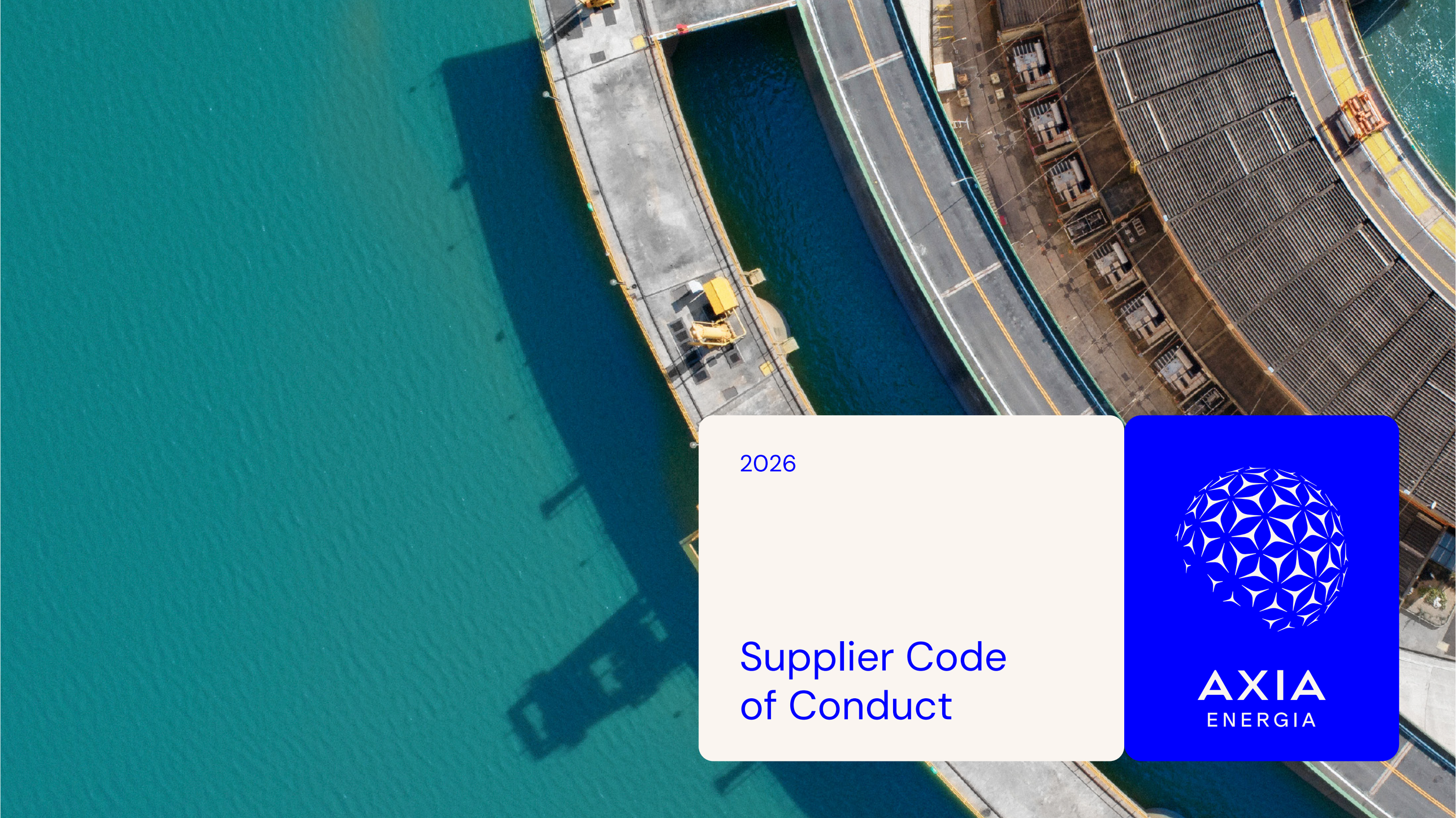


2026

Supplier Code of Conduct

AXIA ENERGIA

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1 – INITIAL CONSIDERATIONS

01

AXIA Energia recognizes that suppliers, service providers, subcontractors, and other business partners play an essential role in generating value and ensuring the sustainability of its operations.

