CODE OF CONDUCT



A WORD FROM THE PRESIDENT



AXIA Energia is undergoing a period of transformation and growth, establishing itself as a company prepared to address the challenges of the energy transition and generate value sustainably. This journey is only possible because it is built on an ongoing commitment to ethics, integrity, transparency, and good governance—principles that guide our decisions, strengthen our relationships, and sustain the trust placed in our company.

This Code of Conduct translates that commitment into clear guidelines for our Professionals, Business Partners, and Third Parties when acting on behalf of, in the interest of, or for the benefit of AXIA Energia. More than a set of rules, it reflects the values that shape how we do business and the standards of behavior we expect across all our relationships.

Over the past few years, we have significantly strengthened our governance structure and Compliance Program, enhancing our mechanisms to prevent, detect, and respond to integrity risks while fostering a culture of responsibility, accountability, and continuous improvement.

These efforts are essential to the long-term viability of our business and to building trust with shareholders, investors, customers, suppliers, communities, public authorities, and society as a whole.

Each of us plays a fundamental role in preserving this culture. Acting ethically and with integrity means making the right choice every day, respecting people, protecting the environment, complying with the law, safeguarding the company's assets and reputation, and conducting our business responsibly and transparently.

I encourage everyone to become familiar with this Code, apply it in their daily work, and help ensure that AXIA Energia continues to be recognized not only for the excellence of its results but also for the integrity, responsibility, and sustainability with which it achieves them.

I hope you enjoy the read!

Ivan de Souza Monteiro
President of AXIA Energia

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1

INTRODUCTION

At AXIA Energia, ethics, integrity, and responsibility guide how we work and make decisions.

We strive to generate value sustainably, placing our values at the center of our decisions and conducting our business with transparency, in compliance with the law, and with a commitment to people, the environment, and society.

This Code of Conduct ("**Code**") translates AXIA Energia's values into principles and behaviors that define how we conduct our business, engage with our stakeholders, and put our business strategy into practice.

These guidelines provide a framework for decisions and actions in all professional situations and interactions and must be followed alongside the company's internal policies, rules, and procedures.

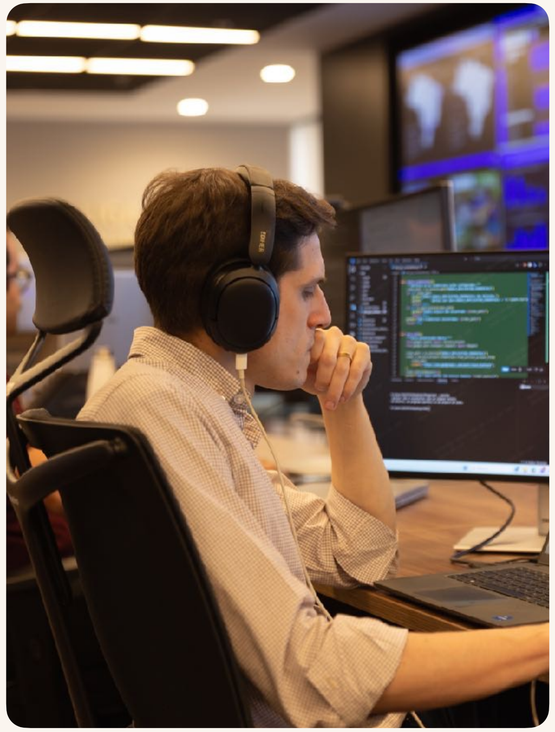
Everyone is expected to know, understand, and comply with this Code, contributing to a culture of ethics, integrity, respect, and responsibility across all activities and relationships involving AXIA Energia.

1.1

SCOPE OF APPLICATION







This Code applies to AXIA Energia and all companies directly or indirectly controlled by it.

Its guidelines are mandatory for all AXIA Energia Professionals, regardless of their position, role, or contractual relationship.

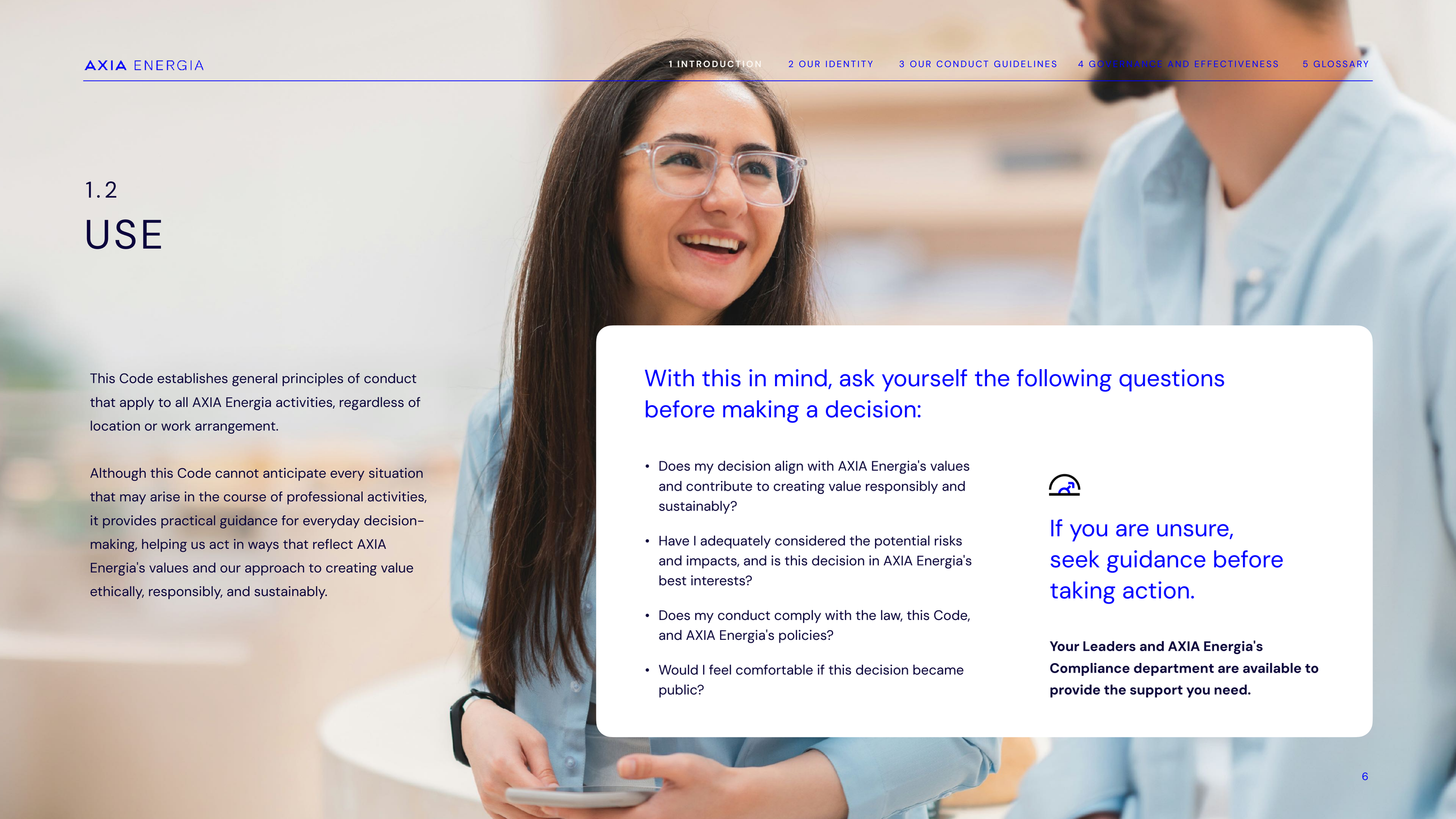
Business Partners, our Representatives in Investee Companies, and Third Parties are also expected to follow the principles set out in this Code, subject to the obligations established in their contracts, the Corporate Governance Guide, the Supplier Conduct Guide, and other applicable corporate policies.

1.2

USE

This Code establishes general principles of conduct that apply to all AXIA Energia activities, regardless of location or work arrangement.

Although this Code cannot anticipate every situation that may arise in the course of professional activities, it provides practical guidance for everyday decision-making, helping us act in ways that reflect AXIA Energia's values and our approach to creating value ethically, responsibly, and sustainably.



