Securities Trading Policy of Neoenergia S.A. and its Subsidiaries

April 23, 2019

I – DEFINITIONS AND ADHERENCE

1. The definitions used in this Trading Policy shall have the meanings assigned to them in the Definitions Applicable to the Securities Trading Policy of Neoenergia S.A. and its Subsidiaries, which form an integral part of this Trading Policy as Annex I.

2. The controlling shareholders and persons appointed by them who have access to Company information, its subsidiaries and affiliates, as well as members of the Board of Directors, Fiscal Council and Executive Board, members of any bodies with technical or advisory functions created pursuant to the Bylaws, employees and third parties engaged by the Company who have permanent or occasional access to Material Information concerning the Company, its Subsidiaries and Affiliates, shall sign the Instrument of Adherence to the Trading Policy, the form of which is attached as Annex II, thereby becoming Covered Persons for the purposes hereof.

3. With respect to Covered Persons, the Company and its management may require other persons to sign the Instrument of Adherence whenever the Company deems it necessary and/or appropriate because such persons are involved in a specific transaction, as determined by the area conducting the transaction, which shall be responsible for controlling such persons' instruments of adherence.

4. Covered Persons shall adhere to this Trading Policy by signing the applicable instrument upon hiring, election, promotion or transfer, declaring that they are aware of the terms of this policy and undertake to comply with them.

4.1. Adherence to this Trading Policy shall be the responsibility of the hiring executive department. Each department shall report executed instruments to the department responsible for People Management, which shall maintain an updated register and, if and when requested, make the information available to the Investor Relations Department.

4.2. With respect to members of the Board of Directors, Fiscal Council and any bodies with technical or advisory functions created pursuant to the Bylaws, adherence to this Trading Policy shall be the responsibility of the Corporate Governance area.

5. The Company shall keep the Instrument of Adherence on file at its registered office for as long as the person maintains a relationship with the Company and for at least five years after such relationship ends.

6. The Company shall maintain at its registered office a list of Covered Persons and their respective identification details, including office or function, address and CPF and/or CNPJ registration number. If a shareholder is domiciled abroad, the list shall include the name or corporate name and CPF or CNPJ registration number of its attorney-in-fact or legal representative in Brazil. The information shall be updated whenever necessary, within 05 (five) days from the date of the change.

II – PURPOSE

7. This Trading Policy establishes the rules to be observed by Covered Persons in connection with trading in Securities. These rules define periods during which Covered Persons must refrain from trading in Securities, in order to avoid questions regarding the misuse of Material Information not disclosed to the public and to ensure transparency for all interested parties, without favoring some over others.

8. The Company's Trading Policy was prepared in accordance with CVM Instruction No. 358, dated January 3, 2002, as amended, which shall be observed by all Covered Persons together with this Trading Policy.

9. Any questions regarding this Trading Policy, applicable regulations issued by the CVM and/or whether a particular trade may be carried out shall be addressed to the Finance and Investor Relations Executive Officer.

III – TRADING RESTRICTIONS AND INFORMATION REPORTING OBLIGATIONS

10. Before Material Information is disclosed to the public, Covered Persons who are aware of such Material Information, whether through personal knowledge and/or knowledge of the disclosure date, are prohibited from trading in Securities or providing recommendations or investment assistance relating to Securities.

11. Covered Persons who leave their office, function or position in the Company's management before disclosure of Material Information originating during their term of management or service may not trade in Securities until the earlier of: (i) 6 (six) months from the date of departure; or (ii) public disclosure of the Material Information.

12. The restrictions under this Trading Policy apply to transactions carried out directly and/or indirectly by Covered Persons, except transactions carried out by investment funds in which Covered Persons hold units, provided that such funds are not exclusive funds and their trading decisions are not directly influenced by Covered Persons.

13. Covered Persons shall ensure that persons with whom they maintain a commercial, professional or fiduciary relationship do not trade in Securities when they have access to undisclosed Material Information. Covered Persons shall use their best efforts to ensure that all persons with access to Material Information execute the Instrument of Adherence.

14. Covered Persons shall take all necessary measures to extend the restrictions in this Chapter to Related Persons.

15. Trading in Securities by Covered Persons is prohibited whenever a publicly known process for the acquisition or sale of Company shares by a Covered Person is underway; whenever an agreement or contract for transfer of the Company's control has been entered into or an option or mandate has been granted for the same purpose; and whenever there is an intention to carry out a merger, total or partial spin-off, consolidation, transformation or corporate reorganization involving the Company.

16. The restrictions on trading in Securities shall be observed by Covered Persons until the Material Information is disclosed to the public. Such restrictions shall remain in effect after disclosure if trading by Covered Persons could adversely affect the Company or its shareholders in connection with the act or fact associated with the Material Information.

17. Covered Persons may establish individual trading plans for securities issued by the Company, which shall be submitted to the Investor Relations Officer for review and filed at the Company's registered office.

