Policy for Transaction with Related Parties

Updated on October 16th, 2025

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, as well as its Sustainable Development Strategy, the Board of Directors hereby approves this Related Party Transaction Policy ("**the Policy**"). This Policy will respect, develop and adapt, in relation to the Company, the Neoenergia Group's Core Ethical Principles of Governance and Sustainability.

1. Scope

This Policy is applicable to the Company. Nevertheless, this Policy describes the actions and regulatory developments that must be carried out by the other companies of the Group while observing their competencies and autonomy.

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.

2. Purpose

The purpose of this Policy is to establish rules aimed at ensuring that decisions involving transactions made between related parties and situations posing a potential conflict of interest are adopted through a transparent process and always in the best interests of the Company, as well as in compliance with best corporate governance practices.

3. Definition of related party transactions

Related party transactions are considered to constitute the transfer of resources, services or obligations between the Company and a related party, regardless of whether a price is charged in return ("Related Party Transactions").

4. Definition of related parties

The partners, holders of ownership units or shareholders (whether directly or indirectly) at shareholders, themselves, as well as their affiliates ("Related Parties"), are considered to be related parties of the Company. For the purposes of this Policy, an affiliate means, in relation to any person, individual or legal entity that is a parent or controlled company, is under common control or: (i) a company that is controlled; or (ii) an investment fund in which the majority of the shares is held; whether directly or indirectly, by the same final controller(s) at such an entity.

For the purposes of this Policy, control means the holding of voting rights that permanently ensure preference in corporate resolutions and the power to elect the majority of the managers of a given legal entity, whether in isolation or through a control block regulated by a shareholders' or a partners' agreement.

The Company's internal department responsible for a given transcation with a potential Related Party will informat the Governance Secretariat, which, in turn, will bring the matter at hand the Company's Executive Board. The Board will then forwards it to the Related Party Transactions Committee, when applicable. The Related Party Transactions Committee is responsible for identifying Related Parties and classifying Related Party Transactions.

5. Definition of situations involving a conflict of interest among shareholders, members of the Board of Directors or the Board of Directors' Advisory Committee

A conflict of interest arises whenever a shareholder, member of the Board of Directors or the Board of Directors' Advisory Committee ("the **Committee**") is involved in a decision-making or advisory process in which may result in personal gain or gain for any family member, or for a third party with whom they are involved. Such cases may interfere with this person's ability to make neutral judgments in any case, provided that such an act is carried out to the detriment of the interests of the Company. In cases involving the Company, situations involving conflicts of interest may also be considered to be those in which the personal objectives of decision makers, for any reason, are not aligned with the Company's objectives in specific matters.

Given the potential conflict of interest that exists in such situations, the Company seeks to ensure that all decisions or recommendations that may confer a private benefit to any of its shareholders, members of the Board of Directors, members of the Committees, family members, their investees or related persons are made with total transparency.

6. Rules for decisions involving related parties or other potential conflicts of interest

Upon identifying a matter of this nature, the shareholders, members of the Board of Directors or Committees must immediately provide notice of their conflict of interest at a Meeting of the Shareholders, the Board of Directors, or of any Committee. The respective potential conflict of interest must be included in meeting minutes. Additionally, they must abstain from discussions on the subject and refrain from decision-making or issuing an opinion, depending on the specific case.

At the request of the Chair of the Board of Directors or Chair of the corresponding Committee, depending on the specific case, such shareholders, members of the Board of Directors or Committees may partially participate in discussions in order to provide further information on the transaction and the parties involved. In such cases, these individuals must be absent from decision making or the issuance of an opinion, depending on the specific case.

In the event that any shareholder, member of the Board of Directors or Committee, who may receive a potential private gain arising from any decision or opinion, does not provide notice of such a conflict of interest, any other shareholder or member of the body to which they belongs aware of the situation may do so. In such cases, the presence of a conflict of interest will be determined by the Board of Directors or the respective Committee and, if verified, such a lack of voluntary manifestation of the shareholder, member of the Board of Directors or Committee will be considered a violation of this Policy and subject to corrective action determined by the Board of Directors.

Manifestation regarding conflicts of interest and their subsequent abstaining from participation in processes must be included in meeting minutes. Upon being vested into their position, the members of the Company's Board of Directors and Committees must sign a document stating that they have received, read and will seek to follow this Policy and other provisions involving conflicts of interest.

The Company's Officers are subject to rules for conflicts of interest and related party transactions provided for in the Procedure for Conflicts of Interest and Related Operations with Officers and Employees Directly Dependent on the Board of Directors.

7. Formalization of Transactions with Related Parties

Related Party Transactions within the scope of the Board of Directors will be analyzed by the Related Party Transactions Committee, which must ensure the following conditions are observed:

- (a) Related Party Transactions must be carried out in accordance with market standards (conditions equivalent to those that would be negotiated with independent third parties); and
- (b) Loans provided in favor of the controller, if applicable, and management will not be permitted, except with a favorable opinion from the Related Parties Committee.

Except in cases in which transactions are considered Linked Transactions under the Procedure for Conflicts of Interest and Related Operations with Officers and Employees

Directly Dependent on the Board of Directors, Related Party Transactions will be resolved by the Board of Directors, pursuant to the Company's Articles of Incorporation. Resolutions must take the opinion issued by the Related Party Transactions Committee on the transaction in question into account.

The following processes will therefore be subject to the approval of the Company's Board of Directors: (i) the provision of guarantees on the part of the Company in favor of its subsidiaries and affiliates, (a) with a total value greater than \$500,000,000.00 (five hundred million reals) as part of loan transactions, debentures or financial operations, including Company derivatives or (b) with a total value greater than \$50,000,000.00 (fifty million reals) for remaining transactions; and (ii) the negotiation, execution or amendment of a contract of any kind or value between the Company and its shareholders, whether directly or through interposed companies or, additionally, companies in which they hold a direct or indirect ownership interest.

The provision of the following guarantees by the Company in favor of its subsidiaries and affiliates will in turn be subject to the approval of the Executive Board, as a permanent body: (a) transactions with a total value of up to \$500,000,000.00 (five hundred million reals), for loans, debentures or financial transactions, including Company derivatives or (b) with a total value of up to \$50,000,000.00 (fifty million reals) for remaining transactions.

8. Disclosure

Under the terms of current legislation, the Company must disclose transactions with related parties, the type of relationship and transaction carried out between parties. It must provide sufficient details to identify the related parties and any essential and not strictly transactional conditions inherent to the transactions in question.

This information will be disclosed (i) in explanatory notes to the Company's financial statements, in accordance with the applicable accounting regulations, after an opinion is provided the Company's Audit Committee; and (ii) the Reference Form to be forwarded to the Brazilian Securities and Exchange Commission – CVM, pursuant to item 16 of Annex 24 of CVM Guidance 480/09.

9. Responsibilities for Policy approvals and updates

As provided for in the Company's Articles of Incorporation, the Audit Commission is responsible for evaluating, monitoring and recommending the correction or improvements to this Policy to the Company's Board of Directors. For these purposes, the Audit Commissions shall rely on the assistance of the Related Party Transactions Committee.

10. Implementation and Monitoring

As part of the implementation and monitoring of the provisions of this Policy, the Board of Directors relies on the Financial and Investor Relations Board, which will ensure its correct performance.

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This Policy was approved by the Board of Directors on June 4, 2019, and last modified at the Board of Directors' Meeting held on October 16^{th} 2025.