

Policy for Trading with Securities Issued by Neoenergia S.A. and its Subsidiaries

April 23, 2019

I – DEFINITIONS AND PARTICIPATION

1. The definitions used in this Trading Policy have the meanings attributed to them in the Definitions Applicable to Policies for Trading with Securities Issued by Neoenergia S.A. and its Subsidiaries, which become part of this Trading Policy in the form of Annex I.
2. They must sign the Term of Adhesion to the Trading Policy, the model of which constitutes Annex II of this Trading Policy, becoming Related Persons for the purposes set out herein, the controlling shareholders and people indicated by them who access information on the use of the Company, its controlled and affiliated companies, as well as the members of the Board of Directors, the Fiscal Council and the Executive Board, and any bodies with technical or advisory functions created by statutory provision, employees and third parties hired by the Company who have permanent or occasional access to Relevant Information of the Company, Controlled and Affiliated Companies.
3. Still regarding Related Persons, the Company and its management have the prerogative to determine the execution of the Term of Adherence to the Trading Policy by other people, as the Company deems necessary and/or convenient, as they are linked to a certain operation, as decided by the area which is conducting such an operation, and it is the responsibility of this area to control the terms of membership of these people.
4. Related Persons must adhere to this Trading Policy by signing a specific term at the time of hiring, election, promotion or transfer, when they declare that they know the terms of this policy and that they are obliged to observe them.
 - 4.1. The respective adherence to this Trading Policy is the responsibility of the contracting board, and the adhesions made must be communicated by each board to the Board responsible for People Management, which will maintain an updated register and, if and when requested, will arrange for the information to be made available to the Investor Relations Board.
 - 4.2. For members of the Board of Directors, the Fiscal Council and any bodies with technical or advisory functions created by statutory provision, adherence to this Trading Policy is the responsibility of the Corporate Governance area.
5. The Company must maintain control of the Term of Adherence to the Trading Policy at the Company's headquarters, as long as the person maintains a relationship with it and for at least five years after their dismissal.
6. The Company will maintain at its headquarters a list of Related Persons and their respective qualifications, indicating position or function, address and registration number

of the National Register of Individuals ("CPF") and/or Legal Entities ("CNPJ"); if the shareholder lives abroad, the name or corporate name and the registration number in the Register of Individuals or the National Register of Legal Entities of their agent or legal representative in the country. The information must be updated whenever necessary, within a period of up to 05 (five) days from the date of the change.

II – PURPOSE

7. The purpose of this Trading Policy is to establish the rules that must be observed by Related Persons regarding the trading of Securities. The rules of this Trading Policy define periods in which Related Persons must refrain from trading with Securities, in order to avoid questions regarding the misuse of Relevant Information not disclosed to the public, ensuring transparency to all those interested in trading, without privileging some over others.
8. The Company's Trading Policy was prepared in accordance with the terms of CVM Instruction No. 358, of January 3, 2002, as amended, which must be observed by all Related Persons in conjunction with this Trading Policy.
9. Any doubts about the provisions of this Trading Policy, the applicable regulations issued by the CVM and/or about the possibility of carrying out or not a certain negotiation must be clarified with the Chief Financial and Investor Relations Officer.

III – PROHIBITIONS ON NEGOTIATION AND OBLIGATION TO PROVIDE INFORMATION

10. Prior to the disclosure to the public of Relevant Information, the negotiation, provision of recommendations or investment assistance in Securities by Related Persons who are aware of such Relevant Information is prohibited, even if through personal knowledge, and/or the date of its dissemination.
11. Related Persons who leave their positions, functions or roles in the Company's management prior to the disclosure of Relevant Information arising during their period of management or service at the Company will not be able to trade in Securities until (i) the end of the period of 6 (six) months from the date of their removal or (ii) the disclosure to the public of the Relevant Information.
12. The prohibitions of this Trading Policy include negotiations carried out directly and/or indirectly by Related Persons, excluding those carried out by investment funds in which the Related Persons are shareholders, as long as they are not exclusive investment funds or investment funds whose decisions to trading by the administrator or portfolio manager are directly influenced by Related Persons.
13. Related Persons must ensure that those with whom they maintain a commercial, professional or trust relationship do not trade Securities when they have access to undisclosed Relevant Information. To this end, the Related Persons will make their best

efforts to ensure that everyone who accesses Relevant Information signs the Term of Adhesion.