18. An Investment Plan shall be approved only if its terms prevent the use of Material Information based on inside information. It must be structured so that the purchase or sale decision cannot be made after the information becomes known, and the holder shall refrain from influencing the transaction while undisclosed material information is pending.

19. The Investment Plan shall specify the nature of the scheduled purchase and sale transactions, as well as dates, quantities and prices, or a predetermined criterion for defining those elements, consistent with this Policy. Covered Persons shall notify the Stock Exchange or Market Entities of their periodic securities trading plans.

IV – PROCEDURES FOR REPORTING INFORMATION ON SECURITIES TRANSACTIONS

20. Controlling Shareholders, members of the Board of Directors, Executive Officers, members of the Fiscal Council, members of any other technical or advisory bodies created pursuant to the Company's Bylaws and other persons subject to this Policy shall, through the Finance and Investor Relations Officer, report on the

first business day after taking office, as applicable, their ownership of Securities issued by the Company or its controlling companies or subsidiaries, provided that they are publicly held companies, including derivatives and any other securities referenced to such Securities, whether held in their own name or in the name of Related Persons, as well as transactions involving such Securities.

21. The report shall also include transactions involving derivatives or any other Securities referenced to securities issued by the Company or its controlling companies or subsidiaries, provided that they are publicly held companies. The report shall be submitted to the Finance and Investor Relations Executive Officer: (i) on the first business day after taking office; and (ii) within 5 (five) days after each transaction, indicating the position balance before and after the transaction, pursuant to Annex III.

22. The report referred to in this Section shall be prepared pursuant to Annex II to this Policy and submitted to the Investor Relations area.

23. The Finance and Investor Relations Executive Officer shall report to the CVM: (i) in the first case, immediately after receiving the report from any person subject to this Section; and (ii) in the second case, within 10 (ten) days after the end of the month in which a change in positions occurred, indicating the position balance for the period and observing Article 11 of CVM Instruction No. 358/02.

24. If any person required to report fails to disclose their position in Securities under this Section, the Finance and Investor Relations Officer shall not be liable for the failure to report.

V – BLACKOUT PERIOD

25. Persons Subject to the Trading Policy and their Related Persons are prohibited from trading in Securities issued by the Company during the following periods:

• During the 15 days preceding disclosure of the Company's quarterly information (ITR) and annual financial statements (DFP);

• When they have access to Material Information not yet disclosed to the market through the CVM and the Stock Exchange;

• While the Company is acquiring or disposing of its own Shares;

• When there is an intention to carry out a merger, consolidation, total or partial spin-off, transformation or corporate reorganization involving the Company;

• After termination of employment or services, until the relevant information becomes public; and

• During any other periods determined by CVM Instruction No. 358/02.

VI – GENERAL PROVISIONS

26. Upon signing/accepting the Instrument of Adherence, Covered Persons shall inform the Company, through the Finance and Investor Relations Officer, of their trading and investment intentions regarding Securities and shall immediately report any change to the plans previously communicated.

27. The Company may establish additional blackout periods for trading in Securities applicable to Covered Persons and shall immediately notify them.

28. Trading in Securities by Covered Persons during blackout periods may be exceptionally authorized by the Company's Executive Board upon written request stating the reasons for the transaction.

29. The rules under this Policy apply to: (i) transactions carried out on Market Entities, whether organized or not, and transactions carried out without the intermediation of an institution belonging to the distribution system; and (ii) securities lending transactions carried out by Covered Persons.

VII – NONCOMPLIANCE WITH THE TRADING POLICY

30. Noncompliance with the Securities Trading Policy of Neoenergia S.A. and its Subsidiaries shall be reported through the whistleblowing channel or directly to the Compliance Superintendency.

VIII – OBLIGATION TO INDEMNIFY

31. Covered Persons responsible for noncompliance with any provision of this Trading Policy shall fully and without limitation indemnify the Company and/or other Covered Persons for all losses incurred directly or indirectly as a result of such noncompliance.

IX – APPROVAL

32. This Trading Policy was approved by the Board of Directors on April 23, 2019, with effectiveness subject to publication of the commencement announcement for the secondary public offering of common shares issued by the Company, and shall remain in force for an indefinite period until otherwise resolved. Any approved amendment to the Disclosure Policy must be communicated to the CVM and the Stock Exchanges.

ANNEX I

DEFINITIONS APPLICABLE TO THE SECURITIES TRADING POLICY OF NEOENERGIA S.A.

CONTROLLING SHAREHOLDERS OR CONTROLLING SHAREHOLDER - a shareholder or group of shareholders bound by a shareholders' agreement or under common control that exercises control over the Company pursuant to Law No. 6,404/76.

EXTERNAL ADVISORS - persons who are not employees and who provide financial, legal, consulting, auditing or any other services to any Company, on their own behalf or on behalf of another person, and who, as a result, have access to Material Information.