As such, it expects its business relationships to be conducted with integrity, transparency, safety, social and environmental responsibility, and legal compliance.

02

This Guide sets out the principles and guidelines that govern the conduct of all suppliers, service providers, subcontractors, business partners, and other third parties acting on behalf of AXIA Energia or providing goods and services to the company throughout the entire commercial relationship lifecycle — from registration and contracting through execution, monitoring, and contract termination.

03

Compliance with this Guide is mandatory. It supplements the provisions set out in contracts, internal policies, and other regulatory documents of AXIA Energia. Acknowledgment and express acceptance of this Guide are conditions for qualification, contracting, contract renewal, or registration maintenance, and it may be incorporated into applicable contractual instruments.

2 – GENERAL PRINCIPLES AND EXPECTATIONS OF AXIA ENERGIA

The principles established in this Guide govern the expected conduct of AXIA Energia's suppliers throughout the entire commercial relationship and must be observed in a manner consistent with applicable legislation, the risks involved, and the company's commitments to integrity, safety, sustainability, and corporate responsibility.

The guidelines in this Guide are aligned with internationally recognized principles and standards applicable to responsible business conduct, including those relating to human rights, labor, integrity, health and safety, the environment, and due diligence in the value chain.

- Comply with the legislation applicable to their activities;
- Act with integrity, good faith, transparency, and accountability;
- Prevent, identify, assess, and address risks related to their operations and supply chain;
- Respect human rights and ensure decent working conditions;
- Adopt appropriate occupational health and safety practices;
- Protect personal data, confidential information, and AXIA Energia's assets;
- Act with environmental responsibility and promote the conscious use of natural resources;
- Ensure that their employees, representatives, agents, subcontractors, and other relevant third parties under their management are aware of and comply with guidelines consistent with this Guide, promoting its application throughout the value chain where applicable.



2 – GENERAL PRINCIPLES AND EXPECTATIONS OF AXIA ENERGIA

The supplier is responsible for ensuring that its own conduct and that of any third parties it engages does not compromise AXIA Energia's reputation, compliance, safety, operational continuity, or ESG commitments.

Suppliers must be familiar with and observe AXIA Energia's Code of Conduct and Compliance Policies, as well as its Environmental, Social Responsibility, and Sustainability Policy, all of which are available through its official channels.



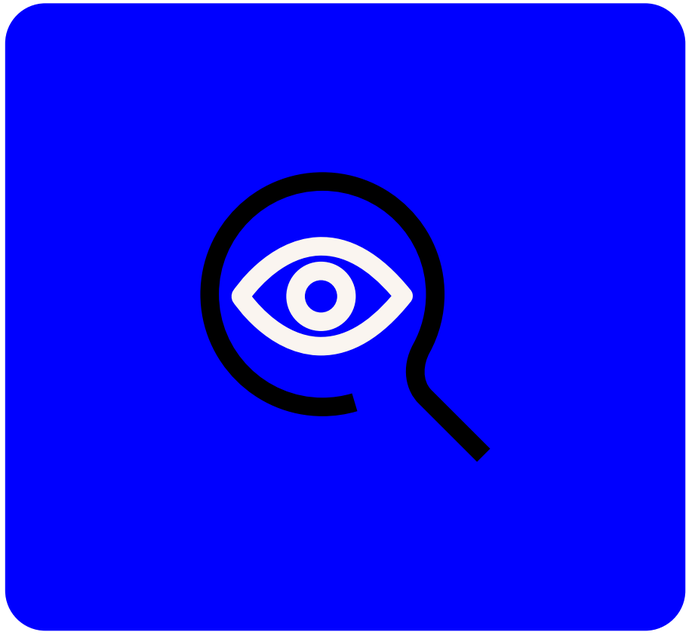
3 - GOVERNANCE AND INTEGRITY

3.1 Compliance, Ethics, and Anti-Corruption

Suppliers must conduct their business with ethics, integrity, transparency, and compliance with applicable legislation, including anti-corruption and anti-bribery laws, as well as AXIA Energia's Compliance Policy and other applicable corporate integrity guidelines governing the commercial relationship.

Practices involving fraud, corruption, bribery, facilitation payments, offering or receiving undue advantages, undisclosed conflicts of interest, and any conduct that undermines the integrity of the relationship with AXIA Energia are strictly prohibited.

