

Policy for Responsible Use of Artificial Intelligence Tools and Algorithms

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 Company’s conduct and of the companies that are part the Group, for which the Company is the controlling entity, within the meaning established by law (the “**Group**”).

As part of its commitment to the social dividend, the Group's innovation and digital transformation strategy shall be geared towards creating sustainable value.

In view of the importance of artificial intelligence and algorithms in the development and implementation of this strategy, and of the importance of ensuring its responsible use, in accordance with the corporate ideology of the Company and the principles that guide its corporate culture, based on ethics and commitment to sustainable development, the Board of Directors approves this *Policy for Responsible Use of Artificial Intelligence Tools and Algorithms* (The “**Policy**”), in line with the *OECD Council Recommendation on Artificial Intelligence*.

1. Purpose

The purpose of this *Policy* is to establish common and general premises and guidelines for action that should govern the design, development and application of artificial intelligence tools and algorithms, ensuring, in any case, compliance with applicable legislation and other regulations that make up the Governance and Sustainability System.

In that sense, this *Policy* establishes the tools and guidelines to ensure the responsible, transparent, safe and reliable use of artificial intelligence systems and algorithms by the Company.

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.

Finally, the principles established in this *Policy* will also apply to suppliers that develop artificial intelligence tools for the Company or for entities subject to this *Policy*, in everything that occurs.

3. Basic Overall Principles for Responsible Use of Artificial Intelligence Tools and Algorithms

The common and general principles and guidelines for action that should govern the design, development and application of artificial intelligence tools and algorithms to achieve the objective of this *Policy* are detailed below:

a) Tangibility Principle

Tools that use artificial intelligence or algorithms must be at the service of people, generating tangible benefits for the Company and its Interest Groups and, in particular, efforts will be made to ensure that their development contributes to the achievement of the Sustainable Development Goals (SDGs) approved by the United Nations.

b) Principle of respect for human rights, the Neoenergia Group's Purpose and Values and the Code of Ethics

The Company will ensure the responsible use of artificial intelligence and algorithms, in accordance with the Company's commitment to human rights, facilitating in its designs the possibility of human intervention when necessary to ensure the effective fulfillment of said commitment and the principles included in this Policy.

c) Equity principle

The Company will ensure that the artificial intelligence tools and algorithms it uses in the development of its activities drive and promote compliance with the principles of equal opportunities, diversity, promotion of inclusion and sustainability that govern the Neoenergia Group's Objectives and Values and the Code of Ethics, trying to avoid prejudice and discriminatory impacts (for reasons of race, ethnic origin, religion, sex, sexual orientation, disability or any other condition of the people) in its conception, development or application.

d) Principle of "innovative culture"

To reduce groupthink and mitigate unconscious biases and limiting beliefs, Company will ensure that the design, development and application of artificial intelligence tools and algorithms are in line 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.

e) Principle of traceability and verifiability

The Company will ensure that the automated processes in which artificial intelligence and/or algorithms are used do not contain transparency and/or traceability limitations that prevent their objective verification through audit processes.

f) Principle of transparency

When required or advisable, the Company will inform users of the category of personal data that, if applicable, uses artificial intelligence algorithms in its tools, as well as the purpose or purposes of the processing of personal data that give rise to its use, of in accordance with the provisions of the legislation on the protection of personal data applicable in each case.

g) Principle of privacy

The Company will ensure that the artificial intelligence tools and algorithms it uses in the exercise of its activity respect the provisions of the legislation on the protection of personal data applicable in each case and the principles contained in the Personal Data Protection Policy.

h) Principle of Security

The Company shall have physical and logical security systems and mechanisms to protect its artificial intelligence systems and algorithms against any alteration, misuse or unauthorized access and to guarantee the integrity of the data stored or transmitted by them.

i) Principle of Self-regulation

The Company will adopt measures that allow the self-regulation of the responsible use of artificial intelligence tools and algorithms. Among them, it will provide professionals who use these tools with training on artificial intelligence, its functioning and the consequences that may arise from the use of incomplete, biased or non-transparent algorithms and, in particular, on the impact they may have on the Company and its Interest groups.

4. Specific commitment to automated processes using artificial intelligence and algorithms

The Company will ensure that the automated processes in which algorithms and artificial intelligence are used respect the general basic principles described in the previous section, in particular, do not suffer from biases that violate the principles of equal opportunities, diversity and promotion of inclusion, nor make it impossible to verify by limitations of transparency and/or traceability of results.

5. Supervision for Responsible Use of Artificial Intelligence Tools and Algorithms

The Company will have proper, reasonable and effective mechanisms to supervise and control the data used for the development of digital applications and their design, as well as the possible malfunction of artificial intelligence tools and algorithms.

The Company's Cybersecurity Department will assess, at least once a year, compliance with the provisions of this *Policy*, and will report the result of its assessment to the Audit Committee.

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This *Policy* was initially approved by the Board of Directors on July 19, 2022.