

Policy for Development and Responsible Use of Artificial Intelligence Tools

May 29th, 2024

The Board of Directors of NEOENERGIA S.A. (the “**Society**”) is vested with the powers to prepare, assess and review the Society’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 Society’s conduct and of the companies that are part the Group, for which the Society is the controlling entity, within the meaning established by law (the “**Group**”).

As part of its commitment to the social dividend, the Group's innovation and digital transformation strategy shall be geared towards creating sustainable value, in accordance with the commitments made in the Code of Ethics and the Purpose and Values of the Neoenergia Group.

In view of the development and implementation of artificial intelligence tools for the application of the aforementioned strategy, and of the importance of ensuring its responsible use, in accordance with the corporate ideology of the Society and the principles that guide its corporate culture, based on ethics and commitment to sustainable development, the Board of Directors approves this *Policy for Development and Responsible Use of Artificial Intelligence Tools* (The “**Policy**”), in line with the *Recommendation of the Council of the Organization for Economic Co-operation and Development* (“**OECD**”) about Artificial Intelligence.

1. Purpose

The purpose of this Policy is to establish the principles and guidelines for action that should govern the design, development, and application of artificial intelligence tools, understood as any automated system designed to operate with different levels of autonomy and that can, with an explicit or implicit objective, generate results such as predictions, recommendations or decisions that, in turn, influence physical or virtual environments. It also aims to regulate the responsible use of these tools, ensuring compliance with applicable legislation and the Purpose and Values of the Neoenergia Group, the Code of Ethics and other regulations that are part of the Governance and Sustainability System.

In that sense, this *Policy* establishes the principles and guidelines to ensure the responsible, transparent, safe, and reliable use of artificial intelligence systems and algorithms by the Society and other societies of the Group.

2. Scope of application

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 Society has management influence.

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

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.

Finally, the principles established in this *Policy* will also apply to suppliers that develop artificial intelligence tools for the Society or for entities subject to this *Policy*, in everything that applies.

3. Basic Overall Principles of action:

To fulfill the commitment indicated in its “Purpose”, the design, development, application and use of artificial intelligence tools, by companies to which this *Policy* applies, must be carried out in accordance with the following basic operating principles:

a) Principle of respect for human beings and social well-being

Artificial intelligence systems will be developed and used as tools at the service of people, with full respect for human dignity and the environment, in accordance with the state of technology at any given moment and in a way that benefits all human beings, ensuring that its development contributes to achieving the Sustainable Development Goals (SDGs) approved by the United Nations (UN).

The responsible use of artificial intelligence tools will be ensured, in accordance with the Neoenergia Group's commitment to human rights and the principles that form the Purpose and Values of the Neoenergia Group and the Code of Ethics, facilitating that their design and use can be controlled and supervised by humans. In any case, special attention will be paid to ensuring that artificial intelligence systems do not harm health and safety, nor can they have negative repercussions on people's fundamental rights.

b) Principle of diversity, non-discrimination, and equity

It will be ensured that artificial intelligence systems are developed and used in a way that promotes equal access, gender equality and cultural diversity, while avoiding prejudices with discriminatory effects (based on race, ethnic origin, religion, sex, sexual orientation, disability, or any other condition of people) and prejudices.

c) Principle of “innovative culture”

It will be ensured that the design, development, and application of artificial intelligence tools are aligned with the Group's innovation strategy, of remaining at the forefront of

new technologies and disruptive business models, fostering an "innovative culture" that permeates the entire organization and promote motivating work environments that encourage and reward the generation of innovative ideas and practices.

d) Principle of privacy

It will be ensured that artificial intelligence systems are developed and used in accordance with current privacy and data protection legislation, as well as the Governance and Sustainability System, and will also process data that meets the established quality and integrity criteria.

e) Principle of transparency

Artificial intelligence systems will be developed and used in a way that allows adequate traceability and transparency, ensuring that users are aware that they are communicating or interacting with an artificial intelligence system, properly informing affected people about the capabilities and limitations of the said system, as well as the rights that protect them.

f) Principle of Security and resilience

It will be ensured that artificial intelligence systems are developed and used in a way that minimizes unintentional and unexpected damage and is resilient to attempts of unauthorized access, alteration of their use or performance, and illicit use by third parties, ensuring, at all times, continuity in the provision of services.

Artificial intelligence systems will have physical, technical, and logical security systems and mechanisms to protect them and guarantee their correct functioning against any alteration, misuse or unauthorized access (whether physical or cyber), as well as to guarantee the integrity of the data stored or transmitted through them.

In general, and without prejudice to exceptions that may be established for reasons justified by the Department of Digital Transformation (or by the board that assumes its functions in this area), artificial intelligence systems that are classified as high risk according to criteria established in force will not be developed or used.

g) Principle of training and awareness

It will be ensured that creators of artificial intelligence tools receive training on the aspects necessary to understand the risks implicit in the use of these systems, such as legal and ethical considerations, behavioral aspects and best security practices, so that it can be ensured that the end user of artificial intelligence tools can make use of them safely.

4. Instruments and coordination of digital transformation and use of artificial intelligence

To achieve the declared purposes, the Company has a Digital Transformation Board (or the department that, at a given moment, assumes its functions), which may be supported by a Global Artificial Intelligence Coordination Group, and which will act in coordination

with the Local Group of this Company and which, if applicable, are also created in controlled companies. This Local Group will develop the necessary procedures to ensure the correct use of artificial intelligence and the management of potential risks arising from its use.

5. Supervision

The Digital Transformation Board (or the department that assumes its functions) is responsible for monitoring compliance with the provisions of this Policy and reporting periodically to the Audit Committee.

Likewise, the Digital Transformation Board (or the department that, at a given moment, assumes its functions), will review this Policy at least once a year, in order to ensure that its content is adapted to constant advances, innovations, risks and regulations that occur in the matter.

* * *

This *Policy* was initially approved by the Board of Directors on July 19th, 2022 and last modified on May 29th, 2024.