

ANTITRUST COMPLIANCE POLICY

Approved July 17, 2023

1. Introduction.

The Board of Directors of NEOENERGIA S.A. (the “Company”, “Neoenergia”) is vested with the power to design, evaluate and review the Company’s Governance and Sustainability System on an on-going basis and specifically to approve and update the corporate policies, which contain the guidelines governing the conduct of the Company and of the companies belonging to the group of companies of which the Company is the controlling entity (the “Group”, “Neoenergia Group”).

Due to these commitments, in the exercise of its responsibilities, the Board of Directors, with the purpose of promoting free competition in favor of consumers and users and complying with the relevant legislation, approves this Antitrust Compliance Policy (the “Policy”) in compliance with the Law, the Bylaws and the operating guidelines present in the Purpose and Values of Neoenergia.

2. Purpose

2.1. The purpose of this Policy is to establish the general framework and operating principles that should guide the Company's and the Group's companies' activities in the different markets, areas of activity and sectors in which they develop their businesses and in their relations and agreements with third parties, reinforcing and consolidating both the culture of regulatory compliance and free competition, contributing to the efficient reallocation of productive resources, the use of more efficient techniques and the development of products and services of the highest quality, with the consequent increase in the well-being of consumers and society.

2.2. The Policy expresses the Group's strong commitment to maintaining effective competition in the markets in which it operates, in which it will act in accordance with the applicable regulatory standards. For this reason, it categorically rejects any type of collusive, abusive, restrictive or anti-competitive practice or that seeks to hinder the action of the authorities responsible for supervising these markets. Both the Company and the Group's companies, as well as their officers and employees, will actively collaborate with any authorities in facilitating the exercise of their functions.

3. Scope of Application.

3.1. This Policy applies to all administrators, members of auxiliary committees, fiscal council members, and employees from Neoenergia and Group's companies, regardless of hierarchy level, functional level or activity location, as well as third parties acting on behalf of any Group company.

3.2 The companies comprising the Group, after prior consultation with the Company’s Compliance Unit, may adopt policies and standards that adapt and

develop the principles covered in this Policy according to the specifics of each jurisdiction or business. However, such policies and standards shall be in full compliance with the principles set forth in this Policy.

3.3. The Company, in companies in which it has non-controlling equity shares, whenever possible, shall influence through its representatives in the management bodies the adoption of antitrust principles included in this Policy.

3.4. This Policy shall also apply to joint ventures, temporary joint ventures and other equivalent situations, over which the Company has management influence.

3.5. The members of the management bodies and the management team and employees of the Company and Group's companies to which other sector policies, standards or principles also apply, or those derived from specific legislation in jurisdictions where activities are performed, must also comply with them and the corresponding coordination measures will be established so that such policies, rules or principles are consistent with the provisions of this Policy.

4. Main conduct principles

4.1. In order to promote free competition in favor of customers and users, Neoenergia and the Group's companies shall undertake and uphold the following basic conduct principles that govern all their activities:

- a) Promote a preventive culture based on the "zero tolerance" principle towards anti-competition practices.
- b) Establish appropriate controls (including, but not limited to, the implementation of regulations and internal procedures approved for this purpose) in order to prevent, detect and stop anti-competitive behavior and other related risks.

Specifically, and in accordance with the guidelines of this Policy, specific regulations on competition law shall be drafted to provide professionals with guidelines and additional instructions for acting in specific situations of potential risk and, in particular, rules regarding: (i) conduct within the scope of sectorial associations for Company representatives and other Group's companies who attend meetings and activities; and (ii) action in case of audits by antitrust authorities.

- c) Free and fair competition in markets.
- d) Guide its activity towards the objective of contributing to the achievement of real and effective competition between companies operating in different economic sectors, respecting the limits of behavior established by regulations, in order to preserve, guarantee and promote competitive environment.
- e) Avoid any type of collusion with competitors that has as its object or effect

the coordination of their behavior in the market or the restriction of competition through conduct such as the 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 may be considered as cartel formation and, especially, from sharing of markets or customers within the context of public bidding processes in which Group's companies may submit proposals (such as submitting complementary proposals, withdrawing from certain bids, rotation system for winning bids or taking part in collective boycotts).

