

Basic Internal Audit Standard

Updated on October 16th, 2025

TITLE I. – THE STANDARD

Article 1 - Nature and scope of application

- 1. This Basic Internal Audit Standard (the "Basic Standard"), which is part of the Governance and Sustainability System of Neoenergia S.A. (the "Company") regulates, among other aspects, the nature, competencies, organization and attributions of the members of the Internal Audit function that correspond to the Internal Audit and Risks area of the Company.
- 2. The Basic Standard also establishes the normative references on internal audit that must inform the performance and development of guidelines that, in the exercise of their powers and under the protection of their autonomy, are carried out by the other companies of the Company, which, in any case, must respect the coordination criteria provided for in this Standard and in the Ethical, Governance and Sustainability Principles approved by the Company's Board of Directors.
- 3. The Internal Audit and Risks Board constitutes an internal unit of the Company, reporting hierarchically to the Board of Directors and functionally to the Audit Committee (the "Committee"). Its fundamental activity is to independently and proactively ensure the effectiveness of the governance, risk management and internal control processes within the Company and its subsidiaries

Article 2 – Approval, Modification and Prevalence

- In accordance with the provisions of the Rules of the Audit Committee, the Basic Standard and its amendments must be approved by the Board of Directors, upon proposal by the Committee.
- 2. Without prejudice to the foregoing, the Board of Directors may establish modifications to this Standard without a prior proposal from the Committee, within the scope of the reform of other standards of the Governance and Sustainability System.
- 3. This Basic Standard develops and complements the guidelines established in the *Regulations of the Audit Committee,* applicable to the Internal Audit and Risks Board, which prevail over the former in case of contradiction.



Article 3 – Interpretation

- 1. Any issues that may arise in relation to the interpretation and application of the Basic Standard must be resolved by the Director of the Company's Internal Audit and Risks area, who will take into account the provisions of the Governance and Sustainability System, the International Standard for the Professional Practice of Internal Auditing approved by the Institute of Internal Auditors (IIA), and other applicable standards. In case of controversy, the opinion of the Committee will be requested.
- 2. The Director of the Internal Audit and Risks area will inform the interpretative criteria of the Standard to the members of the Internal Audit and Risks Board of the other controlled companies; and to the Secretary of the Committee, who, in turn, will communicate them to the Secretary of the Company's Board of Directors.

Article 4 – Compliance

- 1. The members of the Internal Audit and Risks Board have the obligation to know and comply with this Basic Standard, which will be part of the Internal Audit and Risks management tools.
- 2. The Company's professionals have an obligation to know this Basic Standard and respect the provisions applicable to them, for which the Director of the Internal Audit and Risks area will ensure, where appropriate, its adequate disclosure and inform about its modifications.
- 3. The Director of the Internal Audit and Risks area will have the obligation to ensure compliance with this Basic Standard.

TITLE II. COMPETENCIES OF THE INTERNAL AUDIT AND RISK BOARD

Article 5 – Scope of Competencies

- 1. The Internal Audit and Risks Board will provide, independently and objectively, assurance and consulting services to add value and improve the Company's operations, providing a systematic and disciplined approach to assess and improve the effectiveness of risk management, control and governance processes within the Group.
- 2. In the exercise of its functions, as well as in the preparation of the annual plan of activities of the Internal Audit and Risks Board, as provided for in Article 11 of this Basic Standard, the competences regarding the assurance of other areas of the Company must be taken into account, so that the responsibilities of the Internal Audit and Risks



are clearly defined and there are adequate mechanisms for coordination with the other assurance functions.

- 3. The Internal Audit and Risk Board must be informed about the provision of assurance services to be carried out by external service providers.
- 4. In addition to the powers provided for in this Basic Standard, the Internal Audit and Risks Board will have others that are assigned by the Board of Directors or the Governance and Sustainability System.

