

# Diversity, Equity and Inclusion Policy

Updated September 27, 2023

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

In exercising these powers, aware of its commitment to the human team, the Company's main strategic asset and key to its success, and in compliance with the provisions of the Human Resources Structure Policy, the Board of Directors approves this Diversity, Equity and Inclusion Policy (the “Policy”).

## 1. Purpose

The purpose of this Policy is to achieve a good enabling environment that facilitates and enhances equity of opportunities, non-discrimination, diversity and inclusion of the professionals of companies comprising the Group, investing in a people management model committed to professional excellence and quality of life, all the foregoing in compliance with the applicable law in each country and following best international practices, including the provisions in this area of goal five of the Sustainable Development Goals (the “SDGs”) approved by the United Nations (the “UN”).

Equity of opportunity is one of the essential pillars of professional growth, and its development implies equitable treatment to promote the personal and professional progression of the Group's societies.

Diversity is understood as the set of characteristics that make people unique and singular, i.e., the wealth that each person brings through their variety, including the visible and non-visible conditions.

Inclusion, in turn, refers to how differences between individuals are valued and opportunities are created so that everyone can develop their potential. Thus, the conscious strategy favors the development of structures, systems, processes and culture that generate respect for the particularities of all people in the organization, also promoting a sense of belonging that makes them feel valued and part of a group or community.

## 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, over which the Company has management influence.

### 3. Basic principles of conduct relating to equity of opportunities

To achieve the implementation of the goals and commitments relating to equity of opportunities, within the scope of the Group, the following basic principles of action are assumed and promoted, which must govern the labor relations of the Group's societies:

- a) Ensure the quality of employment, as the fundamental way of promoting equity of opportunities and non-discrimination, fostering the maintenance of stable and high-quality jobs, fair salary that ensure a continuous improvement in the abilities and skills of professionals.
- b) Develop the principle of equity of opportunities at workplace, which fulfillment is one of the essential pillars of the professional development and implies the commitment to practice and show equal treatment that favors the personal and professional progression of the Group's human staff in the following areas:
  - Promotion, professional development and compensation: value the knowledge and skills required to perform the work, through the objective assessment of performance.
  - Particularly, both in the setting of individual proposals of goals, and the performance assessment and, if applicable, in the salary adjustment, criteria of equity of opportunities, non-discrimination and respect for diversity shall be considered, in order to promote personal and professional progression of the people in the Group's companies, and to recognize the knowledge and skills required for each position, in addition to the attributes of the professionals for the creation of value, dedication and responsibility in the performance of their duties.
  - Selection: choose the best professionals through selection tools and systems based on the merits and abilities of the applicants.
  - Hiring: not setting discriminatory wage differences.
  - Qualification: ensure the education and training of each professional in the knowledge and skills required for the proper development of their work.
  - Support for professionals with disabilities so as to promote their effective occupation.
  - Promotion of transparent communication, encouraging innovation and granting the necessary autonomy for the professional in the exercise of their duties.
  - Elimination of any actions contrary to equity of opportunities.
- c) Promote gender equity within the Group's perimeter as regards access to employment, training, professional promotion, and working conditions, respecting individual social and cultural realities, aiming to:
  - Reinforce the Group's societies commitment to gender equity both within the organization and in society, and to raise awareness on this topic in both areas;
  - Enforce the principle of equity of opportunity in the professional development, removing any obstacles that may hamper or limit their professional career by reason of gender.

- Take affirmative actions to correct inequalities that may emerge and promote the access of the underrepresented gender and/or race to positions of responsibility in areas in which they are barely or not present.
  - Enhance mechanisms and procedures for selection and professional development that enable the achievement, by the underrepresented gender and/or race, of the required qualification in all areas of the organization in which their representation is insufficient, including the development of training programs and monitoring of professional development specific to women, which encourage the existence of a significant number of female executives in the Group's societies.
  - Strive to achieve a balanced representation within the various decision-making bodies and hierarchy levels, ensuring equal opportunities in all areas of the Group's societies.
  - Encourage the organization of working conditions to enable the reconciliation of personal and working life for all the Group's societies professionals, irrespective of gender, and ensure the elimination of all gender-based discrimination.
  - Protect pregnancy and childbirth as specific situations of the female professional group, so as to not allow negative impacts on the career of these professionals as a result of these situations.
  - Protect pre-adoption and adoption, preventing this from having a negative impact on their professional career.
  - To encourage the presence of less represented gender in the Group's careers, promote collaboration programs with educational centers and training programs related to business developed by the companies that make up the Group in which the presence of one gender is substantially lower than the other.
  - Collaborate in the fight against gender-based violence, establishing specific programs that include measures to protect, support, inform and monitor victims of gender-based violence.
- d) Standardize working conditions and benefits offered to all part-time and full-time professionals;
- e) Respect, when establishing the working conditions, the principle of equal working conditions for professionals representing the same demand and the same value;
- f) Exclude prejudices that may exist in relation to people whose social, cultural or educational condition do not correspond to models traditionally considered as a reference or usual models or that may unduly condition professional progress, disregarding people's merits and capabilities;
- g) ensure the design of processes related to the selection, hiring, management of labor relations, training and promotion of professionals using artificial intelligence that are governed by the principle of equity of opportunity in the terms described in the previous items and, particularly, ensure that the algorithms used are not biased in a way that violates, due to their design or the result of their effective implementation, the basic action principles assumed within the scope of the Group within this scope, nor render their verification impossible due to

limitations of transparency and/or traceability of the results, as set forth in the Policy on the Responsible Use of Artificial Intelligence Tools and Algorithms.

