

CIRCULAR ECONOMY POLICY

October 13, 2026

The Board of Directors of Neoenergia S.A. (the “Company”) is responsible for designing, assessing and continuously reviewing the Company’s Governance and Sustainability System and, in particular, for approving and updating the policies that establish the guidelines governing the Company’s activities. Where applicable, such policies also inform and serve as a reference for policies that may be approved, in the exercise of their autonomy and discretion, by the companies within the group whose parent entity is the Company pursuant to applicable law (the “**Subsidiaries**” and the “**Neoenergia Group**”).

In exercising these powers, within the framework of applicable laws and regulations, the *Bylaws*, the *Purpose and Values of the Neoenergia Group*, and mindful of its commitment to the environment in general and to the sustainability of natural capital in particular, the Board of Directors hereby approves this *Circular Economy Policy* (the “**Policy**”), which observes, develops and adapts, as applicable to the Company, the *Ethical and Basic Principles of Governance and Sustainability of the Neoenergia Group*.

The Company recognizes the need to continue advancing toward a model that promotes the circular economy and acknowledges that this is one of the pillars of its environmental strategy and sustainable value creation.

1. Scope of Application

This *Policy* applies to the Company. Notwithstanding the foregoing, it includes basic principles that supplement, with respect to the circular economy, those set forth in the *Ethical and Basic Principles of Governance and Sustainability of the Neoenergia Group*. Accordingly, these principles shall guide the actions and regulatory developments implemented in this area by the other Group companies, in the exercise of their respective powers and within the scope of their autonomy and discretion.

To the extent that they form part of the Group, listed subsidiaries whose securities are traded in the market, as well as their subsidiaries, may, under their own enhanced autonomy framework, establish principles and rules whose content shall be consistent with the principles set forth in this Policy.

These principles shall also guide, where applicable, the activities of foundations affiliated with the Group.

In addition, the Company will promote the alignment of internal rules with the basic circular economy principles set forth in this Policy at other companies in which it holds an interest but that are not part of the Group, as well as at joint ventures, consortia and other entities under its management.

2. Purpose

The purpose of this *Policy* is to establish the principles and priority lines of action for the circular economy as part of the Company's strategy and business model, and to improve circularity across its operations and value chain.

3. Basic Principles of Action

The Company seeks to enhance the circularity of its operations and value chain in order to minimize resource depletion and decouple economic growth from the consumption of virgin raw materials, in line with the general principles underpinning the circular economy: (i) eliminating waste and pollution by design; (ii) keeping products, components and materials at their highest level of value and utility for as long as possible; and (iii) regenerating natural systems, thereby promoting circular models that are environmentally, technically and economically sustainable.

In this context, the Company adopts and promotes the following basic principles of action:

- a) Drive efficiency in its operations and processes, as well as those of its customers and suppliers, through the electrification of the economy and the maximization of the useful life of its assets and products.
- b) Improve circularity across its operations and value chain through innovation, the sustainable use of natural resources, life-cycle assessments, the eco-design of assets and infrastructure, optimized management, and the use of recycled materials.
- c) Promote the use of secondary raw materials in its assets, facilities, products and services, while enhancing their reusability, recyclability, durability and adaptability without compromising safety or functionality.
- d) Apply a circular hierarchy to the activities it promotes, in the following order of priority: (i) reject, from the project design stage, any unnecessary activity or use of materials; (ii) reduce consumption; (iii) promote reuse; and (iv) recycle equipment and materials, using energy recovery only as a last resort and avoiding landfill disposal whenever possible.

This waste hierarchy may be implemented, in particular, through ambitious and comprehensive asset management plans covering the full asset life cycle, prioritizing circularity and minimizing, to the greatest extent possible, the loss of value from waste (*downcycling*).

- e) Promote the responsible use of energy, support energy-saving and energy-efficiency measures, and contribute to sustainable development through awareness campaigns that encourage the efficient and responsible use of the Company's products and services.
- f) Collaborate with suppliers and other value-chain participants to promote circularity principles in the products and services acquired by the Company.
- g) Promote digitalization and access to relevant information on the circularity of products acquired by the Company in order to develop better management processes and appropriate improvement strategies.
- h) Apply the water management hierarchy—eliminating or reducing consumption, promoting reuse and recycling, and prioritizing non-potable water sources—while

managing water-scarcity risks; ensuring that water used is returned to the environment under appropriate conditions; preventing and mitigating contamination of aquatic ecosystems throughout the Company's value chain; and considering water-related challenges and the conservation of water resources in the development of products and services.

- i) Conserve and regenerate ecosystems in accordance with the provisions of the *Biodiversity Policy*.
- j) Promote synergies and contributions to the fight against climate change and to the energy transition, in accordance with the provisions of the *Climate Action Policy*.
- k) Integrate the circular economy into the environmental management model established at Group level, together with climate action and biodiversity, to assess, analyze, manage and reduce risks to natural capital, as well as improve resource management and optimize investments and costs.
- l) Raise awareness of, train and engage its employees in the principles of this *Policy*, as well as members of the supply chain and other stakeholders.
- m) Promote the use of traceability mechanisms and certification systems to verify compliance with circularity criteria or standards for products, components and raw materials supplied to the Company.
- n) Continue developing *due diligence* processes within management systems for circularity-related incidents, risks and opportunities, while identifying actions and promoting collaboration with stakeholders, taking into account that today's value chains are globally structured and not all links have sufficient traceability mechanisms.
- o) Report transparently on the Company's actions and, where appropriate, those of all Group companies in the field of the circular economy.

4. Priority Lines of Action

The Company establishes three priority lines of action to promote the circularity of its operations and value chain, to which the basic principles of action set forth in this *Policy* and in the *Ethical and Basic Principles of Governance and Sustainability of the Neoenergia Group* shall apply: (i) promoting the continuous improvement of its supply

chain; (ii) improving the circular performance of internal processes; and (iii) offering products and services designed to improve customers' circularity performance.

5. Group-Level Coordination

The Vice Presidency for Regulation, Institutional Affairs and Sustainability, through the Corporate Sustainability Department (or any other Vice Presidency and Department that may assume its responsibilities from time to time), shall coordinate with the Technology Division of Iberdrola, S.A. (or any other Division or Department that may assume its responsibilities from time to time) to ensure that the circular economy is integrated into the strategy established at Group level. This shall be carried out through oversight and coordination with the relevant departments of its Subsidiaries and, where appropriate, through the development of the necessary procedures.

6. Implementation and Monitoring

For the implementation and monitoring of this Policy, the Board of Directors is supported by the Corporate Sustainability Department (or the department that may assume its responsibilities from time to time), through the Company's Sustainability and Reputation Committee. Where applicable, periodic monitoring and reporting procedures shall be established for the relevant governance bodies.

* *

This *Policy* was approved by the Board of Directors on October 13, 2026.