Article 6 - Competencies in relation to the Audit Committee

- The Internal Audit and Risks Board assists the Committee in the development of its competencies, especially with regard to supervising the effectiveness of the internal control and risk management system, relations with the external auditor and supervising the process of preparing the Company's financial and non-financial information.
- 2. The Director of Internal Audit and Risks will be in charge of preparing the information the Committee needs. In addition, he will participate in the meetings to which he is called, when aspects that are within his respective scope of competence are discussed (among others, the meetings held at the time of the formulation or approval of annual or interim financial information and non-financial information).
 - In particular, the Director of Internal Audit and Risks will provide the Committee, without limitation and within its area of competence, with the necessary information so that it can: (i) supervise the effectiveness of the internal control and risk management systems, and (ii) conclude that the accounting policies have been applied correctly.
- 3. The Internal Audit and Risks Department will be the body of usual communication between the Committee and other areas of the Company, without prejudice to the provisions of the Internal Regulations of the Board of Directors and the Internal Regulations of the Audit Committee, with regard to the functions entrusted to the other areas, in particular, the Secretariat of the Board of Directors or other Executive Boards.



Article 7– Competence in relation to the internal control system

- 1. The Internal Audit and Risks Board will supervise, objectively and independently, the effectiveness of the internal control system established within the Group, composed of a set of risk management and control mechanisms and systems.
- 2. In particular, including, but not limited to, within the scope of their respective competencies, will be responsible for:
 - a) Oversee effective operation:
 - The risk control and management system implemented within the Group, as defined in the General Bases of Corporate Risk Management, and its adequacy to ensure compliance with risk guidelines and limits;
 - In order to ensure the independence and objectivity of the internal audit function, the assurance work to be carried out to evaluate the activities of the risk function will be carried out by independent professionals who will report their conclusions directly to the Audit Committee;
 - ii. The Internal Controls of Financial Information (SCIIF) and Non-Financial Information (SCIINF) systems established for the preparation and presentation of financial and non-financial information for all companies of the Company, including information that, due to its status as a publicly-held company, the Company must publish from time to time;
 - iii. The Company's Compliance system, which aims to prevent, manage and mitigate the risk of irregular conduct and unlawful acts or acts contrary to the law and the Governance and Sustainability System that may be committed within the organization;
 - iv. The mechanisms established for the implementation of Governance and Sustainability System policies.
 - b) Verify that the investment and divestment processes comply with the guidelines and risk limits applicable in each case, and that the procedures under which they are carried out ensure adequate internal control and effective management of associated risks.
- The Internal Audit and Risks Board must carry out any other actions that may be necessary for the development of its function to ensure the effective functioning of the internal control system.



TITLE III. ORGANIZATION OF THE INTERNAL AUDIT AND RISK AREA

Article 8 - The Director of Internal Audit and Risks

- 1. The Director of Internal Audit and Risks must have the knowledge, skills and experience appropriate to the functions he/she must perform, especially in matters of internal audit, risk management, internal control and governance;
- 2. As provided for in the Governance and Sustainability System, the appointment and dismissal of the Director of Internal Audit and Risks must be carried out by the Board of Directors, upon proposal by the Committee.
- 3. In general, the Director of Internal Audit and Risks will have the necessary powers to perform the functions he is called upon to perform;
- 4. The Director of Internal Audit and Risk will act transparently, informing those involved, whenever possible, of the purpose and scope of their actions;
- 5. The Committee is responsible for evaluating the operation of the Internal Audit and Risks area and the performance of its Director, in accordance with the provisions of the *Audit Committee Regulations*;
- 6. The Director of Internal Audit and Risks will manage the operation and budget of the Internal Audit and Risks Area under the principles of independence and efficiency in management, and will be responsible for the execution of the corresponding measures and action plans and for ensuring the proper fulfillment of its functions;
- 7. The Director of Internal Audit and Risks may seek the collaboration and advice of professionals, external or internal, in cases where it is considered necessary.

Article 9 – Coordination framework and information relations between the Company's Internal Audit and Risk area and the internal audit and risk departments of the Neoenergia Group companies

- 1. The Group's controlled companies have an internal audit function and risks, without prejudice to the particularities that may be applicable to them, if applicable, due to legislation or any other circumstances.
- The Company's Director of Internal Audit and Risks will establish an appropriate coordination and information relationship framework between the internal audit and risk departments of the controlled companies and develop the strategy, guidelines and overall oversight of the internal audit function at Group level.



3. The Director of Internal Audit and Risks and those responsible for the internal audit and risk areas of the other companies of the Company will hold periodic coordination and information meetings. These meetings may also have the participation of professionals that the Director of Internal Audit and Risks deems appropriate for the proper development of the function.

