

ANTITRUST POLICY

Approved on October 16th, 2025.

1. Introduction.

NEOENERGIA S.A.'s (the "**Company**") Board of Directors has the power to prepare, evaluate and consistently review the Company's Governance and Sustainability System, as well as approve and update policies that contain guidelines that govern the Company's performance. They may also provide notice of, as applicable, the policies that, during the exercise of their autonomy, they decide to approve at companies that are part of the group where the dominant entity is, as established by law, the Company (the "**Group**").

In the exercise of these powers and within the scope of existing legislation, the Company's Articles of Incorporation and the Neoenergia Group's Corporate Purpose and Values, in order to align with the purpose of promoting open competition in favor of consumers and users and complying with relevant legislation, the Board of Directors hereby approves this *Antitrust Policy* (the "**Policy**"). This Policy will respect, develop and adapt, in relation to the Company, the *Code of Conduct for Neoenergia Management, Employees and Suppliers* (the "Code of Conduct") and the *Neoenergia Group's Ethics and Basic Principles of Governance and Sustainability*.

2. Scope of application.

This Policy is applicable to the Company. Nevertheless, it reports on the actions and regulatory developments that, within the scope of this Policy, are carried out by the other companies of the Group, observing their powers and autonomy in this matter.

These principles must also guide, when applicable, the performance of the Neoenergia Institute, which is linked to the Group.

The Company will promote the alignment of the regulations of the companies in which it holds an ownership interest, but which are not part of the Group, as well as joint ventures, temporary associations and other entities it manages, with the principles contained in this Policy.

Additionally, employees who act as representatives of the Company and other Group companies in companies and entities not belonging to the Group must observe the provisions of this *Policy* and promote its application whenever possible.

3. Purpose

2.1. This Policy explains the Company's firm commitment to maintaining effective competition in the markets in which it participates, whether directly or indirectly through its Group companies, in accordance with applicable laws and regulations. For this reason, it categorically rejects any form of corrupt, collusive, abusive, restrictive acts or anti-competitive practices or acts aimed at hindering the action of the authorities responsible for supervising these markets. Both the Company and Group companies, as well as their directors and employees, actively collaborate with these authorities to facilitate the exercise of their functions.

4. Principles of action

4.1. For the purpose of promoting open competition in favor of consumers and users, the Company assumes and promotes the following principles of action, which must govern its activities:

- a) Promote a preventive culture based on the principle of "zero tolerance" in relation to antitrust practices.
- b) Establish adequate controls (including, but not limited to, the implementation of internal regulations and procedures approved for this purpose) in order to prevent, detect and prevent behavior that restrains trade and other related risks.

Specifically, and in accordance with the provisions of this *Policy*, specific regulations on antitrust laws will be prepared to provide professionals with additional guidelines and guidelines for acting in specific situations of potential risk and, in particular, rules for: (i) conduct within the scope of sector associations for representatives of the Company and other Group companies that participate in meetings and activities; and (ii) action in cases of audits from antitrust authorities.

- c) Compete in the markets in an open and just manner.
- d) Guide activities towards the objective of contributing to the realization of real and effective competition between companies operating in different economic sectors. Respect the limits of behavior established by the regulations in order to preserve, guarantee and promote a competitive environment.
- e) Avoid any type of collusion with competitors that has as its objective or effect the coordination of their behavior in the market or the restriction of open competition through conduct such as 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 falls under the category of cartel and, especially, market or customer sharing in the context of public bids for which Group companies may submit proposals (such as submitting complementary proposals, refraining from participating in certain bids, rotating winning bids, or participating in collective boycotts).

- f) Refrain from engaging in interactions with competitors aimed at exchanging information for trade restraint purposes, especially in cases involving strategic information related to future prices or quantities. Refrain from entering into

agreements or participating in agreed upon practices with competitors that restrict competition.

Representatives of Group companies who participate in meetings in industry associations must therefore take special care and precautions to avoid exchanging commercially confidential information with other competitors or participating in conversations or other communications from which the existence of antitrust agreements or related practices may be inferred.

- g) Analyze and evaluate with particular caution, from the perspective of antitrust practices, agreements that the Company or other Group companies may enter into with companies operating at different levels of the production or distribution chain.
- h) Adopt, if any company of the Group maintains a dominant position in the markets in which it operates, guidelines for action in relations with competitors, customers, suppliers and end users, as well as specific precautions to prevent the company from taking advantage of this position to impose abusive conditions on other market operators. Such conditions may involve abuse through exploitation of the opposing party (such as suppliers or customers) through abusive economic conditions and terms or exclusion, expulsion or impairment of the position of competitors in the market or through any other means.
- i) Analyze, prior to implementation, any transaction that may be considered a concentration (including, but not limited to, those that may significantly affect the maintenance of effective competition), in order to determine whether a transaction: (i) qualifies as a concentration; (ii) must be subject to prior notification to the competent authorities; or (iii) requires suspension of execution or implementation until clearance has been obtained from antitrust authorities in the relevant jurisdictions.
- j) Promote the use of the available communication channels, as provided for in the *Code of Conduct*, the *Compliance Policy* and the *Internal Whistleblower Information and Protection System* to report or denounce possible irregular conduct or potential illegal or unlawful acts. The Governance and Sustainability System may be used in anti-trust matters, which refer to or affect the scope of the activities of Group companies and/or their suppliers. Reports must be made to protect the interests and image of the Company.
- k) Encourage suppliers to comply with antitrust policies, rules and procedures implemented within the Group.
- l) Strengthen and develop a culture of compliance with antitrust laws and its decision to promote open and fair competition while reinforcing awareness among employees of the importance of this area. It is especially pertinent to involve members of the management team in this task, considering that it is a particularly rapidly changing area with significant implications for the daily activities of the Group's companies.
- m) Implement training programs and communication plans appropriate for the Group's employees on antitrust practices, which are effective and adapted to the specific business of each company, in order to promote greater awareness of the relevance and possible implications of this topic. At the same time, such programs must provide the necessary tools and knowledge to identify potential risks and mitigate them at a frequency that ensures their knowledge on the subject of this *Policy* is up

to date.

- n) Provide all assistance and cooperation that may be requested by antitrust authorities in the exercise of their functions and, in particular, in the investigation of any conduct that may constitute an infringement of antitrust law.

5. General provisions:

Infringements of antitrust law may result in serious penalties for the Group and its employees and/or representatives involved, whether directly or indirectly, with trade restraint practices. As a result, the practice of any act of trade restraint is punishable and will result in sanctions that may include termination of the employment or service contract or supply of materials, depending on the specific case, in addition to civil, administrative and criminal sanctions, as provided for by law.

6. Implementation and monitoring.

During the implementation and monitoring of the provisions of this *Policy*, the Company relies the collaboration of the Office of Secretary-General and the Board of Directors, which act in coordination with the respective departments, divisions and functions of the other companies of the Group. The Office develops the necessary rules and procedures to ensure the correct implementation of this *Policy*.

Situations involving non-compliance with this *Policy* must be reported using the Company's reporting channels as described in the *Internal Whistleblower Information and Protection System*.

[The Company and the remaining companies of the Group to which other policies, standards or principles are also applicable, whether of a sector nature or derived from the legislation of the territories in which they operate, must ensure such policies, standards or principles are consistent with the provisions of this *Policy*.]

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This *Policy* was initially approved by the Board of Directors on July 17th, 2023 and last modified on the October 16th, 2025.