# **Innovation Policy**

Updated October 16th, 2025

The Board of Directors of NEOENERGIA S.A. (the "**Company**") has the power to prepare, evaluate and constantly review the Society's Governance and Sustainability System, as well as to approve and update the policies, which contain the guidelines that govern the Society's performance and they also inform, as applicable, the policies that, in the exercise of their autonomy, resolve to approve the companies that are part of the Group, whose dominant entity is, in the sense established by law, the Company ("**Group**").

In exercising these powers and within the scope of the legislation, the Society's Statute, and the *Purpose and Values* of the Neoenergia Group, as well as its sustainable development strategy, the Board of Directors approves this *Innovation Policy* (the "*Policy*"), which respects, develops and adapts, in relation to the Ethical and Basic Principles of Governance and Sustainability of the Neoenergia Group.

#### 1. Scope

This Policy applies to the Society. However, it informs the actions and regulatory developments that must be carried out by the other societies in the Group, subject to their competences and autonomy in this matter.

The content of this policy shall guide, when applicable, the performance of Neoenergia Institute, linked to the Group.

The Society will promote the alignment of the regulations of the societies in which it participates, but which are not part of the Group, as well as of *the joint ventures*, temporary associations of societies and other entities in which it assumes management, with the principles contained in this Policy.

# 2. Purpose

The purpose of this *Policy* is to establish the principles of action that should govern the definition and dissemination of the innovation strategy that allows the Group to continue leading the electricity sector, leading the transition towards a more electrified, sustainable and electric energy model.

The focus on innovation is a priority to promote sustainability, efficiency, competitiveness and keep the Society at the forefront of the development of new products, services and business models designed to transform the sector.

The Society sees innovation as an open and decentralized process, decentralized because it is carried out independently in each business unit, but in a coherent way with the support and coordination of the Innovation area; open, because the Society is a technology-driven Society and, as such, its vocation is to involve, in its innovation process, all its technology suppliers, including startups, universities, technology centers, and equipment manufacturers.

## 3. Principles of conduct

The Society assumes and promotes the following principles of conduct in respect of the innovation strategy:

- a) Lead energy efficiency-oriented innovation and enable higher electrification of demand.
- b) To foster Research, Development and Innovation (R+D+I) activities, focusing on efficiency aimed at the continuous optimization of the business operations developed by the Group's societies, management of the useful life of facilities and equipment, reduction of operation and maintenance costs and decrease in environmental impact, as well as the development of new products and services to meet the needs of the customers.
- c) To boost the digital transformation business developed by the Group's societies to improve the efficiency of its processes, the operation and maintenance of its assets and increment the availability of their generation business.
- d) To keep at the forefront of new technologies and disruptive business models, by fostering an "innovative culture" that permeates the entire organization and creates motivating work environments that permeates, favors and rewards the generation of ideas and innovative practices by professionals, accepting the implicit risk and recognizing creative contributions.
- e) Foster the creation of innovation ecosystems based on attracting external talent and exploring new forms of collaboration in order to gain knowledge and develop new solutions that create value in a sustainable way.
- f) Promote innovation by collaborating with startups, entrepreneurs and suppliers in order to develop new disruptive and sustainable business models and favor the interchange of knowledge and the impact produced by them.
- g) Foster collaboration and partnerships with the academic, intellectual and technological world, through bonds that allow innovative capacity and collaborate in the dissemination of knowledge.
- h) To obtain innovations that are supportive to sustainable growth and efficient management of resources and the reduction of environmental impacts, contributing to the social and economic development of the environment in which the Group's societies carry out its activities.
- i) Develop projects in the area of universalization of electrical services, based on environmentally sustainable, economically viable models.
- j) Integrate innovation in all of the Group's training content through specific courses and programs for the development of skills related to creativity.
- k) Implement an innovation management system that includes the setting of annual goals and objectives within a process of continuous improvement, managing the Society's human and intellectual capital as essential support for the entire creative and innovative process.

- I) To promote innovation in the technological, commercial, industrial, scientific, organizational or financial spheres, among others, encouraging fair competition between societies within the framework of a social market economy, which constitutes a key factor for sustainable development in the long term and, in particular, information or knowledge considered (or likely to be considered) as a business secret given the relevance of its protection, insofar as it grants a real or potential competitive advantage and, therefore, incorporates a relevant business value to the Group society holding the information or knowledge for the Society.
- m) To promote internal talent and stimulate creative thinking, developing a culture of innovation at all levels that facilitates the successful promotion of the challenge of incorporating new technologies.
- n) Promote a system of monitoring and technological prospecting that allows the identification of opportunities and challenges for the businesses and detects the need for innovation in processes or services aiming to anticipate technological changes and the market needs and risks.
- o) To internally disseminate the knowledge gained, so that professionals can be aware of the best practices applicable to their activity in the search for efficiency and effectiveness in the Society's processes.
- p) Protect the results of the innovation process byproperly and ethically the intellectual and industrial property, which, in any case, shall imply respect for the property rights of third parties.
- q) To enhance innovations that contribute with added value for users and increase the satisfaction of the Group's employees, shareholders, the financial market, customers and other Society's Interest Groups.

## 4. Implementation and monitoring

For the implementation and monitoring of the provisions of this Policy, the Board of Directors has the Innovation area, which will develop the necessary procedures for this.

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This Policy was initially approved by the Board of Directors on July 19, 2018 and last amended at the Board of Directors' Meeting held on October 16<sup>th</sup>, 2025.