Suppliers must maintain internal procedures and controls commensurate with the risks of their activities and cooperate with verifications, audits, investigations, and requests for information related to integrity and compliance.



3 - GOVERNANCE AND INTEGRITY

➢ **In this context, the supplier must:**

Maintain complete, accurate, thorough, and reliable books, records, data, and documents, with any omission, falsification, improper destruction, or distortion of material information strictly prohibited;

Operate in compliance with fair competition rules, with anti-competitive practices, improper arrangements, unlawful exchanges of sensitive information, and any conduct that undermines the integrity of competitive processes strictly prohibited;

Not offer, promise, give, authorize, request, or receive any undue advantage, directly or through third parties, with the intent of influencing the decision of a public official, employee, representative, or third party connected to AXIA Energia;

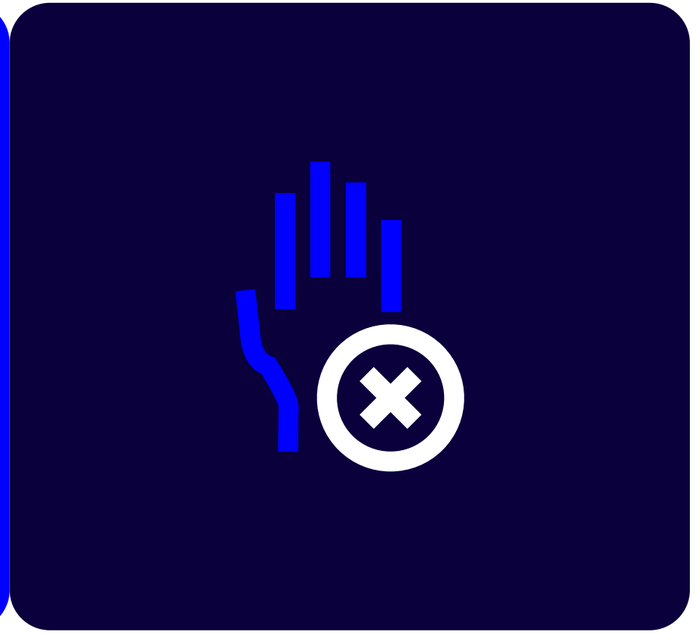
Not use intermediaries, consultants, representatives, subcontractors, or any third parties to engage in conduct that would be prohibited if carried out directly;

Not seek improper access to non-public information belonging to AXIA Energia, nor use privileged, confidential, or restricted information in a manner inconsistent with applicable legislation, contracts, or this Guide;

Promptly notify AXIA Energia of any indication or occurrence of a violation related to fraud, corruption, bribery, conflicts of interest, unfair competition, or manipulation of records and documents, without prejudice to the use of applicable whistleblowing channels.

3 - GOVERNANCE AND INTEGRITY

Any act of fraud, corruption, or integrity-related misconduct may subject the supplier — depending on the severity of the case and in accordance with the applicable contractual and regulatory instruments — to measures taken by AXIA Energia, including **suspension of registration**, contract termination under the compliance termination clause, and referral to the competent authorities, where applicable.



3 – GOVERNANCE AND INTEGRITY

3.2 Privacy and personal data protection

Suppliers must handle personal data in compliance with applicable legislation, including the General Personal Data Protection Law (LGPD), adopting appropriate measures to ensure its protection and prevent incidents.

IN THIS CONTEXT, THE SUPPLIER MUST:

- Process data only for legitimate, specific purposes that are compatible with the activities carried out for AXIA Energia, in accordance with applicable legal bases;
- Limit data processing and access to the minimum necessary for the performance of authorized activities;
- Adopt technical and administrative measures capable of protecting data against loss, improper destruction, unauthorized access, misuse, alteration, or inappropriate disclosure;
- Not disclose, share, or transfer data outside the legally permitted, contractually authorized, or formally instructed circumstances by AXIA Energia, where applicable;
- Immediately notify AXIA Energia of any data breach or non-compliance related to privacy and data protection of which it becomes aware;
- Cooperate with AXIA Energia in the investigation, mitigation, and handling of incidents and non-conformities related to privacy and data protection.

