

Corporate Tax Policy

Updated December 13, 2022

The Board of Directors of NEOENERGIA S.A. (the “**Company**”) 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 Company and of the companies that comprise the Group, for which the Company is the controlling entity, within the meaning established by law (the “Group”). The Board of Directors is also responsible for establishing the tax strategy and approving investments and transactions that are particularly important from a tax standpoint because of the high amount or special characteristics thereof.

In the exercise of these powers, and within the legal framework, the Bylaws, the guidelines and rules of action in which the *Purpose and Values of the Neoenergia Group* are materialized, as well as its sustainable development strategy, the Board of Directors approves this *Corporate Tax Policy* (the “*Policy*”).

1. Purpose

The purpose of this *Policy* is to bring together the Company's tax strategy, based on excellence and commitment to the adoption of good tax practices, within the framework of the Group's corporate and corporate governance structure.

The Company’s tax strategy consists basically of ensuring compliance with applicable tax laws and regulations and seeking to establish an appropriate coordination of the tax practices adopted by the Group companies, all within the framework of fulfilling the corporate interest and supporting a long-term business strategy that avoids tax risks and inefficiencies in the implementation of business decisions.

To that end, the Company takes into account all legitimate interests, including public interests, that converge in its business. In this sense, the taxes paid by the societies of the Group in the countries and territories in which it does business are its main contribution to the funding of public purpose needs and, accordingly, one of its contributions to society and to the achievement of goal eight of the Sustainable Development Goals (SDGs) approved by the United Nations (UN).

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

Compliance by the societies of the Group with its tax obligations and its relations with tax authorities shall be governed by the following basic principles of conduct, which are applicable to each of the companies of the Group in compliance with the standards set out in section 5 of this Policy:

- a) compliance with tax laws and regulations in the various states and municipalities in which the companies of the Group operate, paying all taxes due as required by the legal system;
- b) the adoption of decisions on tax matters by the Group companies shall be based on a reasonable interpretation of applicable legal provisions and regulations and in close relationship to the Group's activities;
- c) the prevention and reduction of significant tax risks, ensuring that taxes bear an appropriate relationship to the structure and location of activities, human and material resources, and the Group's business risks;
- d) The strengthening of the relationship with tax authorities, based on respect for the law, loyalty, reliability, professionalism, cooperation, reciprocity and good faith, without prejudice to the legitimate disputes that, subject to the aforementioned principles and in the defense of the corporate interest, may arise with such authorities concerning the interpretation of applicable legal provisions; and
- e) the provision of information to the management bodies on the main tax implications of the transactions or matters submitted to it for approval, when this are a significant factor in making a decision.

4. Good tax practices

In applying the foregoing principles, the societies of the Group adopt the following good tax practices:

- a) not to use artificial structures unrelated to the Group's business for the sole purpose of reducing its tax burden, particularly, not entering into transactions with related parties for the sole purpose of eroding tax bases or transferring benefits to low tax territories;
- b) avoid non-fully transparent structures for tax purposes, which are understood as structures intended to prevent that the relevant tax authorities are able to identify the party ultimately responsible for the activities or of the ultimate owner of the assets or rights involved;
- c) not to incorporate or acquire companies headquartered in tax havens, with the sole exception of those cases in which it is required to do so as a result of an indirect acquisition in which the company based in a tax haven is part of a group of companies being acquired;

- d) cooperate with the relevant tax authorities in the detection of and search for solutions for fraudulent tax practices of which the Company is aware that may be used in the markets in which the societies of the Group has a presence;
- e) provide the information and documents that may be requested by the relevant tax authorities as soon as practicable and with the required scope; and
- f) notify and proper discuss with the tax authorities about all significant issues of material facts of which it has been aware, in order to produce evidence, as the case may be, to the relevant proceedings and to enhance, as far as reasonably possible and without disregarding good business management, the agreements and compliance in the course of the inspection procedures.
- g) make available to whomever so desires the necessary whistleblowing channels that allow the reporting of conducts that may imply any wrongdoing or any act contrary to the law, the Governance and Sustainability System, including the rules of action established in the Code of Ethics and, as a result, acting in tax matters.

5. Application of the Policy within the structure of the Group's corporate and governance structure

Pursuant to the configuration of the Group's corporate and governance structure, the application of this *Policy* shall be governed by the following principles:

a) As related to the Company

The Board of Directors and the Executive Office shall promote the compliance with the tax principles and good tax practices contained in this *Policy* in the Group companies, which activities have a significant reflection in the tax matters.

b) As related to the main business companies

The main business companies shall be responsible for complying with their tax obligations, in all events subject to the tax principles and good tax practices set out in this *Policy* and the standards established by the Company.

Particularly, the boards of directors of the main business companies shall be responsible for ensuring compliance with this *Policy* by the entities of the Group through which their respective businesses are carried out.

The provisions of the preceding paragraphs shall not prevent respect for the corporate autonomy of the branches of the main companies and their own responsibility in complying with their tax obligations in compliance with the principles and good practices set out in this *Policy*.

Without prejudice to the provisions of the law and those previously stated in this item, the management body of each Group company shall be responsible for ensuring that the information promotes compliance with the tax obligations of the tax group to which it belongs, the applicable tax rule, as well as the principles and rules established in this *Policy*. Said information shall in all cases be prepared in compliance with the standards set by each

company pursuant to the procedures that lay down the country's and/or business's tax guidelines.

6. Tracking and control

The companies of the Group shall adopt the control mechanisms necessary to ensure compliance with the tax laws and regulations, principles and good practices set forth in this *Policy*, as part of proper business management. Additionally, proper and sufficiently qualified human and material resources shall be allocated for this purpose.

The Company's Tax Division or the board that assumes its functions shall approve and review, on a periodical basis, the guidelines to assess and manage the tax risk, applicable to all Group companies. The guidelines include objective criteria for classification of the operations according to their tax risk, as well as different procedures for their approval. The Tax Division shall act as responsible for the tax compliance in the Company, aligned with the Compliance Division, ensuring, on a proactive and independent basis, compliance with the tax rules, the principles and good practices contained in this *Policy*.

The main business companies shall inform the Company, on an annual basis, of the level of compliance with this *Policy*.

Moreover, when tax operations or matters are submitted to the approval of the Board of Directors, the tax consequences, representing a relevant factor shall be informed.

Additionally, in compliance with the commitment to transparency in relations and communication with its stakeholders, the company will disclose the most relevant information about the Group's performance in tax matters and its tax contribution to support public charges in the main locations where it operates, ensuring that the information is clear, useful and true.

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This *Policy* was initially approved by the Board of Directors on July 19, 2018 and last reviewed and updated at the Board of Directors' Meeting held on December 13, 2022.