With this in mind, ask yourself the following questions before making a decision:

- Does my decision align with AXIA Energia's values and contribute to creating value responsibly and sustainably?
- Have I adequately considered the potential risks and impacts, and is this decision in AXIA Energia's best interests?
- Does my conduct comply with the law, this Code, and AXIA Energia's policies?
- Would I feel comfortable if this decision became public?

If you are unsure, seek guidance before taking action.

Your Leaders and AXIA Energia's Compliance department are available to provide the support you need.

1.3

RESPONSIBILITIES

Promoting an ethical culture is everyone's responsibility.

AXIA Energia's Board of Directors, through the Audit and Risk Committee, oversees the implementation and effectiveness of this Code. It also reinforces the company's commitment to high standards of ethics, integrity, transparency, and corporate governance by leading by example and fulfilling its responsibilities.

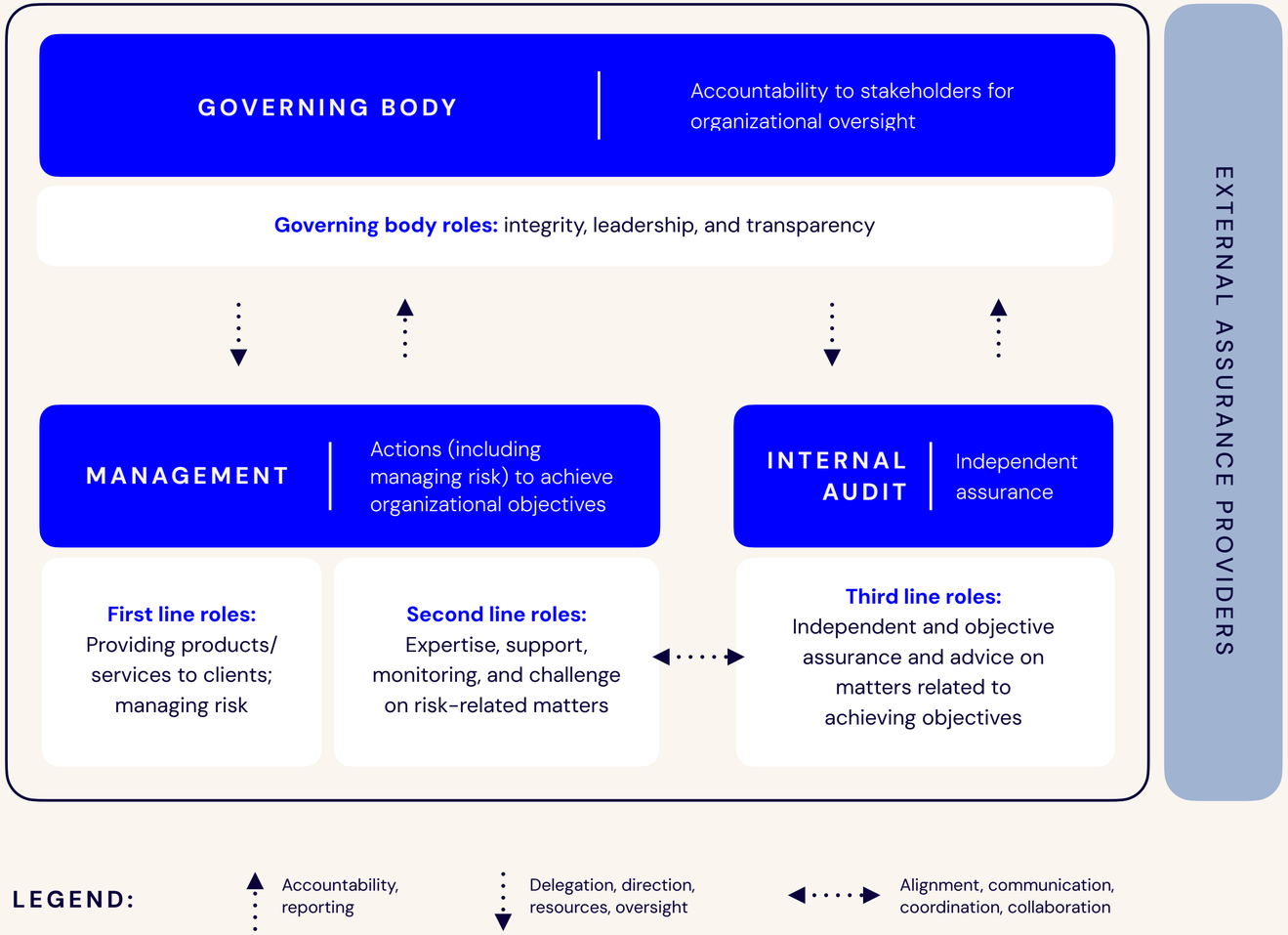
The Vice Presidency of Governance and Sustainability, through the Compliance department, is responsible for coordinating the implementation, review, dissemination, and monitoring of this Code.

The Compliance department provides annual training on the Code's guidelines to all Professionals and works closely with the Corporate Governance, Risk Management, Internal Audit, and Legal departments, as well as other control functions, to strengthen AXIA Energia's Compliance Management System.

1.3 RESPONSIBILITIES

Our corporate management structure follows the Three Lines Model developed by the Institute of Internal Auditors (IIA). This framework strengthens our ability to innovate, grow, and deliver stronger results. It also helps ensure that decisions support our long-term vision and sustainability commitments, while promoting coordination across departments and fostering collaboration that drives value creation.

The IIA's Three Lines Model



1.3 RESPONSIBILITIES

Board Members and Executive Officers, as well as Leaders, play a key role in promoting AXIA Energia's culture of ethics and integrity.

In addition to complying with this Code, they are expected to lead by example, foster an environment of trust, and encourage their teams to uphold these principles in their daily work.

They must also support their teams in making decisions, answer questions, and promptly report any potential violations they become aware of to the Compliance department or through the appropriate reporting channels.



1.3 RESPONSIBILITIES

In addition to the guidelines applicable to all Professionals,
Board Members, Executive Officers, and Leaders are expected to:

1. Lead by example and foster **an environment of trust and safety** where Professionals feel comfortable asking questions, raising concerns, and reporting potential irregularities.
2. Encourage the Professionals they supervise to understand and comply with this Code, internal policies, and applicable laws, and **to participate in training** provided by the Compliance department.
3. **Respect and uphold** every Professional's right to stop or refuse to perform an activity when they identify a serious and imminent risk to people, facilities, or the environment. Ensure that the situation is assessed and the necessary measures are taken before work resumes.
4. Guide their teams in identifying, preventing, and appropriately managing risks, answering questions, and addressing **potential violations** involving ethics and integrity.
5. Promote healthy, respectful, and psychologically safe work environments by **proactively identifying** and managing psychosocial risk factors that may affect Professionals' health, well-being, or performance.
6. Adopt management practices that **value diverse perspectives** and ensure fair, unbiased recruitment, development, and promotion processes.
7. Handle concerns and reports brought to their attention with impartiality, confidentiality, and diligence, taking appropriate action and **referring matters to the appropriate channels** when necessary.

IMPORTANT

Leaders **must not pressure Professionals** in any way to conceal incidents, approve or sign technical reports without proper verification, or disregard or relax safety rules and procedures. Tolerating or encouraging such conduct, or failing to take appropriate action in response, also constitutes a violation of this Code.

2

OUR IDENTITY

2.1

WHO WE ARE

AXIA Energia is a publicly traded company operating in the renewable energy infrastructure sector.

Beyond generating, transmitting, and trading electricity, we connect people, markets, and opportunities across Brazil, from north to south. We develop solutions that drive business growth and create sustainable value.

We combine operational excellence, innovation, effective coordination, and strategic capital allocation to transform natural resources into **clean, renewable energy solutions that contribute to the progress of our customers**, partners, communities, and society as a whole.

2.2

OUR PURPOSE







Our purpose is to catalyze business with our energy. We believe that energy goes beyond the infrastructure we operate. It also lies in our ability to anticipate change, connect stakeholders, develop solutions, and turn opportunities into shared value.

> This purpose **guides our actions and shapes how we do business**, build relationships with stakeholders, and create opportunities for the future.

2.3

OUR VALUES



LIFE COMES FIRST

We are committed to protecting life and the environment. We prioritize accident prevention at every stage and spare no effort or resources to safeguard people's health, safety, and physical well-being, as well as our assets.



INTEGRITY ALWAYS

Trust and integrity form the foundation of our relationships, both within and outside the company. Ethics, transparency, and respect guide how we interact and conduct ourselves, helping create lasting value for our business.