4 – HUMAN RIGHTS, LABOR, AND OCCUPATIONAL HEALTH AND SAFETY

4.1 Human rights and working conditions

AXIA Energia expects suppliers to respect internationally recognized human rights and to ensure dignified, safe, and legally compliant working conditions in their operations and, where applicable, throughout their value chain.

IN THIS CONTEXT, SUPPLIERS MUST:

- Respect and promote human rights in their operations and, where applicable, throughout their value chain;
- Identify, prevent, mitigate, cease, and remedy adverse human rights impacts;
- Not use child labor, forced labor, degrading, involuntary, or slave-like labor;
- Not tolerate human trafficking or any form of sexual exploitation of children and adolescents;
- Ensure freedom of professional or trade union association and respect rights related to collective bargaining;
- Promote a dignified, respectful work environment free from discrimination, harassment, intimidation, coercion, and violence;
- Respect and value diversity, promoting equal opportunities and accessibility, in accordance with applicable legislation;
- Comply, where applicable, with legal requirements related to the inclusion of people with disabilities, rehabilitated beneficiaries, and other potentially vulnerable groups;

4 – HUMAN RIGHTS, LABOR, AND OCCUPATIONAL HEALTH AND SAFETY

4.1 Human rights and working conditions

- Ensure dignified working conditions, including regarding working hours, rest, remuneration, benefits, hygiene, food, accommodation, and transportation, where applicable;
- Comply with labor legislation, applicable collective agreements, and relevant contractual obligations;
- Clearly communicate the composition of remuneration and benefits;
- Not carry out improper wage deductions or abusive practices;
- Maintain appropriate mechanisms for receiving, investigating, and handling complaints and grievances, including the possibility of anonymous reporting where legally permissible;
- Inform their employees, representatives, and subcontractors about the channels made available by AXIA Energia and ensure that good-faith reports can be made without retaliation;
- Adopt mitigation, remediation, and recurrence prevention measures when adverse impacts are identified;
- Establish compatible guidelines for their own suppliers, considering the risks within their value chain.

4 – HUMAN RIGHTS, LABOR, AND OCCUPATIONAL HEALTH AND SAFETY

4.2 Occupational health and safety

AXIA Energia requires all suppliers and their subcontractors to adopt and maintain occupational health and safety practices consistent with applicable legislation, the risks of the activities performed, and the requirements defined by the company.

IN THIS CONTEXT, SUPPLIERS MUST:

- Promote a culture of accident and occupational disease prevention;
- Comply with applicable legislation, contractual requirements, and AXIA Energia's health and safety guidelines;
- Ensure that subcontractors also meet equivalent requirements;
- Guarantee the right to refuse work in situations of serious and imminent risk;
- Continuously identify, assess, control, and review health and safety risks;
- Carry out risk planning and analysis before activities begin;
- Ensure that all workers have valid occupational medical examinations compatible with the activities performed;
- Adopt specific controls for critical activities, including work permits, where applicable;

4.2 Occupational health and safety

- Ensure that in-house professionals and subcontractors are qualified, trained, and formally authorized to carry out their activities;
- Conduct onboarding and training consistent with the risks involved;
- Restrict the performance of critical activities to qualified individuals;
- Provide PPE (Personal Protective Equipment), collective protective equipment (CPE), tools, vehicles, equipment, and facilities compatible with the identified risks;
- Carry out periodic inspections and maintenance to ensure safe operating conditions;
- Adopt appropriate procedures for emergency response, first aid, and initial care, drills, and training;
- Promptly report relevant health and safety occurrences to AXIA Energia;
- Monitor and report health and safety performance indicators, information, and evidence whenever requested by AXIA;
- Investigate incidents, accidents, near misses, and deviations, defining preventive and corrective measures;
- Maintain records and evidence necessary to verify compliance;
- Ensure the sharing and application of lessons learned from incidents and deviations, with a view to preventing recurrence;
- Cooperate with inspections, audits, and oversight activities conducted by AXIA Energia.

5 – ENVIRONMENT

5.1 Environmental management and compliance

AXIA Energia expects suppliers to operate in compliance with applicable environmental legislation and to adopt practices consistent with the prevention of environmental impacts, the responsible use of natural resources, and the sustainability of their operations.

