

Human Capital Structure Policy

Updated July 19, 2022

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 Neoenergia Group, the Board of Directors approves this *Human Capital Structure Policy* (the “**Policy**”).

1. Purpose

The purpose of this *Policy* it is to define, develop and disseminate a human capital management model for the Group that allows attracting, promoting, ensuring loyalty and retaining talent. In addition, it aims to foster the personal and professional growth of all the people belonging to the Group's human staff, enabling them to participate in its project for business success and ensuring them a dignified and safe workplace in a diverse and inclusive environment.

This Policy, which content is consistent with the provisions in the *Human Rights Respect Policy* and, particularly, the labor rights, is further developed by the following policies: the *Equity, Diversity and Inclusion Policy*, the *Recruitment and Selection Policy*, the *Knowledge Management Policy*, and the *Occupational Health and Safety Policy*.

The human staff fundamentally determines the difference between competitive companies and those that are not, and between those that sustainably create value and those that gradually lose their capacity to produce wealth.

The key principles for the conservation of human capital include the design and implementation of human capital management and labor relations structures that allow the Group's success to be shared with all employees and promote their economic and social development, thereby contributing to compliance with goal eight of the Sustainable Development Goals (“SDGs”) approved by the United Nations, which are supportive of competitiveness and business efficiency.

This *Policy* also establishes the guidelines that shall govern labor relations in the different companies of the Group and serves as a reference for defining the goals of the Company and the Group in the management of human capital. Specifically, it sets forth the guidelines regarding: (i) the selection of its professionals; (ii) the creation of stable and

quality jobs, in a diverse, inclusive, healthy and safe environment; (iii) the reconciliation of personal and professional life; and (iv) the management of talent promotion and training.

Human capital and labor relations management shall be governed by respect for human and labor rights recognized in national law, respect for diversity, inclusion, equal opportunities and non-discrimination, as well as alignment of the interests of professionals with the Group's strategic goals.

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, in which the Company has management influence.

3. Main principles of conduct

For achieving the planned goals, the Group takes on and promotes the following main principles of conduct that shall govern the management of its human capital:

- a) an appropriate framework of labor relations and agreed mechanisms to adapt the organization to the corporate and social requirements, promoting the goals of competitiveness and business efficiency;
- b) design of a value offering that favors the selection, hiring, promotion and retention of talent, consisting of competitive compensation and a diverse and inclusive working environment that promotes the reconciliation between personal and professional life for the Group's employees; This professional growth shall be based on objective performance criteria, equal opportunities and a commitment to the *Purpose and Values of the Group* and with the Group's business project;
- c) development of consistent human capital management processes that move forward in the implementation of a culture of talent in all states in which the Group operates, respecting local particularities;
- d) definition of the conduct of labor relations based on equal opportunities as a strategic goal, particularly between genders, non-discrimination and respect for diversity and inclusion, in all its variables, in compliance with the *Equality, Diversity and Inclusion Policy*. Likewise, measures shall be promoted to facilitate the effective integration of such groups with different capacities, as well as to obtain a favorable environment that enables professionals to reconcile their personal and professional lives, in compliance with the laws in force and following the best international practices;

- e) encouragement to stable and quality jobs;
- f) a compensation system that allows for the attraction and retention of the best professionals, aligning their objectives with those of the Group;
- g) appreciation of the contribution of all professionals to the Group's creation of value and to its growth;
- h) recognize and value family and personal connections of the Group's professionals, a necessary consequence of the Group's strong local roots within the communities in which it has historically done business, and establish concrete measures to ensure that employees are not favored or discriminated against in hiring and internal promotion processes on the basis of such connections, nor that the principle of equal opportunities is violated;
- i) ensure that the selection, hiring, and promotion processes of the Group's companies assure that all their professionals are persons who are respectable and trustworthy, aligned with the provisions of the Purpose and Values and with the principles contained in the Code of Ethics, assessing their history and rejecting those who lack the required appropriateness due to their background. All of this, without prejudice to the respect for individual identity and convictions, as established in the *Equality, Diversity and Inclusion Policy*; and
- j) a safe, harassment-free and healthy working environment in all Group companies.