OUR EXCELLENCE MAKES THE DIFFERENCE

We pursue excellence with humility in everything we do, understanding that our actions contribute to the company's overall success. We acknowledge individual and collective achievements, reward merit, and celebrate them with enthusiasm.



CUSTOMER FOCUS

Staying close to those who trust our energy guides our decisions. We go beyond providing solutions to understand each customer's needs and deliver experiences that create lasting value. We believe in transparent, enduring relationships built on mutual trust, knowing that growing alongside our customers also expands our positive impact on the world.



INNOVATE TO CREATE VALUE

We embrace an entrepreneurial mindset and dare to shape the future, taking risks and learning quickly while maintaining a strategic focus. We value knowledge and encourage continuous learning as we work to meet our customers' current and future needs, drawing inspiration from them to keep innovating.



OUR ENERGY COMES FROM PEOPLE

We believe in continuous learning and sharing knowledge. We foster an engaging environment that encourages development and collaboration, where everyone has opportunities to learn, teach, and grow. We value diverse backgrounds, experiences, and perspectives as sources of innovation and competitive advantage. We promote equal opportunities and stand against all forms of discrimination, strengthening a culture of belonging where everyone can contribute authentically.

2.4

OUR INSTITUTIONAL COMMITMENTS

We believe that integrating ESG (Environmental, Social, and Governance) considerations into our business strategy strengthens our ability to innovate, create sustainable value, attract investment, and develop solutions that meet the needs of our customers and society.

This approach allows us to contribute to the energy transition and sustainable development while delivering strong economic performance and positive outcomes for our stakeholders.

We also recognize diversity, equity, and inclusion as integral to our strategic commitments. This is reflected in our management practices, how we monitor performance indicators, and our efforts to create an increasingly diverse and inclusive environment.

AXIA Energia also **supports national and international initiatives** aimed at advancing business integrity, human rights, sustainability, transparency, diversity and inclusion, and good governance.

3

OUR CONDUCT GUIDELINES

The way we conduct our business **is just as important as the results we achieve.**

Grounded in AXIA Energia's values, principles, and strategic direction, this Code sets out standards of behavior that inform our decisions, activities, and relationships.

The following guidelines reflect the company's key commitments and **provide a clear framework for everyone to act ethically, responsibly, and with integrity.**

3.1

HOW WE DO BUSINESS

Zero tolerance for corruption

Violations of Anti-Corruption Laws may result in significant civil, administrative, and criminal penalties for AXIA Energia and the individuals involved, as well as serious financial and reputational consequences in Brazil and other jurisdictions.

For this reason, AXIA Energia maintains a **zero-tolerance policy** toward corruption in both the public and private sectors. This commitment begins with the company's leadership and must be upheld by all Professionals, Business Partners, and Third Parties acting on its behalf, in its interest, or for its benefit.

We are committed to the highest standards of ethics and integrity. This means preventing, detecting, and addressing conduct that may involve fraud, corruption, or other forms of corporate misconduct.

IMPORTANT

It is strictly prohibited to directly or indirectly promise, offer, authorize, give, request, receive, or accept an **Undue Advantage** or **Anything of Value** for any of the following purposes:

- Improperly influencing a decision or action.
- Inducing someone to violate legal, professional, or fiduciary obligations.
- Obtaining, retaining, or directing business, contracts, or commercial opportunities.
- Obtaining any improper benefit for AXIA Energia or Third Parties.
- Securing preferential treatment or eliminating commercial disadvantages.

3.1 HOW WE DO BUSINESS

ZERO TOLERANCE FOR CORRUPTION

What do **Undue Advantage** and **Anything of Value** mean?

- **UNDUE ADVANTAGE** refers to any benefit, favor, privilege, gain, or advantage, whether financial or otherwise, that is offered, promised, granted, requested, or received in violation of the law or ethical standards, with the intent to improperly influence a decision or obtain preferential treatment. It may take various forms, including material, nonmaterial, moral, political, or sexual benefits.

- **ANYTHING OF VALUE** refers to any benefit, advantage, or item that holds economic or personal value for the recipient, regardless of its monetary worth. Examples include money, gifts, meals, entertainment, travel, accommodations, donations, sponsorships, business opportunities, job offers, discounts, favors, services, political contributions, and other material or nonmaterial benefits.

The prohibition above also applies to Facilitation Payments, regardless of their amount or frequency.

- **FACILITATION PAYMENTS** are payments or benefits offered to Public Officials to expedite, facilitate, or ensure the performance of routine or nondiscretionary administrative acts, such as issuing documents or authorizations or providing public services to which AXIA Energia is already entitled.

Professionals, Business Partners, and Third Parties associated with AXIA Energia must exercise particular caution when dealing with Public Officials, Politically Exposed Persons (PEPs), and related Third Parties, such as intermediaries. They must avoid conduct that could create conflicts of interest, give the appearance of improper favoritism, or violate Anti-Corruption Laws.

LEARN MORE

Compliance Policy

Risk Management and Internal Controls Policy

3.1 HOW WE DO BUSINESS

Preventing money laundering and material support for terrorism

AXIA Energia rejects money laundering, material support for terrorism, and any involvement with criminal organizations or individuals and entities subject to national or international sanctions or restrictive designations. The company takes steps to prevent such activities and relationships.

Protection payments, compulsory contributions, and any other benefits provided to criminal organizations, armed groups, or individuals and entities subject to sanctions or restrictive designations are prohibited.

IMPORTANT

Corruption, money laundering, and material support for terrorism are often interconnected.

For this reason, AXIA Energia conducts integrity checks and due diligence on Third Parties, Business Partners, and other commercial counterparties to identify risks and avoid relationships that conflict with its values or applicable laws.

Any signs or suspicions of irregularities must be reported immediately through the Reporting Channel. Examples include:

- Unusual corporate ownership structures.
- Atypical payment requests.
- Potential links to criminal organizations, sanctioned entities, or groups designated as terrorist organizations by competent authorities.
- Situations involving extortion, threats to safety or security, or other incidents that may expose the company to these risks.

3.1 HOW WE DO BUSINESS

Sanctions, embargoes, and export controls

AXIA Energia is committed to complying with all applicable laws and regulations governing economic sanctions, embargoes, export controls, and other national and international trade restrictions.

The company takes steps to identify and mitigate risks associated with transactions, operations, and business relationships involving countries, individuals, entities, or assets subject to sanctions or trade restrictions, in accordance with applicable laws and internal procedures.

Books and records

AXIA Energia maintains appropriate books, records, and internal controls to ensure that all transactions and expenses are properly authorized, recorded completely and accurately, and documented in a way that reflects their true nature and purpose.

Professionals involved in requesting, processing, approving, or recording payments and receipts must ensure that all related information is accurate and supported by appropriate documentation, including contracts, invoices, receipts, or other relevant records.

All payments made and funds received on behalf of AXIA Energia must be properly authorized, accurately recorded, and consistent with the underlying transactions.

IN PRACTICE

- Exercise due diligence to identify potential risks related to sanctions, embargoes, and export controls.
- Report any situation that may involve trade restrictions, economic sanctions, or export controls to the Compliance department.
- Consult the Compliance department in advance if you have questions about whether a transaction is permitted or what requirements apply.

3.1 HOW WE DO BUSINESS

Business Courtesies

The exchange of Business Courtesies is permitted only when it complies with applicable laws and AXIA Energia's policies and serves a legitimate business or institutional purpose. Under no circumstances may such exchanges influence, or appear to influence, business decisions or result in an Undue Advantage.

BUSINESS COURTESIES include promotional items, gifts, hospitality, meals, and invitations to corporate or entertainment events received from Third Parties or offered by AXIA Energia Professionals.

Institutional or promotional items intended to maintain business relationships or promote the company may be offered or accepted, provided they have no significant commercial value, involve no expectation of anything in return, and comply with AXIA Energia's policies.

IN PRACTICE

- Follow the rules and limits established in the company's internal policies when offering or receiving Business Courtesies.
- Exercise particular caution when interacting with Public Officials and Politically Exposed Persons (PEPs), and comply with applicable laws and AXIA Energia's internal guidelines.
- Consult the Compliance department if you are unsure whether a Business Courtesy is appropriate. Record all Business Courtesies offered or received.



LEARN MORE

Compliance Policy

Business Courtesies Guide

3.1 HOW WE DO BUSINESS

Political activities

AXIA Energia respects its Professionals' freedom of thought, expression, and political participation, recognizing that participation in political life is an individual right.