- Maintain applicable environmental licenses, authorizations, and registrations, keeping them valid and up to date;
- Act in a manner that prevents, mitigates, and controls environmental impacts arising from their activities;
- Promote the efficient use of natural resources, energy, and water, in a manner consistent with the nature of their operations;
- Maintain adequate mechanisms for managing environmental risks and incidents;
- Promptly notify AXIA Energia of environmental incidents, fines, embargoes, spills, contaminations, sanctions, or events that may affect environmental compliance, reputation, local communities, or the continuity of operations related to the contracted scope.

5 – ENVIRONMENT

5.2 Climate, natural resources and circularity

- Identify, measure and take steps to reduce or eliminate greenhouse gas emissions from scopes 1, 2 and 3, air pollutants and gases covered by the Montreal Protocol, preparing and disclosing an emissions inventory in accordance with the GHG Protocol guidelines, where applicable;
- Take steps to reduce resource consumption, including electricity, and prioritize the use of renewable energy whenever possible;
- Prioritize recycled, recyclable and lower-environmental-impact goods and materials whenever technically and economically feasible;
- Develop practices focused on circularity, reuse, recycling and reduction of resource consumption;
- Develop, where applicable, life cycle assessments, including water and carbon footprint analyses, to identify the environmental impacts of products, processes, systems or functions throughout their life cycle;
- Maintain environmental performance reporting mechanisms, including, where applicable, emissions, energy consumption, water consumption, waste generation and disposal, when requested by AXIA Energia.

5 – ENVIRONMENT

5.3 Waste, hazardous substances and pollution prevention

- Identify, segregate, store, transport and dispose of waste in an environmentally appropriate manner and in compliance with applicable legislation;
- Promote the reduction or elimination of waste at the source, including through process review, conservation, substitution, reuse and recycling of materials, where applicable;
- Maintain, where applicable, a waste management plan and evidence of proper final disposal;
- Identify and control hazardous substances to ensure their safe handling, transport, storage, use, labeling, recycling, reuse and disposal, in compliance with applicable legislation;
- Take steps to prevent spills, contamination and other forms of pollution;
- Promote, where applicable, the reduction or elimination of toxic, radioactive and polluting products, with appropriate final disposal.

5 – ENVIRONMENT

5.4 Biodiversity, value chain and environmental awareness

- Consider, where applicable, impacts and dependencies related to biodiversity, land use and ecosystem conservation, aiming to reduce biodiversity loss and contribute to the conservation of land, fauna and flora;
- Adopt practices that help prevent illegal deforestation and irregular use of forest resources;
- Use timber and by-products with forest certification and maintain relevant supporting documentation, where applicable or requested by AXIA Energia;
- Promote environmental awareness and education among employees and, where appropriate, among suppliers;
- Establish compatible environmental guidelines for the supply chain, considering the relevant risks and impacts of its activities.

6 – INFORMATION SECURITY

AXIA Energia expects suppliers with access to the company's information, data, systems or environments, or whose activities may impact information security, privacy or service continuity, to adopt controls commensurate with the risks involved. These controls must consider the nature of the services provided, the level of access granted and the criticality of the contracted scope. For critical or strategic suppliers, additional requirements may be established.

6.1 Information Security and Data Protection

Suppliers must maintain security controls commensurate with the risks involved and with applicable legislation, especially for:t

- Maintain a formal security program, with policies, system updates and timely remediation of vulnerabilities;
- Adopt access controls based on the principle of least privilege, strong authentication, periodic reviews and data protection, including encryption where applicable and in compliance with the LGPD;
- Incorporate, when developing software for AXIA Energia, security practices throughout the entire application life cycle.

6 – INFORMATION SECURITY

6.2 Operational Resilience and Continuity

For critical or strategic services, the supplier must adopt measures commensurate with the criticality of the service provided, including:

- Promptly report security incidents or disruptions that impact AXIA Energia, adopt an appropriate response and align any public communications about the event in advance;
- Maintain and periodically test a continuity plan commensurate with the services provided, with agreed RTO and RPO for critical services, where applicable.

6.3 People Management and Supply Chain

Suppliers must ensure that their employees, representatives and relevant third parties act in a manner consistent with AXIA Energia's security and confidentiality requirements, in particular to:

- Promote training and awareness on security and privacy, ensuring confidentiality obligations for the professionals involved;
- Equivalent requirements, informing AXIA Energia about critical third parties and submitting relevant changes for prior assessment, where applicable.