4. Instruments

The Company and the Group have the following instruments to achieve these goals:

- a) Human Capital policies: this Human Resources Structure Policy, the *Equality, Diversity and Inclusion Policy*, the Recruitment and Selection Policy, the Knowledge Management Policy, and the Occupational Health and Safety Policy;
- b) the Company's Human Resources Department, which has as its main purpose the standardization of guidelines for the management and promotion of talent in the Group, so as to meet the different social and labor realities in the places where it operates with the support of the human resources departments of the different companies that are part of it, which are in charge of implementing and ensuring compliance with human resources policies and strategies. To achieve this objective, the Company's Human Resources Department may create specialized committees in areas such as the selection and hiring of professionals, training, compensation systems, or social-welfare benefits;
- c) other Group's departments which, aligned with the Human Resources Department, are responsible for implementing, monitoring, and ensuring compliance with the *Equality, Diversity, and Inclusion Policy*;
- d) collective bargaining agreements or specific equivalent agreements governing aspects relating to human resources management, as well as the established specific monitoring mechanisms;
- e) channels for dialogue and communication with employees of the Group: mixed subcommittees or committees with employees, work climate surveys, meetings

with the CEO and senior management, specific meetings, the corporate website and the Group's various intranets;

- f) mobility programs that, aligned with the Group's business model, benefit the sharing of experiences and knowledge, professional development, as well as the promotion of talent and the consolidation of a Group culture;
- g) training programs that foster the development of intellectual capital and the promotion of employees within the Group;
- h) a specific training and improvement program for the leadership team that fosters for internal promotion and ensures the orderly succession of senior management and other key positions in the Group;
- i) occupational risk prevention programs and processes and a global occupational safety and health system based on defined standards applicable to all companies of the Group; and
- j) independent and confidential whistleblowing channels that allow employees to report any non-compliance with the application of the principles of the Group's Code of Ethics.

5. Basic principles of conduct relating to equality, diversity and inclusion

The *Equality, Diversity and Inclusion Policy* develops the Group's goals and principles on the matter, which may be summarized in the following principles of conduct:

- a) Respect diversity among its professionals, promoting the non-discrimination;
- b) Develop the principle of equal opportunities, as its compliance is one of the basic pillars of professional development, and entails the commitment to provide and show equitable treatment that promotes the personal and professional progress of the human staff, avoiding, among other issues, that professionals with family or similar personal connections hold positions that report directly - hierarchically or functionally - to the professionals with whom they are connected; and
- c) Promote gender equality, especially as regards to access to employment, professional training and promotion, and working conditions;

The Company ensures that the processes related to the selection, hiring, management of labor relations, training and promotion of professionals using artificial intelligence and, mainly, ensure that the algorithms used are not biased in a way that violates, due to their design or the result of their effective implementation, the Group's goals and commitments in terms of diversity and promotion of inclusion, nor render their verification impossible due to limitations of transparency and/or traceability of the results.

6. Main principles of conduct in connection with the selection and hiring of professionals

As further developed in the *Recruitment and Selection Policy* and in the *Equality, Diversity and Inclusion Policy*, the main principles of conduct relating to selection and hiring are:

- a) develop a framework process to standardize the Group's selection and hiring procedures;
- b) ensure that the selection and hiring processes are objective and impartial, avoiding that in the selection process of relatives of professionals of the Group or of people with similar personal connections, people with whom they are connected may participate, characterizing a conflict of interest;
- c) encourage the access of young people to their first job through scholarship programs and other agreements;
- d) provide candidates with an attractive value proposition that favors the selection and hiring of the best professionals;
- e) favor the hiring of employees from excluded groups and persons with different abilities.
- f) the Group's value proposal shall be based upon equal opportunities, diversity, inclusion, competitive compensation, a healthy, safe, diverse and inclusive work environment, the business project, balance of personal and professional life, and reconciliation;
- g) ensure that the hiring of its professionals is done through open-ended employment contracts, in compliance with local legislation; and
- h) standardize working conditions and the benefits granted to part-time and full-time employees;

7. Main principles of conduct relating to the management and promotion of talent and training

Talent management and promotion are key aspects to improve the Company's position vis-à-vis its competitors, and aim the definition of a framework to develop a global quality management system, affecting all professionals of the Group.