At the same time, the company maintains a politically neutral stance and does not make contributions or donations, or provide financial or material support of any kind, to political parties, candidates, election campaigns, or other political actors.

IN PRACTICE

- Express your political views in a personal capacity, without associating them with AXIA Energia.
- Respect differing opinions and everyone's right to form their own political beliefs.
- Follow AXIA Energia's rules on the use of company resources, facilities, and assets.



3.1 HOW WE DO BUSINESS

IMPORTANT

Examples of conduct contrary to this Code include:

Making contributions or donations, or providing any other form of financial or material support to political parties, candidates, election campaigns, or political actors on behalf of AXIA Energia.

Using AXIA Energia's name, brand, resources, assets, or facilities to promote or support political parties, candidates, election campaigns, or political actors.

Participating in political party demonstrations or campaigns, or engaging in political campaigning on company premises or during working hours, in violation of internal guidelines.

Using pressure, intimidation, coercion, threats, or promises of benefits to influence Professionals' political views, voting choices, or participation in political party activities (electoral harassment).

Using one's position or authority within the company to influence or attempt to influence others' political party preferences.



3.1 HOW WE DO BUSINESS

Donations and sponsorships

AXIA Energia makes private social investments, donations, and sponsorships ethically and transparently, in compliance with applicable laws. These initiatives must align with the company's purpose, values, business activities, and social and environmental responsibility strategy.

The company conducts integrity due diligence and applies objective criteria when evaluating and approving these initiatives. It also takes steps to prevent conflicts of interest, fraud, corruption, and other irregularities.

All proposals for sponsorships or private social investments must be submitted in advance to the Compliance department and the appropriate decision-making bodies for review and approval, in accordance with AXIA Energia's internal policies and procedures.



LEARN MORE

Sponsorship Policy | Social Responsibility Policy | Private Social Investment Policy

3.1 HOW WE DO BUSINESS

Fair competition

AXIA Energia recognizes free competition as essential to the development of fair and sustainable markets. The company therefore conducts its business in compliance with applicable competition laws and maintains ethical, independent, and transparent relationships with competitors, customers, suppliers, and other market participants.

We obtain market information only through lawful means and apply objective, technical, and commercial criteria when conducting business and selecting Business Partners and Third Parties.

IMPORTANT

Examples of conduct contrary to this Code include:

- **Exchanging or sharing commercially sensitive information with competitors,** including prices, costs, commercial strategies, business plans, customer information, investments, or future acquisitions.
- **Manipulating or rigging** competitive bidding or procurement processes.
- **Obtaining or using competitors' information** through unlawful or unethical means.
- **Fixing or coordinating prices,** allocating markets or customers, restricting the supply of products or services, or engaging in any other anticompetitive practices.

LEARN MORE

Compliance Policy

3.1 HOW WE DO BUSINESS

Conflicts of interest

AXIA Energia Professionals must act ethically, impartially, and transparently, always putting the company's legitimate interests first. They must avoid situations in which personal, family, or Third Party interests could influence, or appear to influence, how they perform their duties.

CONFLICTS OF INTEREST CAN ARISE IN VARIOUS SITUATIONS: personal, family, or romantic relationships; outside professional activities; investments; involvement in negotiations; or dealings with Business Partners, Third Parties, Public Officials, and Politically Exposed Persons (PEPs).

LEARN MORE

Compliance Policy

Related-Party Transactions and Conflict of Interest Management Policy

IMPORTANT

Examples of conduct contrary to this Code include:

Using one's position at AXIA Energia **to obtain personal benefits** or benefit Third Parties.

Maintaining personal relationships or private interests involving Public Officials, former Public Officials, PEPs, or former PEPs that could compromise, or appear to compromise, impartial decision-making or AXIA Energia's interests.

Influencing hiring, promotion, or selection decisions involving individuals or companies based on personal, family, or other relationships.

Engaging in outside activities that conflict with one's professional responsibilities at AXIA Energia or could compromise one's independence, job performance, or the company's reputation.

3.1 HOW WE DO BUSINESS



At AXIA Energia,
we expect everyone to:

1. Act independently and objectively when carrying out their activities.
2. Identify and promptly report any actual, potential, or apparent conflict of interest to the Compliance department.
3. Refrain from participating in decisions or negotiations in which they have conflicting interests.
4. Seek guidance from the Compliance department whenever they are unsure whether a conflict of interest exists or how to manage it.

3.1 HOW WE DO BUSINESS

Relationships with shareholders and investors

AXIA Energia maintains transparent, ethical, and responsible relationships with its shareholders and investors, based on equal treatment, timely and appropriate disclosure of information, and compliance with applicable laws and regulations.

The company seeks to create sustainable value for its shareholders through a strategy focused on organizational excellence, customer focus, responsible capital allocation, and effective risk management. To support this commitment, it exercises due care in handling material information and matters involving securities trading and related-party transactions. It also communicates its strategy, performance, and outlook transparently, helping safeguard market integrity and investor confidence.

AXIA Energia is also committed to disclosing complete, accurate, traceable, and reliable information concerning its governance, integrity, sustainability, climate-related and environmental issues, and other relevant matters, in accordance with applicable laws and the reporting standards adopted by the company.

LEARN MORE

Policy on Disclosure and Use of Material Information and Securities Trading

Related-Party Transactions and Conflict of Interest Management Policy

AXIA Energia Investor Relations Portal

IN PRACTICE

- Help ensure that information you produce or provide in the course of your work is accurate, complete, traceable, and timely, and that its integrity is maintained. This is particularly important for information intended for regulatory disclosures, financial statements, and reports covering governance, integrity, sustainability, climate-related and environmental matters, and other ESG indicators.
- Consult the relevant departments if you have questions about handling or disclosing material information.

3.1 HOW WE DO BUSINESS

Relationships with the Public Sector

AXIA Energia maintains ethical, transparent, and professional relationships with public agencies and entities, in accordance with applicable laws and its commitment to integrity.



Professionals, Business Partners, and Third Parties associated with AXIA Energia must act responsibly when dealing with the Public Sector. They must comply with applicable anti-corruption and competition laws, other legal requirements, and the company's internal procedures to ensure that these interactions are transparent and properly managed.

These guidelines apply to situations including:

1. AXIA Energia's participation in energy auctions and other public procurement processes, including activities carried out under the resulting contracts.
2. Obtaining licenses, authorizations, and permits.
3. Interacting with regulatory authorities during oversight activities and inspections.
4. Complying with tax, environmental, and regulatory obligations.

3.1 HOW WE DO BUSINESS

RELATIONSHIPS WITH THE PUBLIC SECTOR

Cooperation with authorities

AXIA Energia expects its Professionals to cooperate ethically, transparently, and promptly with the relevant authorities during investigations, inspections, audits, and other official proceedings, in accordance with applicable laws and the company's internal rules.

Information and documents must be provided in accordance with established internal procedures, while safeguarding confidential, strategic, privileged, or legally protected information.

Institutional representation

As part of its engagement with the Public Sector and energy sector entities, AXIA Energia may participate in public consultations, public hearings, industry associations and organizations, discussion forums, and other initiatives aimed at improving public policies and regulatory frameworks relevant to its activities.

Such participation must comply with applicable laws, the company's internal rules, and the principles of ethics, integrity, transparency, and good faith.

IMPORTANT

The receipt of summonses, notices, requests for information, or any other official administrative communications related to AXIA Energia's activities **must be immediately reported to the Institutional and Government Relations department**, which coordinates institutional relations with administrative authorities and the handling of such communications.

IN PRACTICE

- Act ethically, transparently, and respectfully in all interactions with Public Officials.
- Comply with AXIA Energia's internal rules governing interactions with the Public Sector.

LEARN MORE

Institutional and Government Relations Policy

Regulatory Policy

Compliance Policy

3.1 HOW WE DO BUSINESS

Relationships with customers

AXIA Energia places its customers at the center of its business strategy and believes that lasting relationships built on trust are essential to creating sustainable value.

We strive to understand our customers' needs and develop solutions that support their growth, delivering safe, high-quality services with a commitment to excellence.

Relationships with Business Partners and Third Parties

AXIA Energia recognizes that Business Partners and Third Parties play an essential role in its operations and its ability to create sustainable value. The company therefore seeks to build relationships based on trust, collaboration, and alignment with its principles of ethics and integrity.

When engaging Business Partners and Third Parties, AXIA Energia applies objective, technical, and impartial criteria, conducts integrity due diligence proportionate to the risks involved, and uses risk-based monitoring and auditing mechanisms.