STOCK EXCHANGES - B3 S.A. - Brasil, Bolsa, Balcão, or B3, and any other stock exchanges or organized trading markets on which the Company's Securities are admitted to trading.

COMPANY - Neoenergia S.A. and its Subsidiaries.

SUBSIDIARIES - companies controlled by Neoenergia.

AFFILIATES - companies that belong directly or indirectly to the same economic group.

CVM - Brazilian Securities and Exchange Commission.

FINANCE AND INVESTOR RELATIONS OFFICER - the Company officer appointed under the Shareholders' Agreement to perform the duties established in CVM regulations.

MARKET ENTITIES - stock exchanges or organized over-the-counter market entities on which Securities issued by the Company are or may be admitted to trading, as well as equivalent entities in other countries.

MATERIAL INFORMATION - any decision by shareholders, resolution of a general shareholders' meeting or of the Company's management bodies, or any other political-administrative, technical, business or economic-financial act or fact arising in connection with or relating to the Company's business that may materially affect: (i) the price of Securities; (ii) investors' decisions to buy, sell or hold Securities; or (iii) investors' decisions to exercise rights inherent in their status as holders of Securities. An illustrative list is contained in Article 2 of CVM Instruction 358/02.

COVERED PERSONS - the Company; its direct and indirect controlling shareholders and persons appointed by them to access Company information; executive officers; members of the Board of Directors, Fiscal Council and any other technical or advisory bodies created pursuant to the Bylaws; employees and third parties engaged by the Company; companies controlled by and/or under common control with the Company and their controlling shareholders, management, members of technical or advisory bodies, employees and engaged third parties, who have expressly adhered to the Disclosure Policy and/or Trading Policy and are required to comply with their rules.

RELATED PERSONS - (i) a spouse who is not legally or extrajudicially separated; (ii) a domestic partner; (iii) any dependent included in the person's annual income tax return; and (iv) first-degree ascendants and descendants.

DISCLOSURE POLICY - the Policy on Disclosure of Material Information and Preservation of Confidentiality of Neoenergia S.A. and its Subsidiaries.

INSTRUMENT OF ADHERENCE - a formal instrument signed by Covered Persons and acknowledged by the Company through which they acknowledge the rules contained in the Disclosure Policy, Trading Policy and CVM Instruction 358/02.

SECURITIES - for purposes of this Policy, all securities defined under Article 2 of Law 6,385/76, as amended by Law 10,303/01: I. shares, debentures and subscription warrants; II. coupons, rights, subscription receipts and split certificates relating to the securities referred to in item I; III. securities deposit certificates; IV. debenture certificates; V. units of securities investment funds or investment clubs investing in any assets,

subject to the exception in item “8”; VI. commercial paper; VII. futures, options and other derivatives whose underlying assets are securities; VIII. other derivatives, regardless of their underlying assets; and IX. when publicly offered by the Company, its subsidiaries and affiliates, any other collective investment instruments or agreements that confer participation, partnership or remuneration rights, including those arising from services, whose returns derive from the efforts of the entrepreneur or third parties.

ANNEX II

INSTRUMENT OF ADHERENCE TO THE TRADING POLICY OF NEOENERGIA S.A.

[name], [identification details], resident and domiciled in the City of [ ], State of [ ], at [address], enrolled with the CPF/MF under number [ ] and holder of identity card No. [ ], issued by [ ], in the capacity of [office, function or position] of Neoenergia S.A., hereby declare that I have read and fully understood the terms and conditions of the Trading Policy of Neoenergia S.A. and its Subsidiaries, in accordance with CVM Instruction No. 358, dated January 3, 2002, as amended, approved by the Company's Board of Directors at the meeting held on April 23, 2019. By this Instrument of Adherence, I formally adhere to the Trading Policy of Neoenergia S.A. and its Subsidiaries and undertake to comply with all its terms and conditions.

[City], [date]

_____

[Name]
[Office, Function or Position]

ANNEX III

ACQUISITION OR DISPOSAL OF AN INTEREST IN SECURITIES

I, [name], [marital status], [profession], holder of identity card No. _____, issued by _____ and enrolled with the CPF/MF under No. _____, resident and domiciled at _____, in the City of _____, State of _____, in the capacity of _____ [indicate office, function or relationship with the Company] of [Company Name], HEREBY DECLARE, in compliance with CVM Instruction No. 358/02, that I [acquired/disposed of] [quantity] [specify Security], thereby changing my interest in Securities of [Company Name], provided that it is a publicly held company, or Securities referenced thereto, to ____%, as set forth below:

Period [month/year]	Trade Date	Issuing Company	Type of Security	Total Quantity	Quantity by Type and Class	Price	Broker Used	Other Material Information

Pursuant to CVM Instruction No. 358/02, I further DECLARE that I shall report to the Finance and Investor Relations Officer of [Company Name] any change in the information provided herein by the 05th day of each month. [place and date]

_____

[Name of Declarant]
[Office]