6.4 Contract Life Cycle and Transition

Upon contract termination, the supplier must take steps to protect AXIA Energia's information and support the service transition without compromising operational continuity, including:t

- Return or destroy, in a secure and verifiable manner, AXIA Energia's information, as applicable;
- Cooperate with the transition to a new provider or in-house service, preserving information security and operational continuity.

7 – PROCUREMENT AND SUPPLIER RELATIONSHIPS

AXIA Energia conducts its procurement processes based on structured, transparent and impartial procedures, observing technical, financial, compliance, integrity, ESG and scope-adherence criteria. Participation in procurement processes and the maintenance of a commercial relationship with the company require compliance with the guidelines set out in this Guide, the provision of accurate, complete and up-to-date information, and adherence to the legal, regulatory, technical, contractual, quality, traceability and safety requirements applicable to the contracted scope.

7.1 Registration and information updates

The supplier must keep its registration up to date with AXIA Energia throughout the entire commercial relationship. To this end, it must provide complete and accurate registration information, as well as corporate, tax, regulatory, labor, social security, technical and other documents and evidence applicable to the nature of the supply or contracted service.

Omission, inaccuracy or failure to update information may result in registration restrictions, suspension of procurement processes, requests for regularization, application of contractual measures or other appropriate actions, depending on the severity of the case.

7.2 Supplier qualificationt

The purpose of supplier qualification is to verify the supplier's capacity to meet AXIA Energia's requirements, considering the nature, complexity and risks of the supply or service.

This process considers criteria defined by the company according to the supplier category, the criticality of the contracted scope, ESG materiality and risk exposure, covering, among other aspects, registration and documentary compliance, technical and operational capacity, financial standing, performance history, integrity and compliance practices, occupational health and safety requirements, environmental, social and governance aspects, as well as information security and data protection, where applicable.

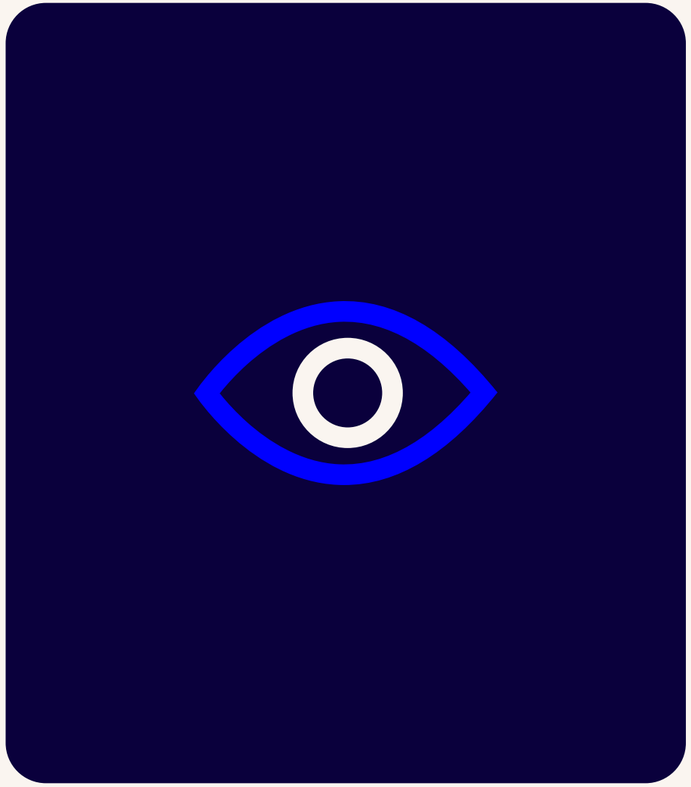
7 – PROCUREMENT AND SUPPLIER RELATIONSHIPS

7.3 Management, monitoring and due diligence

AXIA Energia manages, **monitors** and conducts **due diligence** on its suppliers on an ongoing and risk-proportionate basis, with the aim of identifying, preventing, mitigating and tracking factors that may impact its supply chain, operational continuity, legal compliance, integrity, security, ESG commitments and other requirements applicable to the commercial relationship.