TITLE IV. RESOURCES, BUDGETS AND ANNUAL ACTIVITY PLAN

Article 10 – Material, human and technological resources

The Director of Internal Audit and Risks will have the human, financial and technological resources necessary for the performance of his duties, including the hiring or participation of specialists for those audits or jobs that require special qualifications to perform them.

Article 11 – Annual Plan of Activities and Budget

- 1. The Director of Internal Audit and Risks will prepare a proposal for the Annual Activity Plan of the Internal Audit and Risks Area in line with the strategic pillars of internal audit established at Group level and submit it for approval by the Committee. This proposal, in relation to the Internal Audit Function:
 - a) It will contain the budget of the Internal Audit and Risks area for the development of its activities during the following year;
 - b) Will consider key risk areas, both financial and non-financial (including reputational risks) and business;
 - c) Identify and clearly delimit the responsibilities of each corporate and business area for proper coordination with other assurance functions that may exist, such as control of financial and non-financial information, compliance and external audit;
 - d) Establish the audit objectives and the work to be carried out, as well as the resources necessary for its execution, both human (internal and external) and financial and technological; and
 - e) Will take into account suggestions made by the Board of Directors, the Committee and members of senior management
- 2. The Director of Internal Audit and Risks will carry out periodic reviews of its Activity Plan, in order to assess its adequacy to cover the identified risks and, if applicable, propose to the Committee, for its approval, the modifications it deems appropriate, and



will report on the execution of the plan under the terms provided for in paragraph 2 of article 12.

- 3. The Committee will assess compliance with the internal audit function's annual activity plan.
- 4. Once analyzed by the Committee, the Activity Plan and the budget of the Internal Audit and Risks Area will be forwarded for approval by the Company's Board of Directors.

Article 12 – Communication and Information

- The nature and scope of the consulting work that the Internal Audit and Risks area will
 carry out will be previously agreed with the Executive Board involved. In no case may
 the Internal Audit and Risks area assume managerial responsibilities or participate in
 executive decisions.
- 2. The Director of Internal Audit and Risks:
 - a) It will periodically report to the Committee and senior management on the implementation of the annual activity plan, including any impacts and limitations to the scope that may arise during its development, as well as the results and follow-up on recommendations.
 - b) It will submit to the Committee, at the end of each fiscal year, a report on the activities of the Internal Audit and Risk area, which must contain, at least, a summary of the activities and reports carried out during the year, explaining the work that, foreseen in the annual plan, was not carried out or that was not initially foreseen, as well as an inventory of the weaknesses, recommendations and action plans and the results of the Quality Assurance and Improvement Program,
 - c) It will periodically inform the Committee if the members of the Company's senior management take into account the conclusions and recommendations set forth in the reports issued by the Internal Audit and Risks area and will also inform about the cases in which they decide not to implement a critical or high risk recommendation, accepting the existing risk.
- The Director of Internal Audit and Risks will promote constant and fluid communication
 with the members of the Company's Senior Management, in order to ensure that they
 are aware of the competencies of the Internal Audit function and that they support it in
 achieving its objectives.



TITLE V. ACCESS TO INFORMATION AND DUTIES OF ITS MEMBERS

Article 13 – Access to information and collaboration

- The Internal Audit and Risks area, through its Officer or the person designated by it, will have access to the documentation, information or information systems it deems necessary or convenient for the exercise of its powers, complying in all cases with the legal provisions and internal regulations of the Company.
- 2. In the exercise of its powers, the Audit and Risks area may seek the collaboration of any member of the Company's team of directors or employee, as well as other specialized areas, both internal and external.

Article 14 - Duties

- 1. The members of the Internal Audit and Risk area must:
 - a) Act independently of the rest of the organization and perform its work in accordance with the *Global Internal Audit* Standards, including, in particular, the principles of ethics and professionalism, integrity, objectivity, competence, professional zeal and confidentiality.
 - b) Refrain from disclosing the information, data or reports to which you have access in the exercise of your position, as well as from using them for your own benefit or that of third parties, without prejudice to the applicable transparency and information obligations. This obligation of confidentiality remains even if they have ceased their duties.
- Professionals in the area of Internal Audit and Risks undertake to comply with the guidelines established in the *International Standard for the Professional Practice of Internal Audit* approved by the Institute of Internal Auditors (IIA), in addition to other legal and internal regulations applicable to them.

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This Basic Standard was initially approved by the Board of Directors on October 24th 2018 and last modified at the Board of Directors' Meeting on October 16th, 2025.