IMPORTANT

In accordance with the company's internal rules, Business Partners and Third Parties must undergo integrity due diligence, and their engagement must be reviewed by the Compliance department before the business relationship is formalized.

In mergers, acquisitions, and corporate restructurings, AXIA Energia conducts integrity assessments beforehand and implements post-transaction integration measures and improvements to internal controls based on the risks identified.

IN PRACTICE

- Act ethically, respectfully, and transparently. Work diligently to find solutions that meet customers' needs and help deliver safe, efficient, and high-quality services.
- Collaborate by providing clear and accurate information.
- Work to build lasting relationships based on trust and commitment, while complying with applicable laws and the company's internal policies.

LEARN MORE

Commercialization Policy

Procurement Policy

Supplier Conduct Guide

3.1 HOW WE DO BUSINESS

Relationships with communities

AXIA Energia seeks to build transparent, respectful, and collaborative relationships **with communities, including Indigenous peoples and traditional communities,** recognizing their distinct characteristics, cultures, ways of life, values, needs, and rights.

The company promotes ongoing dialogue with communities and other stakeholders, taking their views and concerns into account in its activities. It also works to prevent and mitigate social and environmental impacts, remedy any resulting harm, and provide compensation, while contributing to the sustainable development of the areas where it operates.

IN PRACTICE

- Engage with communities ethically, respectfully, transparently, and inclusively, emphasizing dialogue and active listening. Respect cultural differences and human rights, and follow applicable internal guidelines.
- ● When planning and carrying out activities involving communities, consult and involve the departments responsible for community relations. Take each community's specific characteristics into account and follow applicable internal guidelines.



3.1 HOW WE DO BUSINESS

AXIA Energia does not tolerate conduct that could undermine communities' trust, lead to undue favoritism or conflicts of interest, involve discrimination or disrespect, violate human rights, or breach the company's commitments to integrity and sustainability. Any actual or suspected violation of these guidelines must be reported immediately through the company's Reporting Channel.



LEARN MORE

- Environmental Policy
- Communication and Engagement Policy
- Sustainability Policy
- Social Responsibility Policy
- Human Rights Policy
- Private Social Investment Policy

3.1 HOW WE DO BUSINESS

Relations with the media

AXIA Energia maintains transparent, ethical, and responsible relationships with the press and other media outlets, recognizing their role in informing the public and helping build trust within society.

The company seeks to ensure that its public communications are accurate, consistent, timely, and compliant with applicable laws, while safeguarding confidential, strategic, and legally protected information.

Only Professionals formally authorized as spokespersons may speak to the press or other media outlets or provide information on AXIA Energia's behalf. Those who have not been designated must refer requests for information or interviews to the appropriate departments and may not speak on behalf of the company.



LEARN MORE

Spokespersons Policy | Communication and Engagement Policy

3.2

HOW WE CARE FOR PEOPLE

Respect for human rights

We respect human rights in all our activities and relationships, in line with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Fundamental Conventions, and the principles of the UN Global Compact.

We treat everyone with dignity, respect, and courtesy. We value social and cultural diversity, recognize individual differences, promote equal opportunities, and foster workplace relationships built on trust, cooperation, and mutual respect.

AXIA Energia prohibits all forms of discrimination or prejudice based on social, cultural, or ethnic background; nationality; gender identity; race or skin color; age; religion; political opinion; sexual orientation; physical, psychological, or mental condition; neurodiversity; or any other characteristic.

Violence and human rights violations are also prohibited across our operations and throughout our Value Chain. This includes child labor, forced labor, slavery-like or degrading working conditions, human trafficking, and the sexual exploitation of children and adolescents.

3.2 HOW WE CARE FOR PEOPLE

AXIA Energia conducts human rights due diligence t**o identify, prevent, and mitigate actual and potential adverse impacts** associated with its activities and Value Chain. The company also takes remedial action where appropriate. AXIA Energia expects its Third Parties and Business Partners to uphold these commitments and comply with applicable human rights obligations. The company may also assess and monitor them based on the risks identified. AXIA

Energia's Value Chain includes the activities, processes, and relationships involving suppliers, partners, customers, and other stakeholders that contribute to creating, delivering, and sustaining value for the company.

We also recognize and respect freedom of association and the right to collective bargaining, and maintain open, respectful dialogue with organizations representing workers.



3.2 HOW WE CARE FOR PEOPLE

IN PRACTICE

- Treat people with respect, dignity, courtesy, and professionalism.
- Promote an inclusive, collaborative, and discrimination-free work environment.
- Respect human rights in your work and interactions with Professionals, Third Parties, Business Partners, customers, and communities.
- Report any actual or suspected human rights violations or breaches of this Code immediately through the available channels.

Culture, diversity, and inclusion

AXIA Energia recognizes that diverse perspectives, experiences, and backgrounds are essential to an inclusive, high-performing culture that strengthens decision-making, fosters innovation, and supports sustainable value creation.

We therefore seek to foster an environment where everyone is treated with respect and has opportunities to develop their potential. Our people management practices are guided by a commitment to equal opportunity throughout employees' careers, from attracting and recruiting talent to professional development and promotion. We value diverse teams and base recognition on merit and performance.

LEARN MORE

Social Responsibility Policy

Human Rights Policy



3.2 HOW WE CARE FOR PEOPLE

HOW WE CARE FOR PEOPLE

- Use objective, technical criteria in recruitment, evaluation, and promotion processes, without bias based on personal characteristics unrelated to the role.
- Value diverse perspectives in teams and business decision-making, recognizing their contribution to innovation and better outcomes.
- Help ensure compliance with the legally required employment quota for people with disabilities (PwD) and support the company's accessibility initiatives.
- Report any situations that may create barriers to equal opportunities or involve discrimination through the available channels.

IMPORTANT

Examples of conduct contrary to this Code include:

- **Favoring or disadvantaging Professionals** in recruitment, evaluation, or promotion processes based on personal characteristics unrelated to the role.
- **Using language,** making jokes, or engaging in behavior that reinforces stereotypes.
- **Ignoring or failing to report** known instances of discrimination.

LEARN MORE

People Management Policy | Sustainability Report | Management Report

3.2 HOW WE CARE FOR PEOPLE

Preventing workplace bullying and sexual harassment

AXIA Energia promotes a work environment built on respect, courtesy, collaboration, and mutual trust. We are committed to protecting our Professionals' physical and mental health and do not tolerate any form of harassment, violence, intimidation, or retaliation.

The company also promotes initiatives to support their overall health and well-being, including measures to prevent and manage psychosocial risks, promote mental health, and provide assistance when needed. Everyone is expected to help create an environment where people can express their views respectfully, collaborate, and perform their duties without coercion, threats, or abuse.

> Workplace bullying (psychological harassment)

AXIA Energia does not tolerate workplace bullying, psychological violence, or other abusive, humiliating, intimidating, or offensive conduct in the workplace.

IMPORTANT

Examples of conduct contrary to this Code include:

- Humiliating, ridiculing, embarrassing, or belittling someone, or subjecting them to unjustified criticism.
- Threatening, intimidating, or exerting abusive pressure on others.
- Deliberately isolating someone or excluding them from information, meetings, or activities necessary to perform their duties.
- Deliberately assigning excessive workloads or tasks that are impossible to complete or inappropriate for someone's role, with the intent to harm them.
- Spreading rumors or false information that could damage someone's reputation.

3.2 HOW WE CARE FOR PEOPLE

PREVENTING WORKPLACE BULLYING AND SEXUAL HARASSMENT

> Sexual harassment

AXIA Energia does not tolerate sexual harassment or any other unwanted or inappropriate conduct of a sexual nature in the workplace, regardless of the position or seniority of those involved.

Any incident of workplace bullying or sexual harassment must be reported immediately through AXIA Energia's Reporting Channel so that appropriate action can be taken.

LEARN MORE

People Management Policy

Guide to Preventing Moral and Sexual Harassment

IMPORTANT

Examples of conduct contrary to this Code include:

- Making sexual comments, jokes, insinuations, or gestures that cause embarrassment or discomfort.
- Making persistent or unwanted sexual invitations or advances.
- Engaging in physical contact of a sexual nature, whether or not it is consensual.
- Offering professional benefits or opportunities in exchange for sexual favors, or threatening adverse consequences if those favors are refused.
- Displaying, sending, or sharing images, messages, or other content of a sexual nature.