This process considers, depending on the nature of the supply and the risks involved, technical, financial, regulatory, integrity, health and safety, environmental, information security, data protection, employee and equipment mobilization aspects, as well as other factors relevant to contract execution, with greater attention given to critical and strategic suppliers. This process includes the collection and analysis of evidence, compliance verification, periodic reassessment and the management of risks and non-conformities, with a view to the continuous improvement of supplier chain management.

Suppliers must maintain up-to-date, organized and traceable records and evidence, commensurate with the risks involved and applicable requirements, for the purposes of verification, monitoring and reassessment by AXIA Energia.



7 – PROCUREMENT AND SUPPLIER RELATIONSHIPS

7.3 Management, monitoring and due diligence

As part of management, monitoring and due diligence, AXIA Energia adopts measures such as:

- Requiring transparency regarding subcontracting involved in service delivery, including the identification of relevant third parties, the provision of supplementary information and, where appropriate, prior approval for their use, especially when there is a potential impact on information security, compliance, operational continuity or applicable contractual requirements;
- Requesting technical notes, reports, declarations, records, documentary evidence and other information necessary for compliance verification, monitoring of implemented controls and risk analysis related to the supplier;
- Requesting the completion of forms, questionnaires and self-declarations;
- Conducting background checks and queries from available reliable sources;
- Verifying the authenticity of documents and information provided;
- Conducting interviews with the supplier, by prior appointment;
- Conducting technical visits, inspections or audits at the locations where contracted services are performed or at the supplier's premises, by prior appointment;
- Adopting enhanced monitoring and in-depth due diligence measures for critical, strategic or higher-risk suppliers, including additional checks, interviews, technical visits, specific audits, requests for certifications, reports, declarations or independent verifications.

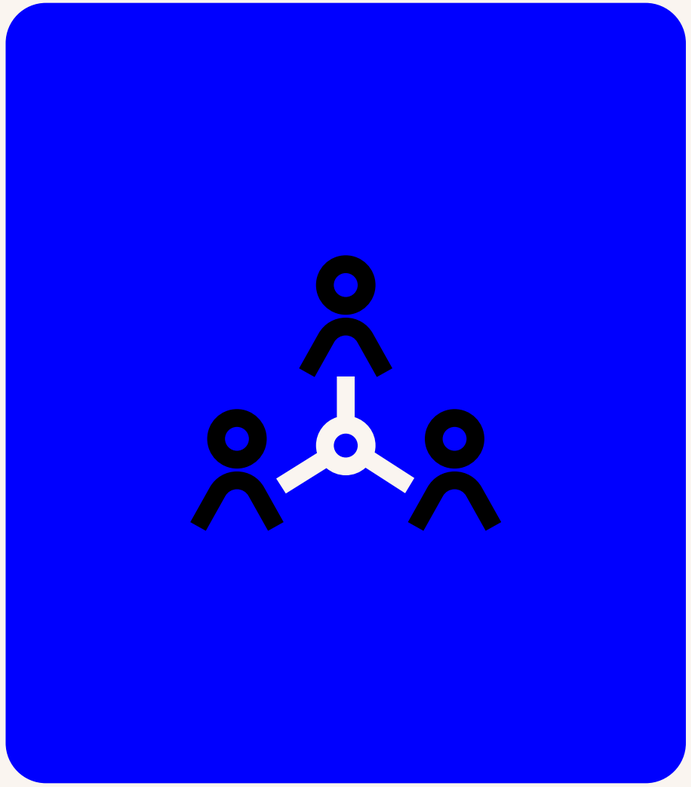
7 – PROCUREMENT AND SUPPLIER RELATIONSHIPS

7.3 Management, monitoring and due diligence

The supplier must cooperate with such requests and make available, within a reasonable timeframe, the documents, information, and evidence required for monitoring, audit, due diligence, and reassessment purposes, without prejudice to confidentiality obligations and applicable legal and contractual limits.

The supplier must submit to the assessment, monitoring, and due diligence processes adopted by AXIA Energia, including within the scope of its Compliance Program, providing any additional information and evidence that may be requested and promptly notifying any relevant changes in its registration, corporate, reputational, operational, or compliance status.

When non-conformities or significant risks are identified, AXIA Energia may, as appropriate, take the applicable measures set forth in the relevant contractual and regulatory instruments, including requests for clarification, definition of a corrective, preventive, or remediation action plan, enhanced monitoring, registration restrictions, suspension of new contracts, suspension of registration, contract termination, and notification to the competent authorities, where applicable.



