

Climate Action Policy

Updated July 15, 2021

The Board of Directors of NEOENERGIA S.A. (the “**Company**”) is vested with the powers to prepare, assess and review the Company’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 Company and of the companies that comprise the Group, for which the Company is the controlling entity, within the meaning established by law (the “Group”).

In exercising these powers and aware that the excellent management of all processes and resources of the companies comprising the Group 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 the Group, the Board of Directors approves this Climate Action Policy (the “Policy”) for the purpose of creating actions to combat climate change.

1. Purpose

The purpose of the Policy is to establish a framework for articulating the Company’s strategy and business model in a manner consistent with its commitment to the fight against climate change.

Climate change is one of the most relevant challenges for humanity in the 21st century. The use of fossil fuels has led to a significant increase in greenhouse gas emissions which has accelerated global warming in recent decades, with consequences that can be seen today.

The Group has included adequate environmental management and the fight against climate change as the pillars of its Governance and Sustainability System, inspired by the best references in terms of climate governance. In this sense, the Group is aware of the contribution of its activities to achieving the climate goals of de-carbonization, as well as the need to have the skills and proper mechanisms with regard to adaptation to climate change.

Accordingly, the Company undertakes to: (i) maintain a leadership position in the fight against climate change directly or through alliances with other agents; (ii) promote a social culture aimed at raising awareness among all its Stakeholders about climate change and the benefits of fighting it; and (iii) actively and decisively contributing to a sustainable and carbon neutral future, minimizing the environmental impact of all its activities and promoting the adoption of actions within the Group's reach to neutralize its emissions.

The Group shall continue to analyze and identify concrete actions in the fight against climate change (“Climate Action”), which allow: (i) to detect and seize the opportunities that may arise from a de-carbonized and more electrified economy; (ii) increase adaptive capacity; (iii) strengthen resilience; and (iv) reduce vulnerability to climate change, as established by the Paris Agreement and the Sustainable Development Goals (SDGs) approved by the United Nations (particularly, with numbers seven and thirteen).

2. Scope

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

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

This Policy shall also apply, as appropriate, to the joint ventures, temporary joint ventures and other equivalent associations, over which the Company has management influence.

3. Main principles of conduct:

To achieve the implementation of its commitment with climate change, the Group shall be guided by the following main principles of conduct, which shall be applied on a progressive basis in all its business activities:

- a) Establish and review goals for mitigating climate change related to short-, mid- and long-term emissions and aligned with the goals of Paris Agreement and the successive reviews promoted by the Science of Climate Change, so as to place the intensity of emissions below the level of 50 grams of CO₂ per kWh by 2030, aiming to achieve carbon neutrality 2050;
- b) Integrate climate change in strategic planning and decision-making processes, as well as in the analysis, management and reporting of climate risks, especially in the long term, considering the recommendations of the *Task Force on Climate-related Financial Disclosure* (TCFD), or other benchmark organizations, with regard to climate governance and information on risks and opportunities in this area;
- c) Promote innovation in more efficient technologies that are less intensive in the emission of greenhouse gases and gradually introduce them at the Group's facilities;
- d) Involve all Stakeholders in the periodic update of the Climate Action Plan, through bidirectional communication based on the creation of sustainable value for all Stakeholders, in compliance with the provisions of the Stakeholder Relations Policy, with the aim of developing a fair transition strategy for the energy model;
- e) Include the execution of the Climate Action Plan among the parameters that can be considered in the Company's compensation systems;
- f) Contribute to global awareness of climate change, its consequences and solutions, as well as the urgent need to implement measures aimed at generating knowledge, mobilizing and promoting Climate Action, as it poses a threat to individuals and communities. This is in line with the Group's commitment to respecting the right to the environment of all communities covered by the Human Rights Respect Policy;