#### **4. Basic principles of conduct relating to diversity and promoting inclusion**

To achieve the implementation of the goals and commitments relating to diversity and promoting inclusion, within the scope of the Group adopts and promotes the following main principles of conduct, which shall govern the development of labor relations of the Group's societies:

- a) Ensure non-discrimination among its professionals based on nationality, ethnic origin, skin color, marital status, family responsibility, religion, age, disability, social and health condition, gender, sexual orientation, gender identity and expression or any other a condition or characteristic of a person that is unrelated to the requirements for performing the job;
- b) Ensure that all professionals in the Group's societies contribute with their knowledge, experience and skills, irrespective of any personal or social conditions or circumstances;
- c) Promote a sense of inclusion in the Group that aims to ensure that all professionals consider themselves part of the business project and recognize their inclusive role in the local, national, and international community. This is intended to ensure that the values, principles, and goals of the Company are taken on as their own by the people of the Group's societies, and that their contribution is perceived as an essential component not only of professional but also personal development.
- d) Recognize the coexistence of different generations as a source of continuous enrichment, due to their diverse skills and approaches, both for professionals and for the different businesses and corporate areas, and as a decisive contribution to adapting the services provided by the Group to the needs of the communities in which it operates.
- e) Bear in mind that certain limitations in physical and/or intellectual disabilities that may be an obstacle to the development of some tasks represent, on the other hand, a significant added value in other performances. In any case, do not identify such circumstances, on a preliminary and unfounded basis, as obstacles to proper integration at work;
- f) Recognize that the international nature of the Group's societies and the contribution of people from different origins, races or ethnicities represent a source of permanent and decisive enrichment within the Group, which shall be preserved and promoted;
- g) Promote information and communication with the different communities in which the Group's societies operate, so that the Societies is recognized as an optimal space for professional development of its diverse employees, as a result of its inclusive practices, from the perspective of their belief in diversity and inclusion.
- h) Ensure that the selection and hiring processes are based on neutral and objective criteria of merit and qualification, while establishing specific actions to promote the inclusion of groups with less access to the job market.
- i) Address, with integration and reconciliation actions, the situations of those who are single, married, in common-law marriage, divorced, separated,

widows/widowers, living with a plurality of people, with or without children, and with other circumstances of family and affective relations.

- j) Ensure that decisions relating to professional promotion and professional development are based on equitable criteria, in order to eliminate from all corporate decisions the reasons or consequences that are harmful to diversity and promote the adequate inclusion of all professional groups.
- k) Ensure that the training of every professional has the sufficient knowledge, skills and capabilities for the proper development of their work and provide for specific actions in the training and qualification processes that promote the acceptance of diversity and the rejection of discrimination.
- l) Encourage the use of inclusive language in any type of internal or external corporate communication, and eradicate, in any case, the use of discriminatory language.
- m) Preserve a work environment free of violence, intimidation and harassment in all its forms, including sexual and gender-based harassment, ensuring the establishment of agile and effective reporting channels and assistance to alleged victims.
- n) Constantly develop policies to raise awareness among the Group's societies professionals, especially those who have management roles, so that they value and promote the importance of diversity and what it represents for the Group;
- o) Include in leadership programs behaviors that favor decision-making and a culture based on diversity, as well as an internal communication strategy able to convey the plural and inclusive nature within the Group;
- p) Facilitate internal mobility and interaction in the organization in order to promote networks of contacts and teams that take advantage of the multiculturalism. Constantly monitor and update management processes and procedures so that these contacts and common works are produced in order to enhance inclusion and diversity.
- q) In line with the Human Rights Respect Policy, ensure the right to freedom of association provided for in international standards, in order to preserve the option of each individual in the relationship with union organizations and in their action in the defense of their legitimate interests.
- r) Ensure the design of processes related to the selection, hiring, management of labor relations, training and promotion of professionals using artificial intelligence and, mainly, ensure that the algorithms used are not biased in a way that violates, due to their design or the result of their effective implementation, the Group's goals and commitments in terms of diversity and promotion of inclusion, nor render their verification impossible due to limitations of transparency and/or traceability of the results as set forth in the Policy on the Responsible Use of Artificial Intelligence Tools and Algorithms.

To achieve the goals established in this Policy, the Company and the Group have their respective responsible management, reporting to the Company's People and Organization Office, which is responsible for implementing, monitoring and checking compliance with this Policy.

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This Policy was initially approved by the Board of Directors on June 28, 2018, under the title of Equal Opportunities and Reconciliation Policy. Subsequently, as a result of Company's pioneering vocation and as a result of the process of reviewing the Governance and Sustainability System, it approved an Equity, Diversity and Inclusion Policy. On July 15, 2021, the Company's Board of Directors approved the merger of the Diversity and Inclusion Policy and the Equal Opportunities and Reconciliation Policy, creating this Equity, Diversity and Inclusion Policy. On this date, the change in the name of this policy was approved, becoming the Diversity, Equity and Inclusion Policy, having been last updated on September 27, 2023.