3.2 HOW WE CARE FOR PEOPLE

Valuing life

For AXIA Energia, protecting lives, preventing physical harm, ensuring the safe operation of its assets, and safeguarding the environment are non-negotiable priorities. Compliance with technical standards, Standard Operating Procedures (SOPs), Brazilian Regulatory Standards (NRs), and all other applicable regulations is essential to carrying out our activities safely.

We promote a culture of health, safety, and well-being and strive to provide our Professionals with safe, healthy, accessible, and inclusive workplaces. Our focus is on preventing accidents, illness, and environmental harm.

No operational, financial, or commercial outcome justifies putting people's lives, health, or safety at risk. In hazardous situations, protecting lives and preventing injuries must always take priority in decision-making.

> **Safety is everyone's responsibility.**
> Every Professional must take proactive steps to prevent incidents and help identify, report, and eliminate risks.



3.2 HOW WE CARE FOR PEOPLE

IN PRACTICE

- Comply with the health, safety, and environmental standards applicable to your work.
- Follow safe work practices and use the required protective equipment correctly.
- Immediately stop any activity, operation, or process if you identify a condition that poses a serious and imminent risk to people, facilities, or the environment. Professionals who stop work in good faith under this guideline will not face retaliation, penalties, or other adverse consequences.
- Consider people's different characteristics and needs, including those of Professionals with disabilities, when selecting protective equipment, signage, and other safety measures. Help foster a psychologically safe work environment in line with the company's guidelines for preventing psychosocial risks.
- Help maintain a healthy, safe, and respectful workplace, looking after your own health, safety, and well-being as well as that of others.



3.2 HOW WE CARE FOR PEOPLE

IMPORTANT

Examples of conduct contrary to this Code include:

- Taking shortcuts in operations, making unauthorized technical changes, improperly modifying safety devices, or disregarding safety rules and procedures, even to meet deadlines, reduce costs, or achieve performance targets.
- Deliberately delaying critical maintenance, falsifying inspection records, or concealing unresolved technical issues that could put people, facilities, or the environment at risk.
- Working under the influence of alcohol, illicit drugs, or other substances that impair the ability to perform one's duties safely.
- Failing to use protective equipment or comply with health and safety standards.
- Engaging in conduct that puts your own safety, the safety of others, or the environment at risk.
- Carrying weapons on AXIA Energia premises, except when legally authorized and connected to the performance of professional duties.
- Driving a company vehicle negligently, recklessly, or without the necessary driving skills.



3.2 HOW WE CARE FOR PEOPLE

AXIA Energia expects its Third Parties and Business Partners to adopt integrity and safety standards consistent with the principles and guidelines of this Code and the obligations that apply to them.

Companies contracted by AXIA Energia must ensure that personnel involved in its activities have the conditions necessary to comply with health and safety requirements. This includes ensuring that they can stop work when faced with a serious and imminent risk, without fear of retaliation, in accordance with contractual obligations and applicable regulations.

LEARN MORE

Commitments to Life

Occupational Health and Safety Policy



3.2 HOW WE CARE FOR PEOPLE

Acting with professionalism

Professionalism should guide everything we do and how we interact with others. AXIA Energia expects everyone to act responsibly, diligently, respectfully, and collaboratively, helping create a productive, ethical workplace committed to excellence.



We foster a culture that values creativity, innovation, collaboration among people with diverse perspectives, and continuous improvement. Every Professional is encouraged to contribute to AXIA Energia's development and the creation of sustainable value.

At AXIA Energia, we expect everyone to:

- Perform their duties with competence, diligence, and responsibility.
- Comply with this Code, internal policies, and applicable laws.
- Participate in training initiatives that promote a culture of ethics and integrity.
- Continuously develop their knowledge and skills.
- Act with respect, cooperation, and transparency in workplace relationships.
- Use appropriate language, maintain a professional demeanor, and dress appropriately for their work environment and professional interactions.
- Respect the company's governance structure and each Professional's responsibilities, without allowing either to prevent the reporting of concerns or irregularities in good faith.

LEARN MORE

People Management Policy

3.3

HOW WE PROTECT OUR COMPANY

Protecting AXIA Energia's reputation

AXIA Energia's reputation is built through responsible decisions, sound management practices, and the ethical conduct of every Professional.

What we say and do publicly, whether in person or online, can affect the company's image and credibility.

At AXIA Energia, we expect everyone to:

- Speak on behalf of AXIA Energia only when formally authorized.
- Refer inquiries from the media, market participants, or other external audiences to the appropriate departments.
- When expressing personal opinions, make it clear that they do not represent AXIA Energia's views.
- Use social media and corporate communication channels responsibly, respectfully, and in accordance with this Code and other applicable internal policies.

3.3 HOW WE PROTECT OUR COMPANY

IMPORTANT

Examples of conduct contrary to this Code include:

Making offensive remarks about or damaging the reputation of AXIA Energia, its Professionals, Business Partners, or Third Parties with whom it interacts.

Using AXIA Energia's name, brand, premises, resources, or one's affiliation with the company for personal, commercial, political, or religious purposes.

Creating or distributing unlawful or offensive content, or material that violates the rights of Third Parties.

LEARN MORE

Communication and Engagement Policy

Spokespersons Policy



3.3 HOW WE PROTECT OUR COMPANY

Protecting corporate assets and information

> AXIA Energia's assets

AXIA Energia's assets are essential to its operations and must be used responsibly and solely for business purposes.

These include facilities, equipment, systems, financial resources, information, documents, databases, intellectual property, technologies, the company's brand, and other physical and digital assets.

Everyone covered by this Code is responsible for protecting these resources from loss, damage, waste, misuse, fraud, theft, robbery, misappropriation, and unauthorized access. They must also prevent any use that conflicts with AXIA Energia's interests or internal rules.

IMPORTANT

Examples of conduct contrary to this Code include:

Using AXIA Energia's assets for personal purposes or in ways inconsistent with their intended use.

Damaging, misappropriating, selling, or making company assets available to others without proper authorization.

Committing fraud or engaging in other conduct that could cause financial, operational, or reputational harm to AXIA Energia.

3.3 HOW WE PROTECT OUR COMPANY

PROTECTING CORPORATE ASSETS AND INFORMATION

> Personal data and privacy

AXIA Energia recognizes the importance of protecting privacy and personal data in all its activities. The company is committed to complying with applicable laws, particularly Brazil's General Data Protection Law (Law No. 13,709/2018, LGPD).

AXIA Energia implements technical, administrative, and organizational measures to safeguard the personal data of its Professionals, Third Parties, Business Partners, and other data subjects. The company ensures that this information is handled ethically, securely, and transparently, in accordance with the purposes for which it was collected.

IN PRACTICE

Everyone must process personal data only as necessary to perform their duties and in accordance with applicable laws, internal policies, and AXIA Energia's guidelines. They must also take the necessary measures to prevent unauthorized access, loss, alteration, disclosure, or any other form of improper processing.

LEARN MORE

Personal Data Protection and Privacy Policy



3.3 HOW WE PROTECT OUR COMPANY

PROTECTING CORPORATE ASSETS AND INFORMATION

> Corporate information

AXIA Energia's information is among its most valuable assets. It must be protected throughout its lifecycle, from creation and use through storage, retention, and disposal, to preserve its confidentiality, integrity, and availability and ensure its proper use, in accordance with applicable laws and the company's internal policies.

Everyone covered by this Code must use company information ethically and solely for work-related purposes, complying with information classification rules, established access levels, and applicable confidentiality obligations.

Confidential and strategic information may be accessed or shared only by authorized individuals and for legitimate purposes related to AXIA Energia's activities.

IMPORTANT

Examples of conduct contrary to this Code include:

- Disclosing, sharing, or using corporate, confidential, or privileged information for personal gain or to benefit Third Parties.
- Sharing access credentials, passwords, or other authentication methods that are personal and nontransferable.
- Improperly altering, concealing, destroying, or disposing of documents, records, or information, or failing to preserve them when required by applicable laws, internal policies, or for audits, investigations, or judicial, administrative, or arbitration proceedings.
- Disclosing studies, research, expert opinions, or other work containing AXIA Energia information without authorization from the appropriate departments.

LEARN MORE

Corporate Document and Information Management Policy | Information Security Policy

3.3 HOW WE PROTECT OUR COMPANY

PROTECTING CORPORATE ASSETS AND INFORMATION

> Insider trading

AXIA Energia is committed to transparency, the integrity of capital markets, and compliance with applicable laws and regulations.