- g) Promote knowledge and internal training of the Group's professionals in matters of climate change, as well as outsourced workers;
- h) Promoting suppliers' knowledge of climate change and encouraging them to adopt practices consistent with those of Company in this matter, particularly with regard to reducing the carbon footprint;
- i) Publicly support and lead the main milestones of the global climate agenda and multilateral processes on climate change, adopting positions consistent with the Company's goals and with the environmental policies of the Governance and Sustainability System, in the jurisdictions where the Group has a presence;
- j) Promote private sector participation in the global climate agenda to meet the Paris Agreement goal of "holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C". Accordingly, the Company undertakes to introduce a more ambitious dynamic, both with regard to the implementation of the aforementioned agreement and the review of the commitments assumed by the parties;
- k) Have an environmental management system for the Group, which enables environmental risks to be assessed, analyzed, managed, and reduced, in addition to improving the management of resources and optimizing investments and costs, based on the inclusion of relevant climate variables;
- l) Actively encourage a culture that promotes the efficient and responsible use of energy, as well as the behaviors that favor such responsible use, engaging all Stakeholders of the Company for this purpose. Particularly, professionals shall be encouraged to contribute, through their daily work, to the achievement of goals related to combating climate change; and
- m) Promote research and development of methodologies for the assessment and planning of adaptation measures to climate change, and mitigate the impacts of climate change on energy production through renewable sources, integrating climate science into goal setting and internal procedures.

4. Priority action lines:

The Group shall promote the following priority lines of action to develop the basic principles of conduct set out in the previous section:

- a) formalize and communicate a Climate Action Plan specifying (i) the commitment to achieve CO₂ neutrality by 2050; (ii) the intermediate goals for scopes 1, 2 and 3 of the greenhouse gas inventories; (iii) the strategy and assumptions of the investments intended to be fulfilled with this commitment; and (iv) the frameworks and methodologies, based on available science, used to assess and report on the plan execution;
- b) Contribute to the electrification of the economy and maintain the Group's global leadership in renewable energies and in the investment and operation of smart grids that enable a high integration of said renewable energies, supporting legal regulation initiatives aimed at:

- higher electrification of consumer and economic uses, through electric mobility, heat pumps, and efficient domestic heating and air conditioning systems;
 - promote the "polluter pays" principle by advocating emissions pricing mechanisms that generate a strong and sustainable price signal capable of generating the resources needed to equitably fund sustainable energy projects in both industrialized countries and emerging and developing economies, and by supporting a tax system that integrates this principle across the transportation, building, and electricity production sectors;
 - eliminate subsidies for high-emission technologies or sectors;
 - promote the replacement of energy generation systems based on the use of fossil fuels with higher carbon content and foster improved efficiency in the generation, transmission and end-use of energy, all within the framework of a growing electrification of the energy model; and
 - continue developing the global energy transition that, starting with the decarbonization and electrification of the energy sector, particularly, and of the economy as a whole, contributes to the Sustainable Development Goals (SDGs) approved by the United Nations, especially with regard to the fight against climate change and its impacts;
- c) integrate climate science and adaptation and resilience criteria, as well as include technical improvements in the design, construction and management of energy generation, storage and distribution networks and infrastructure, to reduce or avoid the potential impacts of climate change on their functionality and enable the Group to adapt to changes in energy demand resulting from climate change;
- d) analyze the risks arising from climate change in the context of the energy transition, as well as physical risks;
- e) periodically inspect the Group's inventory of greenhouse gas emissions and establish control and monitoring mechanisms, including assessment of emissions by an independent third party;
- f) develop campaigns and communication materials, workshops or educational resources aimed at specific groups, or collaborating on projects with third parties, both from the public and private sectors, to promote communication and training of the Group's professionals in Climate Action;
- g) formalize cooperation agreements with multilateral organizations and civil society organizations with special engagement in combating climate change and, particularly, with the UN Framework Convention on Climate Change, aiming to consolidate the Group's leadership in the process of combating climate change;
- h) support public policies and strategies addressing, on a coordinated and consistent basis, the social issues relating to climate change;
- i) lead the main international indices related to combating climate change and its impacts;
- j) disseminate actions and results achieved by the Group regarding the fight against climate change; and

k) establish the mechanisms required to ensure the coordinated application of this *Policy* throughout the Group.

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This Policy was initially approved by the Board of Directors on July 19, 2018 under the title of Policy Against Climate Change and was last reviewed and renamed as Climate Action Policy at the Board of Directors' Meeting held on July 15, 2021.