

Stakeholder Relations Policy

Updated February 07, 2024

The Board of Directors of NEOENERGIA S.A. (the “**Society**”) is vested with the powers to prepare, assess and review the Society’s Governance and Sustainability System on an on-going basis and, specifically, to approve and update, the corporate policies, which contain the guidelines governing the conduct of the Society and of the companies that comprise the group, for which the Society is the controlling entity, within the meaning established by law (the “**Neoenergia Group**” or the “**Group**”).

The *Bylaws, Purpose and Values of the Neoenergia Group, Sustainable Development General Policy* and further corporate policies express the Society's guidance for the creation of sustainable value shared with its shareholders and taking into account the other Interest Groups related to its business activity and its institutional reality, considering the commitments assumed in the Code of Ethics.

The Society understands that it is not possible to achieve social interest and develop a responsible and sustainable business model, without the strong involvement of the Society’s Stakeholders in its project, which are defined as those collective groups and entities that, with their decisions and opinions, influence the Society and, at the same time, are affected by its activities.

The Group is committed to ensuring that all its Stakeholders have a share in the social dividend produced by its activities (the “Social Dividend”), either directly or in collaboration with the Neoenergia Institute linked to the Group, understood as the creation of value that its activities materialize, specifically through: the involvement in the business communities in which the Society participates and leads, both from an economic point of view and from the perspective of business ethics; promoting diversity, equality and inclusion; strengthening the feeling of belonging and fairness; promoting innovation; care for the environment; the creation of quality jobs that ensure equal opportunities and non-discrimination in people management; and leadership in the fight against climate change.

The aforementioned Social Dividend contemplates the direct and indirect positive impacts in the economic, social and environmental spheres of the Society's activities, considering the expectations of all its Interest Groups and the Group's contribution to achieving the Sustainable Development Goals (“SDGs”) approved by the United Nations (“UN”).

Society's Stakeholders play a leading role in its corporate reputation, which is understood as the set of perceptions that they have about a company, capable of determining investment decisions, hiring and image before Stakeholders, in a way that directly affects its sustainability in the long term.

In line with the foregoing, one of the basic principles of *Reputational Risk Policy* is the proactive management of Society’s Stakeholders in order to integrate their expectations into the management of the Group's companies and mitigate the associated risks, through the *Global Model of Stakeholder Relations of Neoenergia Group* (the “Global Relations Model”).

Proper management of Stakeholders contributes decisively to the achievement of the purpose of the *Human Rights Respect Policy*, which formalizes the Group's companies commitment to human rights recognized in national legislation, as well as defines the general principles that shall be applied within the Group's perimeter to the due diligence in matters of human rights.

In exercising these powers and aware that the excellent management of processes and resources of the Group societies is a critical lever for the sustainable creation of value for all its Stakeholders and to comply with the provisions of the *Purpose and Values of Neoenergia Group*, the Board of Directors approves this *Stakeholder Relations Policy* (the "Policy").

1. Purpose

The purpose of this *Policy* is to establish the general framing for the Group companies' relations with their respective Stakeholders within the framework of their activities and operations in order to:

- (i) continue promoting the involvement of Stakeholders in the business project of the respective company, through a strategy of strong involvement with the communities in which it operates and the creation of sustainable value shared for all;
- ii) continued response to the legitimate interests of the Stakeholders with whom the Group's companies interact;
- iii) continued generation of trust among the Stakeholders, in order to build close, long-lasting, stable and robust relationships;
- d) encourage the recognition, by all its Stakeholders, of the Group companies' commitment to diversity in a broad sense and, particularly, in everything that concerns the professional development of their human team; and
- e) contribute to the whole and preserve the corporate reputation of the different locations and businesses in which the Group's companies develop their activity.

Notwithstanding, the Society's Board of Directors may approve corporate policies targeted to specific Stakeholders.

2. Scope

Within the limits established by law, this Policy is applicable to all societies comprising the Group and investees not comprising the Group, over which the Society has management influence.

For investees to which this Policy is not applicable, the Society shall promote, through its representatives on the management bodies of such companies, the alignment of their own policies with those of the Society.

This Policy shall also apply, as appropriate, to the joint ventures, temporary joint ventures and other equivalent associations, when the Society is responsible for the management thereof.

3. Society's Stakeholders

The value chain defined by the activities developed by Society causes the Stakeholders to be numerous; for this reason, for the purposes of this *Policy*, Stakeholders are grouped into the following categories:

- a) Neoenergia's People;
- b) Shareholders and the financial community;
- c) Customers;
- d) Communities;
- e) Supply chain; and
- f) Environment.

These Stakeholders are subdivided, in turn, into other categories, the Sub-Stakeholders, integrated by different collective groups and entities, which allows the management of relations to be adapted to the specific realities, needs and expectations to the locations or, in many cases, the facilities of the Group's companies.

