase, supply and contracting of works and services.

- vi. **Regarding operational resilience:** specific defense plans are developed for the protection of critical infrastructures and to achieve resilience, understood as the continuity of essential services provided by the Group's companies. In particular, an operational resilience model of the Group's companies is established that defines methodologies, procedures and tools necessary to ensure adequate operational resilience capabilities, as provided for in the Company's Operational Resilience Policy.

The Group companies designate an interlocutor to manage relations with the competent authorities in the field of operational resilience.

- vii. **Regarding the Neoenergia brand:** it will be a key element of the corporate strategy of all the Group's companies and a lever of value creation that should be used by companies as an element that contributes to the success of their business.

The Group companies ensure that the Neoenergia brand is associated with the principles established in the Purpose and Values of the Neoenergia Group. To the extent that they use this trademark – owned by the Company, – they must comply with Neoenergia's Brand Policy and other internal rules established by the Company.

- viii. **Regarding corporate reputation:** the measurement and management of corporate reputation must identify and consider the legitimate perceptions and expectations of the Stakeholders of the Group's companies, integrating them into its strategy. A coordination framework will be established within the Group for corporate reputation oversight and management.
- ix. **Regarding safety:** a comprehensive safety strategy will be defined with both a preventive and proactive approach to ensure a reasonable level of risk. Strategic safety programs may be established for compliance by the Group. The Group companies: i) promote the protection of personnel, both in the workplace and during professional travel, as well as the protection of people in their facilities or at institutional events; ii) collaborate with their respective Stakeholders involved in security risks, in order to strengthen the coordinated response to potential risks and threats and contribute to the improvement of security at the international level; and iii) provide the assistance and cooperation requested by the institutions and bodies competent in security matters, including regulators, security forces and bodies and governmental, national and international agencies.
- x. **Regarding data protection:** the Group companies may approve specific policies that ensure compliance with applicable legislation, ensuring, in particular, respect for the right to honor and privacy in the treatment of different types of personal data, as well as the adequate protection of information and knowledge, including its confidentiality. The provisions of these policies apply to: i) implementation and design of procedures involving the processing of personal data; ii) products and services offered by the Group companies; iii) contracts and obligations entered into with individuals; and iv) implementation of systems and platforms that allow access, by professionals of the Group companies or third parties, to personal data and the collection or processing of such data.
- xi. **Regarding artificial intelligence:** Group companies use artificial intelligence systems responsibly, transparently, safely and reliably, and will not implement them if they could compromise people's health, safety or fundamental rights.
- xii. **Regarding innovation:** the Group's companies consider innovation as the main tool to promote sustainability, efficiency and competitiveness, being a strategic variable that permeates all businesses and activities developed. This goal, along with digital transformation through the use of new technologies, preserving security and privacy, is present throughout the organization and affects all aspects of the functioning of societies and their corporate bodies. The pillars of the innovation strategy are: sustainable development, promotion of renewable energies, taking advantage of the opportunities of digitization and automation, adoption of emerging technologies and boosting the digital transformation of the Group's companies.

The Group's innovation strategy focuses on sustainable development, the promotion of renewable energies, the exploitation of the opportunities offered by digitization and automation, as well as the commitment to emerging technologies and the promotion of the digital transformation of the societies that make up the Group.

- xiii. **Regarding quality:** the Group's companies develop instruments to strengthen the competitiveness of the energy products and services offered, through efficiency in the processes of generation, transmission and distribution of energy, with special attention to excellence in the management of processes and resources. Such instruments strengthen the sustainable growth model based on a culture of excellence and quality management. The Group's value creation model is based on three strategic pillars: profitable growth, operational excellence and capital optimization, with customers as the central element of all its activities.
- xiv. **Regarding digital technologies:** Group companies develop standards to drive value creation through the effective, safe and innovative use of digital technologies – understood as information technologies (“IT”) and operational technologies (“OT”) – and to ensure the satisfaction of internal and external users according to the levels defined by the Group, balancing value generation, risk and efficient use of resources. The principles of operational resilience and security are considered, as provided for in the General Bases of Corporate Risk Management and in the Company's Digital Technologies Policy. A Digital Technologies Governance Model is established within the Group. The Group's companies seek to be at the forefront of new technologies for the use and generation of value for their businesses, in line with the innovation strategy and the defined strategic objectives. They also support participation in national and international standards groups and the selection of open standards that avoid technological entrapment.
- xv. **Regarding occupational safety and health:** the Group's companies ensure a safe and healthy work environment in their facilities and areas of influence, adopting the preventive measures provided for in the applicable legislation, which are also required of their suppliers. A coordination framework for Group companies is established for this matter.

8. Principles of action regarding risk management and corporate control

A) Risk management

The principles of action in relation to risk management, with the objective of controlling and mitigating risks, which must inform the actions and regulatory developments of the various Group companies in this area, are as follows:

- i. **Regarding management:** integrate the risk-opportunity view into the management of the Group's companies, through the definition of strategy and risk appetite, as well as incorporate this variable into the strategic and operational decisions adopted. All this with the objective of actively contributing to the proper functioning and implementation of the comprehensive risk control and management system.
- ii. **Regarding the functions:** separate, at the operational level, the functions between the areas that assume risks and the areas responsible for their analysis, control and supervision, ensuring an adequate level of independence and a clear identification of the roles and responsibilities of the different agents involved in the control and management of risks in the Group's companies.

