

Biodiversity Policy

Updated May 29th, 2024

The Board of Directors of NEOENERGIA S.A. (the “**Society**”) is vested with the powers to prepare, assess 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 Society and of the societies that comprise the Group, for which the Society is the controlling entity, within the meaning established by law (the “**Group**”).

In exercising these powers and aware of its commitment to the environment, in general, and the preservation of the biodiversity in the territories, particularly in those where it develops its activity, the Board of Directors approves this *Biodiversity Policy* (the “*Policy*”), in compliance with the provisions of the Group’s *Purpose and Values*.

1. Purpose

The purpose of this *Policy* is to establish a benchmark for integrating the protection and promotion of biodiversity into the Group's strategy, as well as defining the principles of action for the development of a sustainable business model that contributes positively to nature, so that the activities of the Group's societies protect and promote the development and growth of natural heritage, including, particularly, the protection of animals, as living beings endowed with sentience.

The degradation of ecosystems and the unprecedented decline of biological diversity, unanimously pointed out by the scientific community as a direct consequence of the human activities, result in major environmental, economic and social risks, which calls for urgent action to reverse the loss of biodiversity.

The Group’s societies are committed to taking a leading position in the preservation and promotion of biodiversity in its sector of activity and to integrating in its management the United Nations 2050 vision of “Living in harmony with nature”, in which biodiversity must be valued, conserved, restored and used with wisdom, in order to maintain ecosystem services, favor a healthy planet and provide essential benefits for all people.

This commitment aligns with the objectives of the Global Framework for Biodiversity Kunming – Montreal 2022. This goes along with the fulfillment of the sixth, thirteenth, fourteenth, fifteenth and seventeenth Sustainable Development Goals (“SDGs”), approved by the United Nations.

2. Scope

Within the limits established by law, this *Policy* is applicable to all companies comprising the Group and investees not comprising the Group, over which the Company has management influence.

For investees to which this *Policy* is not applicable, the Company shall promote, through its representatives on the management bodies of such companies, the alignment of their own policies with those of the Company.

This *Policy* shall also apply, as appropriate, to the joint ventures, temporary joint ventures and other equivalent associations, when the Company is responsible for the management thereof.

3. Main principles of conduct

To achieve the implementation of its commitment with diversity, the Group's societies shall be guided by the following main principles of conduct, which shall be applied in all its activities and businesses:

- a) Integrate the biodiversity theme in the Group's internal strategic planning and decision-making processes, as well as in the analysis, management and reporting of long-term risks.
- b) Identify, quantify, and value, on an ongoing basis and throughout the life cycle of the facilities, the impacts and the level of dependence of the activities of the Group's societies in relation to natural capital, including the diversity and protection of wild animals, protected and vulnerable species, promoting respect across all lines of actions, in particular, all new projects must assess their alignment with the Do No Significant Harm requirement for biodiversity, established by the European Taxonomy.
- c) Apply the mitigation hierarchy principle (avoid, minimize, repair and, ultimately, offset) in all stages of infrastructure projects.
- d) Avoid locating new infrastructure projects in areas protected due to their ecological, biological, cultural and/or landscape value or in areas classified as been highly valuable for biodiversity, when the value of these areas will be affected, unless they do not exist viable alternative solutions.
- e) Avoid or reduce deforestation associated with its activities and its supply chain.
- f) Manage and offset, on a quantitative and qualitative basis, the negative impacts produced on the environment, striving for the principle of equality and nature-based solutions, enabling the connectivity of populations and encouraging the development of areas of special protection or private preservation.
- g) Develop flora and fauna surveillance plans, especially of protected or vulnerable species, so as to allow the continued assessment of the interaction of infrastructure with the surroundings.
- h) Integrate natural capital management and biodiversity into the Environmental Management System (EMS) within the Group's framework, setting goals, indicators and standards for the control, monitoring and audit thereof.
- i) Identify and establish management plans for invasive species that pose a risk to ecosystems and native species in locations where the Group's societies operates.
- j) Participate in the development of research, conservation, education and awareness projects, collaborating with the Public Authorities, non-governmental organizations, local communities and other Stakeholders on biodiversity issues and related to the fight against abandonment, violence, mistreatment, abuse and trafficking of animals, as established in the *General Sustainable Development Policy*.

- j) Promote biodiversity awareness and training for professionals from Group companies, as well as subcontractors and suppliers.
- k) Report on actions within the Group's framework in terms of biodiversity, the presence of facilities in protected areas, and research, preservation, education, and awareness-raising actions, publishing a biodiversity report on a regular basis.

4. Priority action lines

Biodiversity plays a leading position within the Group's strategy, and therefore four priority action lines have been established, in which the principles mentioned above will be applied:

- a) protect biodiversity and make sustainable use of natural capital, adopting a preservation and mitigation hierarchy, integrating best practices into its management throughout the entire life cycle of facilities and promoting actions for the regeneration and preservation of natural heritage.
- b) identify, quantify and evaluate, on an ongoing basis, throughout the life cycle of the facilities, the impacts and the level of dependence of the activities of the Group's societies on natural capital, with a focus on biodiversity, through the promotion of investigation and improvement of knowledge on ecosystems surrounding the territories where the Group operates.
- c) collaborate with Stakeholders, considering their needs and expectations in terms of biodiversity and participating in projects for the preservation of biodiversity, protection, and respect for animals.
- d) valuing and raising awareness of the importance of protecting and preserving biodiversity through training activities, internal and external education, awards, publications, as well as sponsorship actions, and communicating, internally and externally, the impact of the activities of the Group's societies in this area.

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This Policy was initially approved by the Board of Directors on July 19th, 2018 and last amended at the Board of Directors' Meeting held on May 29th, 2024.