4. Basic Principles:

The Group's companies assume and promote the following basic principles to involve and establish relations of trust with their respective Stakeholders.

- a) Responsibility:** Act on a responsible basis and build relations based on ethics, integrity, sustainable development, respect for human rights and communities affected by the different activities of the Group's companies;
- b) Transparency:** Ensure transparency in financial and non-financial relations and communication, sharing truthful, relevant, complete, clear and useful information;
- c) Active Listening:** Practice active listening, promoting affective bidirectional communication and direct, constructive, diverse, inclusive and intercultural dialogue;
- d) Participation and involvement:** Encourage the participation and involvement of Stakeholders in the activities of the respective Group company, by promoting cultural, voluntary initiatives and interaction channels, in compliance with the laws of each location, especially in the planning, construction, operation of the Group companies' energy projects;
- e) Consensus:** Work in line and in consensus with Stakeholders, especially with local and indigenous communities, taking into account their points of view;
- f) Collaboration:** Encourage collaboration with Stakeholders, aiming to contribute to the fulfillment of the *Purpose and Values* of the Neoenergia Group and, consequently, the *SDGs*; and
- g) Continuous Improvement:** Pursue continuous improvement, by periodically reviewing the Global Relations Model to ensure the response, in the most efficient way possible, to the needs of each moment.

The previous principles are completed with the provisions of the regulations and the Governance and Sustainability System.

The Society will establish communication channels to promote the above basic principles and include the participation of Stakeholders in its activity, as well as to reinforce the involvement and identification of Interest Groups with the Society. These channels may be of a general nature, such as the corporate website, social networks, digital media and applications and consultation procedures, or of a specific nature, that is, for interaction with a specific Interest Group.

5. Responsibilities in the management of Stakeholder relations

The Society's Board of Directors is vested with powers to approve and apply this *Policy* and to design, approve and supervise the general strategy for relations with the Group's societies' Stakeholders, ensuring their adequate coordination within the Group.

Thus, the Society's Executive Office encourages and coordinates the actions necessary to comply with this *Policy* and the *Global Relations Model*, promoting best practices in this area.

According to the Group's organizational structure, the subsidiaries, within the scope of their roles, are responsible for implementing the strategy related to relations with their Stakeholders and the *Global Relations Model*. The subsidiaries maintain direct contact and dialogue with their different Stakeholders, especially those operating in the surroundings of the Group's business locations.

The Group's subsidiaries may order the Neoenergia Institute, with which they have agreements, to implement activities of general interest and sustainable development previously defined by Neoenergia and the Group's subsidiaries, which will contribute to improving relations and dialogue with Stakeholders, without prejudice to the autonomy and independence of action that Neoenergia Institute maintains to achieve its purpose.

6. Global model of Stakeholder relations

It gathers the principles and provides the guidelines to, on the one hand, ensure that relations with the Stakeholders are implemented on a uniform basis, respecting the singularities of each region and business, and on the other hand, establish the necessary mechanisms to ensure that the Stakeholders have sufficient conditions to relate to the Group's societies.

Main characteristics:

- a) Guide the implementation of the breakdown of the Stakeholders, the identification of Sub-Stakeholders and the prioritization of the latter, according to the impact and the influence ability of the Neoenergia Group companies as whole in the subgroups, as well as these Stakeholders in the Neoenergia Group;
- b) Ensure that the Stakeholders have sufficient conditions to communicate with the respective Group company through the periodic assessment of the available channels and their characteristics (numbers, typography and frequency of use). The channels are constantly being updated to adapt to the needs and realities of each moment and to maximize their effectiveness in establishing close, lasting, stable and robust relationships;;

- c) Provide the identification and prioritization of the relevant issues (needs and expectations) for each Stakeholder, as well as identify and manage the impacts, risks and opportunities associated with these relevant issues, relating them to the Group's contribution to the achievement of the *SDGs*. In this case of risks, the management will depend on its assessment in terms of probability, severity and existence of associated reputational risks;
- d) Contain the main guidelines for designing and monitoring action plans that, on one hand, provide a response to the relevant issues for the Stakeholders due to the valuation of their risks and opportunities and, on the other hand, improve communication and relations;
- e) Allow to understand the impacts of the actions in relation to the Stakeholders so as to maximize the positive impacts and mitigate the negative ones; and
- f) Identify future trends in relation to the expectations of Stakeholders and the good practices to be shared by all Group societies.

For the implementation of the *Global Relations Model*, a network of people in charge in each of the subsidiaries shall be defined, which shall be responsible to extend and correctly apply the same *Global Relations Model* across the Group, while the boards of directors of each Group's societies shall be responsible for assessing its implementation and results.

The disclosure of the results of Stakeholder relations shall be carried out mainly through the Company's communication strategy, on the corporate website and on the Society's social media.

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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 February 07, 2024.