- iii. **In relation to corporate governance standards:** develop due diligence, control and monitoring processes for the proper implementation and compliance with the corporate governance standards applicable to each of the Group's companies, as well as instrumentalize their monitoring and measurement.
- iv. **Regarding risk information:** inform with transparency, especially to regulators and main external agents, about the risks of the Group's companies and the operation of the systems developed for their control, maintaining adequate channels to favor communication with these agents.
- v. **Regarding control and risk management:** establish adequate information and control systems to monitor and manage risks.

The Group's companies comply with the provisions of *the Neoenergia Group's General Control and Risk Management Guidelines* approved by the Company's Board of Directors.

B) Corporate control

The principles of action in relation to corporate control, which must inform the actions and regulatory developments of the various Group companies in this area, are as follows:

- i. **Regarding the preparation of financial and non-financial information:** the Company approves principles to be respected and followed by the Group companies in the preparation of financial information and consolidated non-financial information report, in order to ensure that such information and report are prepared from the data provided by the different Group companies, and to clearly delimit the responsibility of the management bodies in this process. The financial information of the Group's companies and, in particular, their annual financial statements will reflect, in all their relevant aspects, the faithful image of equity, financial situation and results, as provided for in the applicable regulations. The non-financial information report will reflect, in all material respects, in a reasonable and balanced manner, the environmental, social and corporate governance performance of the consolidated group, in accordance with the scope defined by current legislation and in accordance with international standards.
- ii. **Regarding the independent auditor:** the relationship with the external auditor must respect its independence and rely on the appropriate instruments to ensure due transparency.

9. Principles of action regarding conformity and compliance

The principles of action in relation to compliance, which guide the normative developments of the various Group companies in this area, are as follows:

- i. **Regarding normative and ethical compliance:** the Group's companies ensure compliance with applicable legislation and their respective governance and sustainability systems, as well as ethical principles, promoting a preventive culture based, on the one hand, on the principle of "zero tolerance" in the face of

irregular conduct and unlawful acts or acts contrary to the law or their governance and sustainability systems and, on the other hand, on the application of ethical principles and responsible conduct that should guide the performance of the members of the management bodies, professionals and suppliers of the Group's companies.

In addition, the Group's companies adopt an ethical leadership posture in the business communities in which they operate, comply with widely accepted ethical principles and promote a preventive culture based on the aforementioned principle of "zero tolerance" against corruption and illicit practices.

To this end, the Company and the other companies of the Group have their own, effective, autonomous, independent and robust compliance systems, in accordance with the best and most advanced international practices applicable to their activities, based on solid ethical principles and respect for legality, which contribute to the full realization of the Purpose and Values of the Neoenergia Group and the social interest.

It is up to the compliance units or functions of each company to supervise the application and effectiveness of their respective compliance systems.

The compliance units or functions of the Group's companies exercise their powers based on the principles of coordination, collaboration and communication, respecting, in particular, the provisions of the respective governance and sustainability systems regarding the decentralization of effective business management and the corresponding individualization and separation of the responsibilities of each of the companies that make up the Group.

The foregoing is understood without prejudice to the bodies dedicated to the prevention of specific risks and the control of activities that become necessary or convenient in certain companies of the Group to comply with the sectoral or national legislation of the countries or territories in which they operate, with which the compliance units or functions will establish the appropriate coordination relationships, in accordance with the applicable legislation.

As part of the Compliance System, the Company and the other Group companies implement programs to prevent the commission of crimes through their respective compliance units (or compliance bodies or functions), with full autonomy and responsibility for their management, which periodically evaluate, modify and update and which have internal information and whistleblower protection systems, as provided for in the applicable legislation.

- ii. **Regarding the conduct of managers, professionals and suppliers:** Group companies approve codes of conduct that apply to their respective managers, professionals and suppliers, as well as to other persons whose activity is expressly subject to the code.
- iii. **Regarding corruption and fraud:** the Group's companies adopt a firm stance of opposition to fraud and corruption in all its forms, making clear their unequivocal will to combat them in their activities.

- iv. **Regarding the performance in matters of separation of activities:** it is the responsibility of the Group companies to ensure that regulated activities and liberalized activities are properly separated within the perimeter of the Group, in accordance with the rules of separation of activities applicable in each case, considering the different regulations of the energy sectors in the various territories in which the Group companies operate and the definition in force at each time and in each location of regulated and liberalized activities.

The Group's companies, in accordance with the legislation in force in each territory where they carry out regulated activities, adopt codes or equivalent internal normative instruments that ensure compliance with the rules of separation of activities by their professionals. Such codes or normative instruments are communicated and disclosed to the professionals and members of the management team of the Group's companies in the respective jurisdictions in which they are applicable, as well as to the external public, especially through the websites of the companies involved.

In particular, the effective decision-making capacity of the Group companies that carry out regulated activities regarding the assets necessary for the operation, maintenance and development of their own activities must be respected, as well as the limits of access to commercially sensitive information of these companies.

- v. **In relation to judicial or administrative decisions:** the Group companies respect and comply with the judicial or administrative decisions rendered but reserve the right to appeal to all applicable instances when they consider that such decisions are contrary to the law and harm their interests.

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