As a general rule, in the process of analysis and discussion prior to the adoption of its resolutions, the Board of Directors gives special consideration to the impact that its decisions might have on the talent and promotion management strategy of the Group.

One of the key aspects of global talent management within the Group is the encouragement of training, in accordance with the following main principles:

- a) establishment of a conceptual framework that includes all training actions designed to promote the qualification of the workforce, aligning it with a diverse, inclusive and multicultural work environment, permeable to cultural changes, expanding the principles set out in the Purpose and Values, creating value for the Group and promoting the sustainable development of the Company's business;

- b) development of training programs and plans that favor professional improvement for the performance of the job, adequacy to technological and organizational changes, adaptation of the human staff to the Group's requirements, and a broader capacity for professional development. Particularly, such training programs and plans shall facilitate processes for updating knowledge and continuously refreshing skills, so that technologies, innovation and training create an interactive triangle which operation favors the Group's sustainable competitiveness.
- c) make training a key element of professional qualification and development, and providing opportunities for promotion within the Group;
- d) training programs shall include aspects related to the respect for human rights, diversity and inclusion, and promote the ethical behavior culture, without excluding or discriminatory prejudices. Such programs shall be comprehensive, so that the technical, social and human aspects are considered altogether in such a way that professionals develop in their work not only the best qualifications, but also the principles and values that the Group intends to defend before the civil society; and
- e) dissemination and sharing of the knowledge existing within the Group, on-going learning and cultural exchange, so as to boost efficiency through the appropriate use of intellectual capital, in compliance with the provisions of the Knowledge Management Policy.

8. Basic principles of action relating to performance appraisals and development

Employee appraisals and the communication of their results to the appraisees are key aspects of professional development. The basic principles of conduct relating to this area are:

- a) conduct periodic performance appraisals of the Group's employees;
- b) communicate the results to the appraisees so as to favor their professional development; and
- c) avoid, in the process of appraisal or salary review, direct participation by professionals who are family members or who have a similar personal connection with the affected employees.

9. Basic principles of conduct relating to compensation system

The Group views as a priority that the compensation system favor the consolidation of its human capital, as the main distinguishing factor in relation to its competitors. The principles of conduct that shall guide the Group's compensation system are:

- a) favor the attraction, hiring and retention of the best professionals;

- b) keep consistency with the Group's strategic positioning and development, with its international and multicultural reality, and with its goal of excellence;
- c) recognize and reward the dedication, responsibility and performance of all its professionals;
- d) adjust to the various local realities in which the different companies of the Group operate; and
- e) be at the forefront of the market, consistently with the position achieved by the Company and its Group.

10. Main principles of conduct relating to the reconciliation of personal and professional life

Achieving an effective balance between the personal and professional lives of the human staff is a Group's priority, developed through the following basic principles of conduct:

- a) implement reconciliation measures that promote respect for the personal and family life of its professionals and facilitate an optimal balance between the latter and their work responsibilities;
- b) establish effective ways so that the conditions of service provision, especially with regard to the organization of time and the workplace, are flexible and allow for a better adaptation to the different situations that may arise in the professionals' private life.
- c) honor commitments with external institutions, striving to fulfill the commitments acquired, aiming to obtain and keep the certifications and awards granted to the Group in matters of reconciliation;
- d) favor the hiring of those suppliers that adopt internal measures that favor the reconciliation between the personal and professional lives of their professionals; and
- e) respect, recognizing the appropriate reconciliation measures, among others, the situations of single people, married, in a common-law marriage, divorced, separated, widowed, cohabiting with a plurality of people, with or without children, and with any other particular family or affective circumstances, including the specific bond created with pets, as living beings endowed with sensitivity.