14. Related Persons must adopt all necessary measures so that the prohibitions contained in this Chapter are extended to Bound Persons.
15. Whenever there is an ongoing process of acquisition or sale of shares issued by the Company by a Bound Person, which is public knowledge, and whenever an agreement or contract has been signed to transfer the share control of the Company, or if an option or contract has been granted mandate for the same purposes, as well as if there is the intention to promote incorporation, total or partial spin-off, merger, transformation or corporate reorganization of the Company, trading in Securities by Related Persons will be prohibited.
16. The prohibitions for trading in Securities must be observed by Related Persons until the Relevant Information is disclosed to the public. However, such prohibitions will be maintained, even after the disclosure of the Relevant Information, in the event that any negotiations with Securities by Related Persons may interfere, to the detriment of the Company or its shareholders, with the act or fact associated with the Relevant Information.
17. Related Persons may have their own plans for trading securities issued by the Company, which will be submitted for analysis by the Investor Relations Officer and filed at the Company's headquarters.
18. The Investment Plan will only be approved by the Company if its content prevents the use of Relevant Information based on privileged information, and must, therefore, be prepared in such a way that the decision to buy or sell cannot be taken after knowing the information, the person holding the aforementioned Plan refrains from exercising influence over the operation pending relevant information that has not been disclosed.
19. The Investment Plan must present the nature of the scheduled operations, both purchase and sale, as well as the dates, quantities and prices or a pre-determined criterion for defining these elements compatible with the provisions contained in this Policy, and Related Persons must communicate their plans for periodic trading of securities to the Stock Exchange or Market Entities.

IV – PROCEDURES FOR COMMUNICATION OF INFORMATION ON TRADING IN SECURITIES

20. The Controlling Shareholders, Members of the Board of Directors, Directors, Members of the Fiscal Council, or any of the members of the other Bodies with Technical or Advisory Functions of the Company that exist as a result of the provision in the latter's Bylaws and other people affected by this Policy must inform, through the Financial and Investor Relations Officer, on the first business day after taking office, as the case may be, the ownership of Securities issued by the Company or issued by its Controlling Companies or Subsidiaries (as long as they are Open Companies), including through derivatives or any other securities referenced in the Securities, whether in one's own name or in the name of Related Persons, as well as negotiations carried out with these Securities.
21. The communication referred to in this Section must also cover negotiations with derivatives or any other Securities referenced in securities issued by the Company or issued by its Controlling Companies or Subsidiaries (as long as they are Open Companies). They must forward the communication referred to in this Section to the Chief Financial and Investor Relations Officer (i) on the first business day after taking office and (ii) within a maximum period of 5 (five) days after carrying out each trade, indicating the position balance before and after the negotiation, as per Annex III.
22. The communication referred to in this Section must be made in accordance with Annex II of this Policy and forwarded to the Investor Relations area.
23. The communication to be made by the Chief Financial and Investor Relations Officer to the CVM must be made (i) in the first case, immediately after receiving the communication from any of the persons obliged under the terms of this Section and (ii) in the second case, within a maximum period of 10 (ten) days after the end of the month in which there is a change in the positions held, indicating the balance of the position in the period and observing the provisions set out in article 11 of CVM Instruction No. 358/02.
24. In the absence of any of the people required to provide due information, under the terms of this Section, with their obligation to communicate position in Securities, the responsibility of the Chief Financial and Investor Relations Officer for the lack of communication does not arise.

