

Stakeholder Relations 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**”).

The *Bylaws, Purpose and Values of the Neoenergia Group, Sustainable Development General Policy* and further corporate policies express the Company's guidance for the creation of sustainable value for the Stakeholders related to its business activity and its institutional reality, considering the commitments assumed in the Code of Ethics.

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

The Group is committed to ensuring that all its Stakeholders have a share in the social dividend produced by its activities (the “Social Dividend”), understood as the sustainable creation of value, through: the involvement in the business communities in which the Company 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.

This Social Dividend encompasses the direct and indirect impacts of the development of the activities of the Company's corporate purpose, considering all the Stakeholders and the economic, social and environmental scopes, including, particularly, the Group's contribution to the achievement of the Sustainable Development Goals (“SDGs”) approved by the United Nations.

Stakeholders play a leading role in corporate reputation, which is understood as the set of perceptions about the 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 Stakeholders in order to integrate their expectations into the Group's management 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 commitment to

human rights recognized in national legislation, as well as defines the general principles that shall be applied by the Group 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 companies 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's relations with its Stakeholders in all activities and operations in order to:

- (i) continue promoting the involvement of Stakeholders in the Company's business project, 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 Company has interactions;
- iii) continued generation of trust among the Stakeholders, in order to build long-lasting, stable and robust relationships;
- d) encourage the recognition, by all its Stakeholders, of the Company's commitment to diversity in a broad sense and, particularly, in everything that concerns the professional development of its members; and
- e) contribute to the whole and preserve the corporate reputation of the different locations and businesses in which the Company develops its activity.

Notwithstanding, the 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 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, when the Company is responsible for the management thereof.

3. Company's Stakeholders

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

- a) Human staff;
- b) Regulatory Bodies;
- c) Customers;
- d) Suppliers;
- e) Media;
- f) Society in general;
- g) Environment; and
- h) Shareholders and the Financial Community.

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.

4. Basic Principles:

The Group assumes and promotes the following basic principles to involve and establish relations of trust with its 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 Group's different activities;

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 all Neoenergia's activities, 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's 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.

5. Responsibilities in the management of Stakeholder relations

Neoenergia'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 Stakeholders, ensuring their adequate coordination within the Group.

Thus, the Company'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.

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 companies.

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 in the subgroups, as well as of these in the Group;
- b) Ensure that the Stakeholders have sufficient conditions to communicate with the 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, robust, and lasting relationships;
- c) Provide the identification and prioritization of the relevant issues (needs and expectations) for each Stakeholder, as well as identify and manage the 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, impact 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 companies.

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 company 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 Company'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 July 15, 2021.