

INNOVATION POLICY

Updated June 18, 2026

NEOENERGIA S.A.'s (the "**Company**") Board of Directors has the power to prepare, evaluate and consistently review the Company's Governance and Sustainability System, as well as approve and update policies that contain guidelines that govern its performance. They may also provide notice of, as applicable, the policies that they autonomously decide to approve at companies that are part of the group where the controlling company by law is the Company (the "**Subsidiaries**" and "**Neoenergia Group**").

In exercising these powers and in accordance with applicable law, the Company's *Articles of Incorporation*, and the *Iberdrola Group's Purpose and Values* (the "**Purpose and Values**"), the Board of Directors hereby approves this *Innovation Policy* (the "**Policy**"), which respects, builds upon, and adapts the *Iberdrola Group's Ethical and Basic Principles of Governance and Sustainability* (the "**Ethical and Basic Principles of Governance and Sustainability**" and the "**Group**," respectively).

1. Scope

This Policy shall apply to the Company. Nevertheless, it includes principles that complement, in the scope of innovation, the *Ethical and Basic Principles of Governance and Sustainability*. To this extent, the principles of this *Policy* inform the specific actions and regulations of the Subsidiaries, observing their powers and autonomy in this matter.

These principles should guide, when applicable, the performance of the Neoenergia Institute, linked to the Neoenergia Group.

The Company will ensure that the regulations of the companies in which it holds an interest but that are not part of the Neoenergia Group, as well as those of joint ventures, temporary consortia, and other entities it manages, are aligned with the principles set forth in this *Policy* regarding innovation.

2. Purpose

The purpose of this *Policy* is to establish the guiding principles that should govern the definition and implementation of an innovation strategy that enables the Company, as the Group's subholding company in Brazil, together with the other Group companies, to continue leading the electric power sector and spearheading the transition toward a more electrified, sustainable, and accessible energy model.

The focus on innovation is a priority to promote sustainability, efficiency and competitiveness, as well as to keep the Company at the forefront of the development of new products, services and business models that are transforming the sector.

The Company views innovation as a decentralized and open process: decentralized, because it takes place independently within each business unit, yet in a manner consistent with the support and coordination provided by the Company's Office of the CEO and Innovation Board (or the department that assumes its functions at any given time); open, because the Company is a technology-driven enterprise and, as such, its mission is to involve all of its technology suppliers, including startups, universities, technology centers, and equipment manufacturers, in its innovation process.

3. Principles of action

The Company assumes and promotes the following principles of action with respect to the innovation strategy:

- a) Lead innovation focused on energy efficiency and greater electrification of demand.
- b) Encourage Research, Development and Innovation (RD&I) activities, based on efficiency oriented to the continuous optimization of business operation, management of the useful life of facilities and equipment, reduction of operating and maintenance costs, reduction of environmental impact, as well as the development of new products and services to meet customer needs.
- c) Drive the digital transformation of the businesses developed by the Company and its Subsidiaries to improve the efficiency of its processes, operation and maintenance of its assets and to increase the availability of its generation assets.
- d) Stay at the forefront of new technologies and disruptive business models, fostering an "innovative culture" that permeates the entire organization and promotes a work environment that motivates, favors and rewards the generation of ideas and innovative practices carried out by professionals, accepting the implicit risk and recognizing creative contributions.
- e) Foster the creation of innovative ecosystems based on attracting foreign talent and exploring new forms of collaboration to gain knowledge and develop new solutions that create value in a sustainable way.
- f) Promote innovation by collaborating with startups, entrepreneurs and suppliers in order to develop new disruptive and sustainable business models, as well as favor the exchange of knowledge and the impact produced by them.

- g) Encourage collaboration and partnerships with the academic, intellectual and technological world, through links that allow to multiply innovative capacity and collaborate in the dissemination of knowledge.
- h) Obtain innovations that favor sustainable growth, efficient management of resources and reduction of environmental impacts, contributing to the social and economic development of the environment in which the Company carries out its activities.
- i) Develop projects in the area of universalization of electrical services, based on environmentally sustainable, economically viable models.
- j) Integrate innovation into all training content of the Society through specific courses and programs to develop skills related to creativity.
- k) Implement an innovation management system that includes the establishment of annual goals and objectives within a continuous improvement process, managing the company's human and intellectual capital as an essential support for the entire creative and innovative process.
- l) Promote innovation in the technological, commercial, industrial, scientific, organizational, or financial spheres, among others, by encouraging fair competition among companies within the framework of a social market economy, which is a key factor for long-term sustainable development and, in particular, information or knowledge considered (or likely to be considered) a trade secret, given the importance of its protection, insofar as it confers a real or potential competitive advantage and, therefore, represents significant corporate value to the Company.
- m) Promote internal talent and stimulate creative thinking, developing a culture of innovation at all levels that facilitates successfully promoting the challenge of incorporating new technologies.
- n) Promote a technological monitoring and prospecting system that allows identifying opportunities and challenges for business and detecting innovation needs in processes or services in order to anticipate technological changes and market needs and risks.
- o) Disclose internally the knowledge generated, so that professionals know the best practices applicable to their activity in the search for efficiency and effectiveness in the Company's processes.

- p) Protect the results of the innovation process, properly and ethically managing intellectual and industrial property, which in any case will imply respect for the property rights of third parties.
- q) Enhance innovations that contribute added value to users and increase the satisfaction of Neoenergia Group employees, shareholders, the financial market, customers and other Stakeholders of the Company.

4. Coordination at Group level

Within the specific scope of action of each company, the Company's Office of the CEO and Innovation Board (or the department that assumes its functions at any given time) will work in coordination with the Technology Division of Iberdrola, S.A. and will establish the framework for coordinating relations with its subsidiaries to ensure an appropriate, consolidated level of maturity and risk management in terms of innovation.

5. Implementation and monitoring

For the implementation and monitoring of the provisions of this Policy, the Board of Directors has the Office of the CEO and Innovation Board, which will develop the necessary procedures to do so.

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This Policy was initially approved by the Board of Directors on July 19, 2018 and last reviewed and updated at the Board of Directors' Meeting of June 18, 2026.