V – NON NEGOTIATION PERIOD

25. The trading of Securities Issued by the Company by Persons Subject to the Trading Policy or Persons linked to them is prohibited in the following periods:
 - In the 15 days prior to the release of the Company's quarterly (ITR) and annual (DFP) information;

- When they have access to Relevant Information not yet disclosed to the market through the CVM and Stock Exchange;
- When the acquisition or sale of Shares by the Company itself is in progress;
- When there is an intention to promote a merger, incorporation, total or partial spin-off, transformation or corporate reorganization involving the Company;
- After termination of the employment or service provision contract, until the relevant information is public; and
- In other periods determined by CVM Instruction No. 358/02.

VI - GENERAL PROVISIONS

26. Upon signing/accepting the Term of Adhesion, the Related Persons must inform the Company, through the Chief Financial and Investor Relations Officer, of their trading and investment intentions in relation to the Securities, being obliged to immediately communicate any change in the plans that have been reported.
27. The Company may establish non-trading periods for Securities additional to those provided for in this Trading Policy, applicable to Related Persons, and must immediately notify the Related Persons.
28. Trading in Securities by Related Persons during non-trading periods, as provided for in this Trading Policy, may be exceptionally authorized by the Company's Management, upon request presented in writing containing the justification for the need for trading.
29. The rules set out in this Policy apply to (i) trades made in Market Entities, whether organized or not, as well as trades made without the intervention of an institution that is part of the distribution system; and (ii) Securities lending operations carried out by Related Persons.

VII – NON-COMPLIANCE WITH TRADING POLICY

30. Communication of non-compliance with the Policy for Trading Securities Issued by Neoenergia S.A. and its Subsidiaries must be made to the reporting channel or directly to the Compliance Superintendency.

VIII – OBLIGATION TO COMPENSATE

31. The Related Persons responsible for non-compliance with any provision contained in this Trading Policy will reimburse the Company and/or other Related Persons, in full and without limitation, for all losses that the Company and/or other Related Persons may incur and that arise as a result, directly or indirectly, of such non-compliance.

IX - APPROVAL

32. This Trading Policy was approved by the Board of Directors on April 23, 2019, with effectiveness conditioned on the publication of the announcement of the beginning of the public offering of secondary distribution of common shares issued by the Company, remaining in force for an indefinite period, until there is a decision to the contrary. Any change to the Policy for Disclosure that may be approved must be communicated to the CVM and the Stock Exchanges.

ANNEX I

DEFINITIONS APPLICABLE TO THE POLICY FOR TRADING WITH SECURITIES ISSUED BY NEOENERGIA S.A.

CONTROLLING SHAREHOLDERS OR CONTROLLER - shareholder or group of shareholders linked by a shareholders' agreement or under common control that exercises the power to control the Company, under the terms of Law No. 6.404/76.

EXTERNAL ADVISORS – persons who are not considered as employees and provide financial, legal, consultancy, auditing or any other type of services to any Company, in their own name or in the name of another, and who, due to such provision of services, have access to Relevant Information.

STOCK EXCHANGES - B3 S.A. - Brasil, Bolsa, Balcão, or B3, and any other stock exchanges or organized trading markets in which the Company has Securities admitted for trading.

COMPANY - Neoenergia S.A. and its Subsidiaries.

SUBSIDIARIES – Companies under the control of Neoenergia

AFFILIATES – Companies that belong to the economic group of the Company, directly or indirectly.

CVM - Securities and Exchange Commission.

CHIEF FINANCIAL AND INVESTOR RELATIONS OFFICER - Director of the Company, designated in the Shareholders' Agreement to exercise the duties provided for in CVM regulations.

MARKET ENTITIES - combination of stock exchanges or organized over-the-counter market entities, in which the Securities issued by the Company are or will be admitted to trading, as well as equivalent entities in other countries.

RELEVANT INFORMATION - any decision of shareholders, resolution of a general meeting or of the Company's management bodies or any other act or fact of a political-administrative, technical, business or economic-financial nature occurring in or related to the Company's business, which may have a considerable influence on: (i) in the quotation of Securities; (ii) in investors' decision to buy, sell or hold the Securities; or (iii) in determining whether investors exercise any rights inherent to the condition of holders of Securities. An exemplary list of situations that may constitute Relevant Information can be found in article 2 of CVM Instruction 358/02.

