

Policy on the Development and Responsible Use of Artificial Intelligence Tools

Approved 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 the legislation, the Company's Bylaws and the Purpose and Values of the Neoenergia Group, as well as its Innovation and Digital Transformation Strategy aimed at creating sustainable value, the Board of Directors approves this Policy for the *Development and Responsible Use of Artificial Intelligence Tools* (the "**Policy**"), which respects, develops and adapts, in relation to the Company, the Ethics and Basic Principles of Governance and Sustainability of the Neoenergia Group.

This Policy, in line with the Recommendation of the Council of the Organization for Economic Cooperation and Development ("OECD") on artificial intelligence, is an expression of the Company's understanding of the relevance of the development and implementation of artificial intelligence tools for the application of said strategy, and the importance of ensuring their responsible use, in accordance with the Company's corporate ideology and the principles that guide its corporate culture, based on ethics and commitment to sustainable development.

1. Scope of application

This Policy is applicable to the Company. Nevertheless, it informs the actions and normative developments that must be carried out by the other companies of the Group, observing their competences and their autonomy in this matter.

The content of this policy must also offer guidance, when applicable, for the performance of the Neoenergia Institute, which is linked to the Group.

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

Finally, the principles set forth in this Policy will also apply to suppliers who develop artificial intelligence tools for the Company or for the entities subject to this Policy, in everything they do.

2. Purpose

The purpose of this Policy is to establish the principles and guidelines of action that should govern the design, development and application of artificial intelligence tools, understood as any automated system designed to work with different levels of autonomy and that can, with explicit or implicit objective, generate results such as predictions, recommendations or decisions that, in turn, influence physical or virtual environments. It also aims to regulate the responsible use of these tools, ensuring compliance with the applicable legislation and the Purpose and Values of the Neoenergia Group, the Code of Conduct for Managers, Professionals and Suppliers and the other standards that are part of the Company's Governance and Sustainability System.

In this sense, this Policy establishes the principles and guidelines to ensure the responsible, transparent, safe and reliable use of artificial intelligence systems and algorithms by the Company and other Group companies.

3. General principles of action:

In order to fulfill the commitment indicated in "Purpose", the design, development, application and use of artificial intelligence tools by the companies to which this Policy applies, must be carried out in accordance with the following principles of action:

a) Principle of respect for human beings and social well-being

Artificial intelligence systems are developed and used as tools in the service of people, with full respect for human dignity and the environment, according to the state of technology at all times and in a way that benefits all human beings, ensuring that their development contributes to the fulfillment of the Sustainable Development Goals (SDGs) approved by the United Nations (UN).

The responsible use of artificial intelligence tools is ensured, in accordance with the Neoenergia Group's commitment to human rights and with the principles that form the Purpose and Values of the Neoenergia Group and the Code of Conduct for Administrators, Professionals and Suppliers, in order to facilitate that their design and use can be controlled and supervised by humans. In any case, particular attention is paid

to ensuring that artificial intelligence systems do not harm health and safety or have negative repercussions on people's fundamental rights.

b) Principle of diversity, non-discrimination and equity

Ensure the development and use of artificial intelligence systems in order to promote equal access, gender equality and cultural diversity, while avoiding prejudices with discriminatory effects (based on race, ethnic origin, religion, sex, sexual orientation, disability or any other condition of people).

c) Principle of “innovative culture”

It ensures that the design, development and application of artificial intelligence tools are aligned with the Group's innovation strategy, to remain at the forefront of new technologies and disruptive business models, fostering an "innovative culture" that permeates the entire organization and promotes motivating work environments that favor and reward the generation of innovative ideas and practices.

d) Principle of privacy

Ensure that artificial intelligence systems are developed and used in accordance with current privacy and data protection legislation, as well as the Governance and Sustainability System, and process data that meets established quality and integrity criteria.

e) Principle of transparency

Artificial intelligence systems are developed and used in such a way as to allow adequate traceability and transparency, ensuring that users are aware that they are communicating or interacting with an artificial intelligence system, duly informing affected people about the capabilities and limitations of said system, as well as the rights that protect them.

f) Principle of safety and resilience

Ensure that artificial intelligence systems are developed and used in a way that minimizes unintended and unexpected damage and are resilient to attempts at unauthorized access, alteration of their use or performance, and illicit use by third parties, ensuring, at all times, continuity in the provision of services.

Artificial intelligence systems have physical, technical and logical security systems and mechanisms to protect them and to ensure their correct functioning against any

alteration, misuse or unauthorized access (whether physical or cyber), as well as to guarantee the integrity of the data stored or transmitted through them.

In general, and without prejudice to the exceptions that may be established for justified reasons by the Digital Transformation Board (or by the board that assumes its functions in this subject), artificial intelligence systems that are in accordance with established criteria in force will be developed or used.

g) Principle of training and awareness

Creators of artificial intelligence tools are assured training on the aspects necessary to understand the risks implied in the use of corporate systems/tools, approved by Neoenergia, behavioral aspects and best security practices, so that the end user of artificial intelligence tools can use them safely.

4. Instruments and coordination of digital transformation and use of artificial intelligence

To achieve the stated objectives, the Company has the Digital Transformation Board (or the department that, at a given time, assumes its functions), which acts with the Security, Resilience and Digital Technologies Commission. You can also create an Artificial Intelligence Coordination Group to develop the necessary procedures and ensure the correct use of artificial intelligence and the management of potential risks arising from its use. This Group will act in coordination with the groups that, if applicable, are created by the Group companies.

5. Supervision

The Digital Transformation Board (or the department that assumes its functions) is responsible for monitoring compliance with the provisions of this Policy and reporting to the Audit Committee, as well as defining the procedures necessary for its performance.

Likewise, the Digital Transformation Board (or the department that, at any given time, assumes its functions), will review this Policy at least once a year, in order to ensure that its content is adequate to the constant advances, innovations, risks and regulations that occur in the subject.

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This Policy was initially approved by the Board of Directors on July 19, 2022 and last reviewed and updated on October 16th, 2025.