# **NEOENERGIA BRAND POLICY**

Updated on October 16th 2025

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 the Company's performance. They may also provide notice of, as applicable, the policies that, during the exercise of their autonomy, they decide to approve at companies that are part of the group where the dominant entity is, as established by law, the Company (the "Group").

In the exercise of these powers and within the scope of existing legislation, the Company's Articles of Incorporation and the Neoenergia Group's Corporate Purpose and Values, as well as its Sustainable Development Strategy, the Board of Directors hereby approves this Personal Data Protection Policy ("the **Policy**"). This Policy will respect, develop and adapt the Group's Core Ethical Principles of Governance and Sustainability.

### 1. Scope

This Policy is applicable to the Company. Nevertheless, this Policy describes the actions and regulatory developments that must be carried out by the other companies of the Group while observing their competencies and their autonomy.

Without prejudice to the provisions of the previous paragraph, this Policy includes principles that complement, in relation to the Neoenergia brand, the items contained in the Neoenergia Group's Core Ethical Principles of Governance and Sustainability. To the same extent, these principles must be applied to regulatory actions and developments that, in the exercise of their powers and under the protection of their autonomy, other Group companies execute in this regard.

## 2. Purpose

The purpose of this Policy is to protect and assign value to the Neoenergia brand and establish principles of action that will allow companies belonging to the Group to leverage the brand in a manner that contributes to their reputation and the success of their business activities.

## 3. The Neoenergia Brand

The Neoenergia brand belongs to the Company, establishes the visual identity, values and attributes of the brand. It constitutes one of the Company's strategic assets across the economic and social, environmental and corporate governance spheres. Neoenergia's brand constitutes the identity of the Company, the Group and is a main symbol of the *Neoenergia Group's Corporate Purpose and Values*.

As a symbol of the Company's identity, the Neoenergia brand is a key element of its corporate strategy, as well as other Group companies. As a symbol of *Neoenergia Group's Corporate Purpose and Values*, the Company's constitutes a means of creating sustainable value that can be harnessed by all Group companies and therefore contribute to the success of their business activities.

The Neoenergia trademark is a trademark registered with the INPI – National Industrial Property Institute and comprises a written component (the term "Neoenergia") and another graphic, which is represented by a leaf, an image of a drop and a flame. This graphic appears at the top of the word Neoenergia ("**Iberdrola Logo**"). The use and adaptation of drawings and the brand are governed by the *Neoenergia Brand Use Guide*.

The Neoenergia brand must always be accompanied by the Iberdrola Logo, which is used by Neoenergia under a trademark license agreement. The use of the Iberdrola Logo is translated and consolidated in the adoption and incorporation of standards, methods, principles, values and practices of excellence recognized worldwide. This allows Neoenergia to benefit from advantages related to the intangible value of its corporate brand, as well as to gain access to certified financiers, resources and suppliers due to improvements in that manner it is perceived on the market and by Interest Groups in general.

Group companies must ensure that the Neoenergia brand and the Iberdrola Logo are subject to the principles set forth in the Neoenergia Group's Corporate Purpose and Values and Core Ethical Principles of Governance and Sustainability. As a result, the Neoenergia brand is linked to maximizing the Company's social value in a sustainable manner, improving the quality of life of people in communities where its activities are carried out, individual safety of people and the safe supply of energy, as wel as concern for and protection of nature and customer information.

The Neoenergia brand contributes to the Company's cooperative with its shareholders, to foster their involvement and that of their Interest Groups in social life. It reinforces the Company's identification among Interest Groups and assists in aligning the interests of shareholders at other Interest Groups with those of the Company.

Additionally, the use of the Iberdrola Logo benefits the business activities of the Group's companies and, in general, relations with their respective Interest Groups.

#### 4. Brand use

The Company may authorize the use of the Neoenergia brand and the Iberdrola Logo among other companies of the Group and related institutional entities. Authorized entities are obligated to comply with the provisions of this *Policy* and, in thei specific case, the corresponding trademark license agreement under which the terms and conditions for use of the Neoenergia brand and the Iberdrola Logo are determined. The Company may authorize the use and assign the Neoenergia brand, as well as the Iberdrola Logo while the Group remains under the shareholding control of Iberdrola S.A.

Additionally, they must use the Neoenergia brand homogeneously and according to the criteria set forth in *Neoenergia Brand Use Guide*, in force and the quality control clauses of the corresponding brand license agreement. Any use of the Neoenergia brand that deviates from the guide's provisions must be previously authorized according to the guide itself.

The Neoenergia brand may be part of the logos and trade names used by the Group's companies during their business activities and by related institutional entities during the course of their activities.

Authorized companies must ensure that the use of the Neoenergia brand does not generate confusion regarding its identity and corporate autonomy. In a similar manner, use of the Neoenergia brand must not generate confusion or conflict with Iberdrola's brand.

For these purposes, except in the cases provided for under the Neoenergia Brand Use Guide, all Group companies (except the Company itself) that make use of the Neoenergia brand will use it together with their own name.

The use of the Neoenergia brand by authorized companies during their business activities and in activities with third parties through sponsorship agreements or agreements of any other legal nature, must be aimed at enhancing its value, preserving the reputation of Group companies and favoring the development of their business processes.

Group companies must use, in any case, a trade name and a distinct brand that allows them to be identified as an autonomous entity belonging to the Group. In such cases, ownership of the corresponding trademark will be held by each publicly traded company.

## 5. Interruption of brand use

Group companies of will cease to use the Neoenergia brand - including its trade name, corporate name, the Iberdrola Logo and brand colors - in the situations provided for in the corresponding license agreement. Use of Neoenergia's brand must be interrupted under any circumstance if use of the brand may pose a risk to the reputation of Group companies or to the reputation of Iberdrola S.A. or its corporate group, as well as whenever the company no longer belongs to the Group or Neoenergia ceases to be controlled, whether directly or indirectly, by Iberdrola S.A. The same principles will also be applied to the Neoenergia Institute, which is linked to the Neoenergia Group.

In the such cases, whenever justified, the Company may authorize the use of the Neoenergia brand on a temporary basis among companies that no longer form part of the Group.

## 6. Brand protection

Group companies must protect and assign value to the Neoenergia brand and seek the effective protection of the Company's rights worldwide and in all areas in which Group companies are or are expected to be present, including, in particular, on the Internet and social networks.

Group companies and Neoenergia Institute, which is linked to the Group may not, whether directly or through third parties, apply for and/or register trademarks, trade names, domain names, social media profiles or any other symbol identical or similar to the Neoenergia brand, without the prior authorization of the Company.

## 7. Implementation and monitoring

As part of the implementation and monitoring of the provisions of this Policy regarding the impact that the use of the Neoenergia brand may have on corporate reputation, the Board of Directors relies on the Marketing Department(or the area that may come to assume its competencies). With regards to the proper use of the Neoenergia brand during the course of business, each Group subholding company will be responsible for ensuring proper compliance with this Policy under the respective brand license agreements into which they have entered.

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This Policy was initially approved by the Board of Directors on July 19, 2018 and last updated at a meeting of the Board of Directors held on October 16th 2025.