7 – PROCUREMENT AND SUPPLIER RELATIONSHIPS

7.4 Classification of critical and strategic suppliers

AXIA Energia classifies suppliers as critical or strategic based on criteria related to the impact of their activities, the relevance of the supply, operational dependency, risk exposure, and ESG materiality.

In general, a critical supplier is one whose activities may have a significant impact on operational continuity, integrity, health and safety, information security, legal compliance, or other material risks to the company. A strategic supplier is one that provides goods or services essential to AXIA Energia's core business or that is highly relevant to the quality, availability, or sustainability of its operations.

This classification guides the level of oversight applicable to the supplier and takes into account objective criteria defined by AXIA Energia, including, among other factors, operational impact, regulatory exposure, ESG materiality, supply dependency, access to sensitive information, compliance history, and other elements relevant to the nature of the contracted scope and the risks involved.

7.5 Supplier performance evaluation

The supplier performance evaluation aims to monitor contract execution, verify the supplier's adherence to AXIA Energia's applicable requirements, and promote continuous improvement in performance and the commercial relationship.

Suppliers may be evaluated according to the nature of the supply or service provided, based on criteria previously defined by AXIA Energia, covering aspects of quality, compliance, health and safety, commercial performance, and other relevant elements, considering the criticality of the supply and the risks involved.

8 – COMMUNICATION CHANNELS

AXIA Energia provides appropriate communication and reporting channels to serve suppliers and other interested parties, according to the nature of the inquiry, request, or report, ensuring proper handling, confidentiality, and routing consistent with the subject matter reported.

8.1 Supplier relations

Direct contact channel for handling matters related to the commercial, contractual, and operational relationship with suppliers: **relacionamento.fornecedores@axia.com.br**

8.2 Ombudsman

Centralized channel for receiving requests, complaints, suggestions, and compliments related to AXIA Energia's relationship with suppliers, employees, third parties, and other interested parties: **https://www.axia.com.br/canaldeouvidoria**

8.3 Whistleblowing channel

Channel for receiving reports related to unethical, unlawful, or non-compliant conduct with legislation, this Guide, or AXIA Energia's guidelines. Reports may be submitted anonymously or identified, in accordance with the channel's rules, available 24 (twenty-four) hours a day, 7 (seven) days a week: **https://axia.com.br/canaldedenuncias.**

The supplier must be aware of AXIA Energia's Whistleblowing Channel and communicate its existence and purpose to its managers, employees, representatives, subcontractors, and other third parties involved in the execution of the contracted scope, guiding them to use it in good faith to report situations that may constitute a violation of legislation, the Code of Conduct, this Guide, AXIA Energia's guidelines, or potential conflicts of interest, with measures in place to prevent retaliation.

9 – FINAL CONSIDERATIONS

1. **AXIA Energia's suppliers must comply with this Guide, as well as the clauses, policies, procedures, and other contractual instruments applicable to their relationship with the company.** Where appropriate, they must also take measures to ensure that their employees, representatives, subcontractors, and other members of their supply chain observe principles and obligations consistent with those set out herein, in proportion to the risks involved.

2. **AXIA Energia may require evidence of the measures taken to disseminate, implement, and monitor this Guide**, as well as proof that subcontractors and other relevant third parties are subject to equivalent principles and obligations. This Guide complements, but does not replace the applicable legislation, contracts entered with AXIA Energia, and the company's other regulatory documents. Non-compliance may result in measures proportionate to the severity of the case, including requests for clarification, definition of a corrective action plan, enhanced monitoring, registration restrictions, suspension of new contracts, suspension of registration, contract termination, and notification to the competent authorities, where applicable.

3. **The governance of this Guide encompasses its dissemination, monitoring, periodic review, and continuous improvement**, based on evidence, identified risks, and lessons learned in supplier chain management, with the competent internal departments of AXIA Energia responsible for its interpretation, revision, and updating, in accordance with applicable corporate governance. Its revision may consider, among other factors, regulatory changes, emerging risks, monitoring results, performance evaluations, due diligence conducted, identified incidents, and lessons learned in supplier chain management.