11. Main principles of conduct relating to the respect to private life and digital disconnection

The most recent organizational dynamics, from the introduction of new technologies, promote organizational efficiency at the same time as it becomes difficult to establish boundaries between working time and private life. Pursuant to this *Policy*, it is a priority for the Group that its professionals can fully develop their personal life, in a compatible and enriching way with their working activity.

To this end, this *Policy* establishes guidelines that allow the effective segregation of the professional and personal areas, with special attention to the disconnection of digital

devices, without favoring or discriminating against professionals, and based on the following principles:

- a) promote an appropriate digital disconnection policy, aimed at fostering respect for rest time and facilitating that professionals can fully develop their private lives outside working hours and with the least possible interference with their professional obligations, which shall only occur in instances of justified need; and
- b) set disconnection criteria, which shall consider the specific situation of the different professional groups, namely: (i) those who are required to maintain a special availability due to their level of responsibility, due to their involvement in tasks covering territories in different time zones or due to their stand-by position to meet unpredictable needs; and (ii) those who perform their tasks fully or predominantly remotely and, mainly, at their homes.

As for the latter, criteria shall be defined which, without prejudice to the business requirement of controlling the work and the necessary hourly flexibility, ensure full respect for private life and the disconnection from workplace responsibilities.

These disconnection guidelines shall be distinct according to the responsibilities of the different professional groups and shall cover the multiple and varied digital communication and information tools provided for the performance of the work by the professionals, namely mobile devices, computers and tablets enabled for remote work, or in which they receive their professional mails.

12. Global occupational safety and health system

Recognizing of the importance of occupational health and safety risks, the Board of Directors is committed to develop the necessary actions to provide safe and healthy conditions for the prevention of accidents and work-related physical and mental health deterioration, appropriate to the size and context of each organization and the specific nature of the risks for the Group's employees, as well as in their areas of influence, contributing to the fulfillment of the third and eighth SDGs approved by the United Nations.

The *Occupational Health and Safety Policy*, approved by the Board of Directors, aims to establish a common framework for the control and management of occupational safety and health risks within the general guidelines determined in the *General Corporate Risk Management Policy* and cover the basic principles of conduct the companies in the Group on this matter.

The Group's commitments in this area are driven by a series of instruments, which include the development and implementation of a global safety and physical and mental health system, including emotional, psychological and social well-being at work with minimum standards, in order to ensure the consistency of the criteria applied in all Group companies.

All that so that the different levels of the organization are aware of the importance of occupational safety and health for the Group, favoring that all professionals contribute with their daily work to the fulfillment of the goals adopted in this area.

13. Work ethics

The Board of Directors has approved a *Code of Ethics* that sets forth the basic principles of conduct required of the various companies of the Group and of all their employees and management staff, irrespective of their hierarchical level, their geographic or functional location, or the company of the Group at which they render services.

The Compliance Superintendence is responsible for disseminating, interpreting and informing the relevant bodies about the level of compliance with the *Code of Ethics*.

Compliance areas of each Group company or business head office shall apply the Company's Code of Ethics.

14. Basic principles of conduct relating to corporate volunteering

The companies of the Group shall develop corporate volunteering programs and campaigns that promote the participation of its professionals in volunteer actions to put into practice the provisions of the *Purpose and Values* and the *General Sustainable Development Policy* as regards to improving the quality of life of people, care for the environment and sustainable development, as well as universal access to energy and hunger eradication, including collection campaigns for projects that seek to respond to social needs. Thus, such corporate volunteer campaigns and programs represent an additional means of contributing to the achievement of the SDGs approved by the United Nations.

These programs and campaigns shall be guided by the following main principles of conduct:

- a) contribute to social well-being and solidarity;
- b) strengthen a sense of belonging to the Group and improve the labor climate;
- c) contribute to the ethical training of professionals, channeling their solidarity spirit to the benefit of the communities in which the Group is present; and
- d) promote the values of participation, commitment, responsibility and teamwork.

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This Policy was initially approved by the Board of Directors on June 28, 2018 and last amended at the Board of Directors' Meeting held on July 19, 2022.