RELATED PERSONS - The Company, its controlling shareholders, direct and indirect, and the people indicated by them to access information about the Company, directors, members of the board of directors, the fiscal council and any other bodies with technical or advisory functions created by statutory provision, employees and third parties hired by the Company, companies

controlled and/or under common control and their respective controlling shareholders, members of management and bodies with technical or advisory functions created by statutory provision, employees and third parties hired by the Company, who have expressly adhered to the Policy for Disclosure and/or the Trading Policy and are obliged to comply with the rules described therein.

BOUND PERSONS - Bound Persons are considered to be: (i) spouse who is not judicially or extrajudicially separated, (ii) partner, (iii) any dependent included in their annual income tax adjustment declaration, and (iv) first degree ascendants and descendants.

POLICY FOR DISCLOSURE - Policy for Disclosure of Relevant Information and Preservation of Confidentiality of Neoenergia S.A. and its Subsidiaries.

TERM OF ADHESION - formal instrument signed by Related Persons and recognized by the Company, through which awareness of the rules contained in the Policy for Disclosure, Policy for Trading and CVM Instruction 358/02 is expressed.

SECURITIES - For the purposes of this Policy, securities are all those defined in accordance with article 2 of Law 6.385/76, as amended by Law 10.303/01: I. shares, debentures and subscription warrant; II - coupons, rights, subscription receipts and split certificates relating to the securities referred to in section I; III - securities deposit certificates; IV - debenture notes; V - shares of investment funds in securities or investment clubs in any assets, observing, in this case, the exception of item "8."; VI - commercial notes; VII - futures contracts, options and other derivatives, whose underlying assets are securities; VIII - other derivative contracts, regardless of the underlying assets; and IX - when publicly offered, by the Company, its controlled companies and affiliates, any other securities or collective investment contracts, which generate the right to participation, partnership or remuneration, including resulting from the provision of services, whose income comes from the entrepreneur's efforts or third parties.

ANNEX II

TERM OF ADHESION TO THE NEOENERGIA S.A. TRADING POLICY

I, [name], [qualification], resident and domiciled in the City of [], State of [], at [address], enrolled with the CPF/MF under number [] and bearer of the identity card no. [], issued by [], as [position, function or role] of Neoenergia S.A., declare that I have become fully aware of the terms and conditions of the Trading Policy of Neoenergia S.A. and its Subsidiaries, in accordance with the terms and conditions of CVM Instruction no. 358, of January 3, 2002, as amended, approved by the Company's Board of Directors at a meeting held on April 23, 2019, and by this Term of Adhesion I formalize my adherence to the Policy for Trading of Neoenergia S.A. and its Subsidiaries, committing to comply with all its terms and conditions.

[City], [date]

[Name]

[Job, Function or Role]

ANNEX III

ACQUISITION OR DISPOSAL OF INTEREST IN SECURITIES

I [name], [marital status], [profession], bearer of the identity card number _____, issued by _____ and registered with the CPF/MF under number _____, resident and domiciled at _____, in City _____, State _____, in the quality of _____ [indicate the position, function or relationship with the Company] of [Company Name], DECLARE, in compliance with the provisions of Instruction No. 358/02 of the Securities and Exchange Commission that I [acquired/disposed of] [quantity] [specify Securities] having changed my participation in Securities of (Company Name) to ___% (as long as they are publicly-held companies), or Securities referenced to them, as below:

Period [month/year]	
Deal Date	
Issuing Company	
Type of Security	
Total Amount	
Quantity by Type and Class	
Price	
Brokerage Firm Used	
Other Relevant Information	

Pursuant to Instruction No. 358/02 of the Securities and Exchange Commission, I further DECLARE that I will communicate to the Chief Financial and Investor Relations Officer of (Company Name) any change in the information provided herein, by the 5th of each month.

[place and date]

[Name of the Declarant]

[Role]