- f) Abstain from engaging in interactions with competitors aimed at exchanging anti-competitive information, especially when dealing with strategic information related to future prices or quantities and refrain from entering into agreements or participating in concerted practices with competitors that restrict competition.

In this sense, in the context of meetings of industry associations, the Group's company representatives who take part in these meetings must take special care and precautions to avoid exchanging commercially confidential information with other competitors or attending talks or other communications from which they are may infer the existence of anti-competitive agreements or related practices.

- g) Analyzing and evaluating with particular care, from the viewpoint of competition, the agreements that the Company or other Group's companies may sign with other companies that operate at different levels of the production or distribution chain.
- h) If any Group company has a dominant position in the markets in which it operates, adopt guidelines for action in its relationship with competitors, customers, suppliers and end users, as well as specific precautions to prevent it from taking advantage of this position to impose abusive conditions on other market operators - either by abuse of exploitation of the counterpart (such as suppliers or customers) through abusive economic conditions and terms, or by abuse of exclusion, expulsion or prejudice to the position of competitors in the market or by any other means.
- i) Review, prior to implementation, any transaction that could be considered a merger (including, but not limited to, those that could significantly affect the maintenance of effective competition) in order to determine whether the transaction: (i) qualifies as a merger; (ii) must be subject to prior notification to the competent authorities; or (iii) requires a stay of performance or implementation until clearance has been obtained from the competition authorities in the relevant jurisdictions.
- j) Promote the use of available communication channels, as provided for in the Code of Ethics and in the Compliance Policy and the Internal System for Information and Protection of Whistleblowers, to report or denounce possible

irregular conduct or potential illicit acts or acts against the law; the Governance and Sustainability System in anti-competitive matters, which refer to or affect the scope of activities of the Group's companies and/or their suppliers; or the interests and image of the Company.

- k) Encourage suppliers to comply with antitrust policies, rules and procedures implemented by the Group.
- l) Strengthen and develop a culture of compliance with antitrust laws and its commitment to promoting free and fair competition, reinforcing the awareness of its professionals on the importance of this topic, especially involving members of the management team in this task, considering it is a particularly changeable area with significant implications for the daily activities of the Group's companies.
- m) Implement training programs and proper communication plans for the Group's employees on competition law, which are effective and adapted to the specific business of each company, in order to raise awareness of the relevance and possible implications of this topic, and simultaneously provide required tools and knowledge to identify potential risks and mitigate them often enough to ensure that their knowledge of the subject of this *Policy* is always up to date.
- n) Provide all the assistance and cooperation that may be requested by the antitrust authorities in the exercise of their functions and, in particular, for the investigation of any conduct that may constitute an infringement of the antitrust law.

5. General provisions

5.1. Violations of the Antitrust Law may result in serious penalties for the Group and its Employees and/or representatives directly or indirectly involved in corruption practices. Accordingly, carrying out any anti-competition actions is punishable and shall result in penalties that may include termination of employment contract or the service or material supply provision agreement, as the case may be, as well as civil, administrative and criminal sanctions, as provided by law.

5.2. Questions regarding the content and application of this Policy should be forwarded to Neoenergia's Compliance Unit or to the compliance units in the Group's companies, or even registered in the consultation channel made available by Neoenergia.

6. Review and approval

The Neoenergia Compliance Unit shall regularly review the contents of this Policy, ensuring that it contains the recommendations and best national and international practices in force at any time, and shall propose amendments and

updates to the Board of Directors that contribute to the development and ongoing improvement thereof, taking into account any suggestions or proposals made by the Group's employees or third parties.

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This *Policy* was initially approved by the Board of Directors on July 17, 2023.