Anyone with access to Privileged Information must keep it confidential and strictly comply with the rules governing its disclosure and use.

It is prohibited to use Privileged Information to trade securities, advise Third Parties to make trades, or disclose it to anyone who could use it to obtain an Undue Advantage.

If there is any uncertainty about how to handle material information, disclose it to the market, or trade securities, the Investor Relations department must be consulted in advance.

Cybersecurity

AXIA Energia takes steps to protect its systems, networks, equipment, and information from unauthorized access, cyberattacks, data loss, and other incidents that could disrupt business operations, compromise the security of its assets, or undermine stakeholder trust.



Protecting the company's digital environment is everyone's responsibility. Every Professional must use AXIA Energia's technology resources securely and in accordance with internal policies to help prevent information security incidents.

At AXIA Energia, we expect everyone to:

- Use AXIA Energia's systems, equipment, corporate accounts, and other technology resources responsibly and only for authorized purposes.
- Protect their access credentials, keeping passwords and other authentication information confidential and for their own use only.
- Follow AXIA Energia's security requirements when accessing company systems and information.
- Immediately report any actual or suspected cybersecurity incidents, attempted fraud, unauthorized access, lost devices, or other situations that could compromise the security of AXIA Energia's information or systems.

3.3 HOW WE PROTECT OUR COMPANY

IMPORTANT

Examples of conduct contrary to this Code include:

Installing or using software, equipment, services, or other technology tools without AXIA Energia's authorization.

Disabling or bypassing the company's security controls.

LEARN MORE

Policy on the Disclosure and Use of Material Information and Securities Trading

Information Security Policy



3.3 HOW WE PROTECT OUR COMPANY

Responsible use of artificial intelligence (AI)

AXIA Energia encourages the responsible use of innovative technologies, including AI tools, to improve efficiency, drive innovation, and enhance business processes. These technologies must be used ethically, securely, and in compliance with applicable laws and internal policies.

Only AI solutions authorized by AXIA Energia may be used, and their use must comply with the company's guidelines on information security, data protection, intellectual property, confidentiality, and risk management.

AI-generated outputs **must be critically reviewed by the Professionals responsible for using them.** Before relying on these outputs, they must verify their accuracy, reliability, suitability for the intended purpose, and compliance with applicable laws and AXIA Energia's ethical standards.



3.3 HOW WE PROTECT OUR COMPANY

IMPORTANT

The use of AI tools is prohibited for the following purposes:

Entering confidential, strategic, personal, or otherwise protected information into AI platforms not authorized by AXIA Energia, or sharing it through those platforms.

Making automated decisions that significantly affect people or the business without appropriate controls and oversight.

Using AI to replace professional judgment or make decisions that require human analysis.

Violating intellectual property rights, privacy rights, contractual confidentiality obligations, or applicable laws.

Generating or distributing false, misleading, discriminatory, offensive, or otherwise inappropriate content that conflicts with AXIA Energia's values and principles.

Failing to report incidents, vulnerabilities, or risks identified in AI systems or applications.



3.4

OUR COMMITMENT TO THE ENVIRONMENT



AXIA Energia believes that creating sustainable value depends on integrating innovation, operational performance, social and environmental responsibility, and dialogue with stakeholders.

We therefore seek to conduct our activities responsibly, balancing business development with environmental protection, the sustainable use of natural resources, and respect for communities affected by our operations.

We comply with applicable environmental laws, the conditions of our environmental licenses, and the principles of prevention, precaution, and sustainable development.

We promote environmental education and raise awareness among our Professionals and stakeholders, encouraging practices that help protect the environment and continuously improve our social and environmental performance.

3.4 OUR COMMITMENT TO THE ENVIRONMENT



> With an energy portfolio made up entirely of clean and renewable sources, **we seek to identify risks and opportunities related to climate change**, support climate adaptation, strengthen the resilience of our assets and operations, and contribute to the transition to a low-carbon economy.

We also work to protect biodiversity and ecosystems, manage water resources and waste generated by our activities responsibly, **promote circular economy practices, and ensure the safety of our dams.**

3.4 OUR COMMITMENT TO THE ENVIRONMENT

IN PRACTICE

- Comply with environmental laws and AXIA Energia's internal policies.
- Use natural resources responsibly, reduce waste generation, and promote the efficient use of water, energy, and materials.
- Exercise due diligence to ensure that materials and other goods used by the company are sourced legally and in compliance with applicable laws.
- Identify, prevent, and report situations that could cause adverse social and environmental impacts, and take appropriate action when necessary.
- Promote initiatives to address climate change and protect biodiversity, water resources, and natural heritage.
- Respect local communities and the historical and cultural heritage of the areas where AXIA Energia operates.
- When working in the field, respect the environment, nearby properties, and local communities. Follow the terms of applicable authorizations and relevant procedures, and avoid unnecessary or unauthorized disturbance of wildlife, vegetation, or the sites visited.
- Contribute to the continuous improvement of AXIA Energia's environmental performance.

LEARN MORE

Environmental Policy

Biodiversity Policy

Climate Strategy Policy

Water Resources Policy

Dam Safety Policy

Sustainability Policy

4

GOVERNANCE AND EFFECTIVENESS

4.1 COMMITMENT

Everyone covered by this Code is responsible for understanding and following its guidelines and upholding its principles and values.

Adherence to this Code must be formally confirmed by signing the Acknowledgment and Commitment Statement when joining the company, entering into a contract, or whenever the Code is significantly updated.

4.2

QUESTIONS AND FEEDBACK

This Code and the other policies that form part of the Compliance Program are available to Professionals on the intranet and to other stakeholders on AXIA Energia's website, in the “ESG – Compliance Program” section. The Code is also available in other languages, as appropriate, and in accessible formats for people with disabilities.

AXIA Energia encourages Professionals and other stakeholders to seek guidance from the Compliance department whenever they have questions about how to interpret or apply this Code, internal policies, or applicable laws.

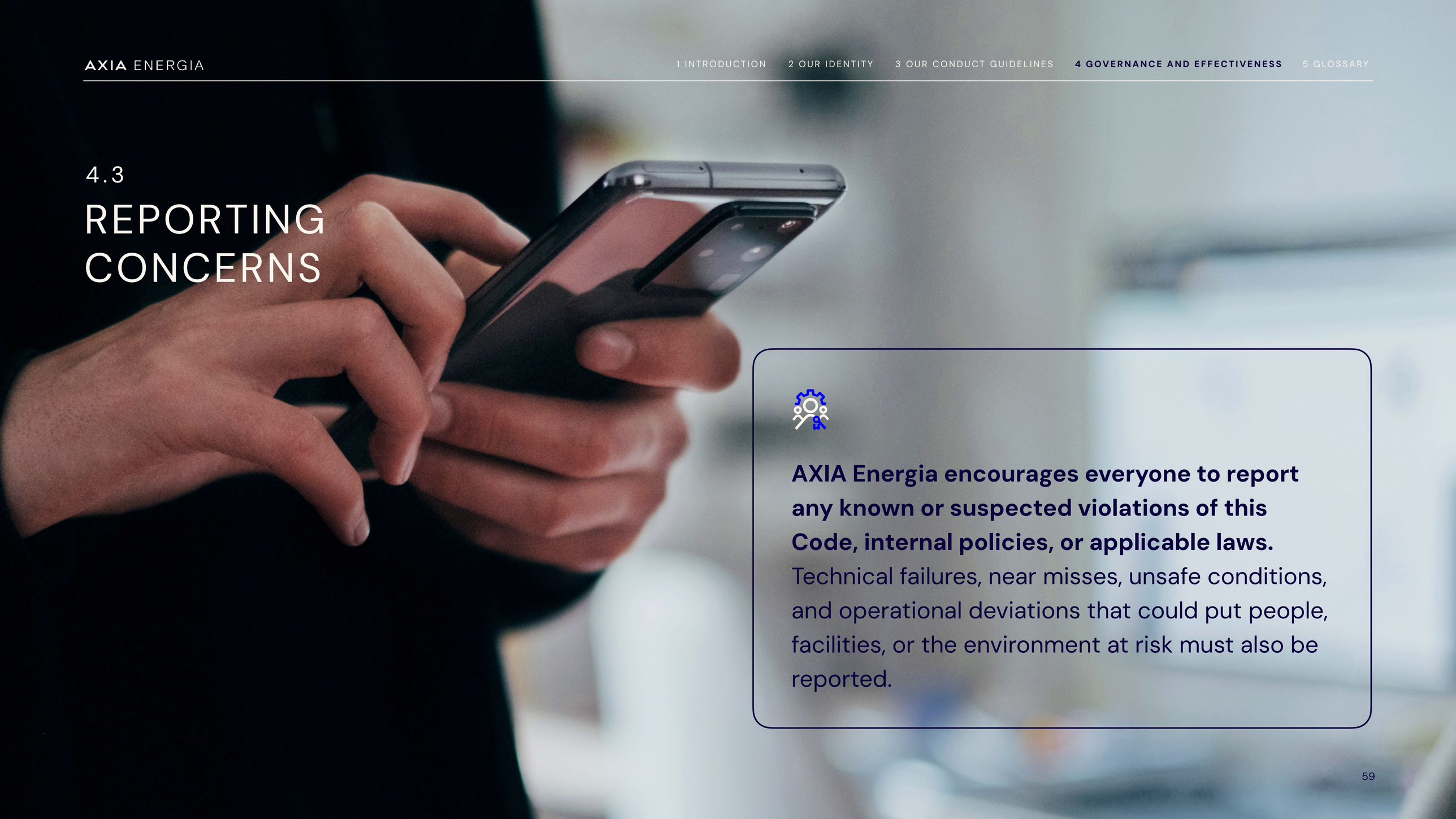
The company also provides an Ombudsman Channel for complaints, suggestions, compliments, and other feedback related to its activities. All submissions are handled appropriately and confidentially, in accordance with applicable laws and the company's internal rules.

Ombudsman Channel

WEBSITE
axia.com.br/canaldeouvidoria

WHATSAPP
(11) 5039-6534
Available 24 hours a day, 7 days a week.

PHONE
0800 721 3275
Available Monday through Friday, from 8 a.m. to 8 p.m.



4.3

REPORTING CONCERNS

AXIA Energia encourages everyone to report any known or suspected violations of this Code, internal policies, or applicable laws. Technical failures, near misses, unsafe conditions, and operational deviations that could put people, facilities, or the environment at risk must also be reported.

4.3 REPORTING CONCERNS

To support this commitment, AXIA Energia provides an independent, externally operated Reporting Channel through which Professionals and other stakeholders can submit reports anonymously or identify themselves. Reports may involve fraud, corruption, conflicts of interest, harassment, discrimination, environmental violations, or any other conduct that violates applicable laws, this Code, or AXIA Energia's internal policies.

AXIA Energia does not tolerate any form of retaliation against individuals who, in good faith, submit reports, provide information, or cooperate with internal investigations.

LEARN MORE

Reporting Guide

Examples of retaliation include: threats, intimidation, discrimination, harassment, demotion, unjustified changes to working conditions that adversely affect an individual, or termination of employment in response to a report or cooperation with an investigation.

Retaliating, attempting to retaliate, or encouraging others to do so constitutes a violation of this Code. Knowingly submitting false reports or providing false information is also prohibited, and those responsible will be subject to appropriate measures.

Ombudsman Channel

WEBSITE
axia.com.br/canaldeouvidoria

WHATSAPP
(11) 5039-6534
Available 24 hours a day, 7 days a week.

PHONE
0800 721 3275
Available Monday through Friday, from 8 a.m. to 8 p.m.

4.4

VIOLATIONS AND CONSEQUENCES

AXIA Energia investigates alleged violations of this Code, internal policies, or applicable laws independently, impartially, and confidentially, in accordance with its internal procedures.

Investigations are conducted by the Compliance department, which may take the necessary steps to establish the facts while protecting confidential information, the integrity of the process, and the rights of those involved.

IMPORTANT

Confirmed violations may result in disciplinary action or other appropriate measures, depending on the nature and severity of the conduct. These may include **warnings, suspension, or termination of employment. Applicable civil, administrative, or criminal penalties** may also apply. These measures apply to all AXIA Energia Professionals, including Board Members, Executive Officers, and Leaders, regardless of their duties, responsibilities, or position within the organization.

LEARN MORE

Compliance Policy

AXIA Energia's Disciplinary Committee, comprising representatives from the Compliance, People Management, and Legal departments, is responsible for reviewing cases and determining appropriate disciplinary measures for Professionals, based on investigation reports or substantiated requests from Leaders. This does not relieve those who manage teams of their responsibility to take the necessary steps to maintain an ethical work environment, with support from the People Management department.

Violations involving Business Partners or Third Parties may result in the suspension or blocking of their registration, interruption of activities, contract termination, contractual penalties, or other appropriate measures, depending on the circumstances and in accordance with applicable contracts and internal rules.

In addition to holding those involved accountable, AXIA Energia may take corrective action to strengthen its internal controls, processes, policies, and training programs and prevent similar incidents from recurring. The company may also report the matter to the appropriate authorities when warranted.

4.5
PERIODIC REVIEW

This Code is reviewed as needed to reflect changes in legislation, governance and compliance best practices, the regulatory environment, and AXIA Energia's activities, with no more than five years between reviews.

Additional updates may be made at any time in response to legislative, regulatory, organizational, or operational changes.

The current version of this Code is available through all of AXIA Energia's official channels.

4.6
APPROVAL



This version of the Code was approved by AXIA Energia's Executive Board Resolution No. 442, dated September 15, 2026, and Board of Directors Decision No. 157, dated September 24, 2026.

4.7
ACKNOWLEDGMENT AND COMMITMENT STATEMENT

Confirm your commitment to following the principles and guidelines of this Code and AXIA Energia's standards of conduct through the Compliance Management Platform.

5

GLOSSARY

Public Official

Any person who holds a public mandate, office, position, employment, or function, even temporarily or without remuneration, in a body or entity of the direct or indirect public administration, whether in Brazil or abroad. This includes individuals serving through election, appointment, designation, hiring, or any other means of assuming such a role or becoming affiliated with a public entity, including state-owned enterprises, entities controlled by public authorities, diplomatic missions, and international public organizations.

Board Members and Executive Officers

All members of AXIA Energia's Board of Directors, as well as its President and Vice Presidents.

Anti-Corruption Laws

Any Brazilian or foreign laws and regulations applicable to AXIA Energia's activities that aim to prevent and combat corruption and other unlawful practices. These include Law No. 12,846/2013 (Brazilian Anti-Corruption Law), the Brazilian Penal Code, Law No. 9,613/1998 (Money Laundering Law), Law No. 12,529/2011 (Competition Law), Law No. 8,429/1992 (Administrative Misconduct Law, as amended), Law No. 14,133/2021 (Public Procurement and Administrative Contracts Law), Law No. 12,813/2013 (Conflict of Interest Law), the U.S. Foreign Corrupt Practices Act (FCPA), and the UK Bribery Act (UKBA), as well as any laws or regulations that amend or replace them.

5 GLOSSARY

Leaders

All non-statutory directors, managers, executive managers, and other management personnel within AXIA Energia's organizational structure.

Business Partners

Any legal entity with which AXIA Energia maintains or intends to establish a commercial, strategic, corporate, or operational relationship, excluding Third Parties that provide services on the company's behalf.

Politically Exposed Person (PEP)

Any person who currently holds or has held, within the past five (5) years, a prominent public office, position, employment, or function in Brazil or abroad.

The definition also covers their family members, representatives, and close associates, as defined under applicable anti-money laundering regulations, including COAF Resolution No. 40/2021 or any regulation that replaces it.

Professionals

All Board Members and Executive Officers, Leaders, employees, interns, apprentices, service providers, and other individuals working for AXIA Energia.

Public Authorities

Bodies and entities that form part of the direct or indirect Public Administration at the federal, state, Federal District, or municipal level, as well as foreign public authorities and entities, where applicable.

Representatives in Investee Companies

Professionals qualified to serve on the collegiate governance bodies of subsidiaries, affiliated companies, and Special Purpose Entities (SPEs) in which AXIA Energia or its companies hold an equity interest, as well as associations and foundations linked to AXIA Energia companies. Their role is to protect the interests of shareholders and members and ensure the long-term viability of the entities they represent.

Third Parties

Any individual or legal entity that supplies goods or services to AXIA Energia or acts on its behalf, in its interest, or for its benefit. This includes distributors, intermediaries, sales representatives, document processing agents, consultants, lawyers, suppliers, operational partners, and other individuals or entities that fall within this definition.

AXIA ENERGIA