PO-GN.06-001 Institutional and Government Relations	*Edition* 1.1	*Effective Date Start* 11/22/2024

PREPARED BY:

Vice-Presidency of Regulation, Institutional and Market
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REVIEWED/SUPPORTED:
Management of Processes and
Regulatory Affairs
Certifications Management
Compliance Directorate
Information Security Directorate
Sustainability Directorate
Corporate Governance Directorate

APPROVAL:

Executive Board (EB) – RES-561/2024, dated 11/11/2024.
Board of Directors (BD) - DEL-197/2024, dated 11/22/2024.

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1 INTRODUCTION

1.1 OBJECTIVE

To establish principles, guidelines, and responsibilities for institutional and government relations of AXIA Energia in its interactions with government or public officials from the Executive and Legislative branches, as well as, where applicable, the Judicial branch and functions essential to Justice, encompassing national and foreign public administration, with the objective of defending business interests and supporting the development of the regulatory framework aimed at sustainable growth of the national electricity sector.

1.2 SCOPE

This policy applies to all governance agents, leaders, and professionals of AXIA Energia who engage in institutional and government relations activities, as well as to third parties acting on behalf of the company in these processes.

2 REFERENCES

2.1 Law No. 12,527/2011 – Establishes the procedures to be observed by the Federal Government, States, Federal District and Municipalities, in order to guarantee access to information as provided in item XXXIII of article 5, item II of § 3 of article 37, and § 2 of article 216 of the Federal Constitution.

2.2 Law No. 12,846/2013 – Establishes the objective administrative and civil liability of legal entities for acts against public administration, national or foreign.

2.3 Law No. 12,813/2013 – Establishes conflict of interest rules in the exercise of federal Executive branch office or employment and subsequent impediments to the exercise of such office or employment.

2.4 Code of Conduct.

2.5 Compliance Policy.

2.6 Social Responsibility Policy.

2.7 Policy on the Disclosure of Material Information and Trading of Securities.

3 DEFINITIONS

3.1 ACRONYMS

3.1.1 **BD** – Board of Directors.
3.1.2 **EB** – Executive Board.
3.1.3 **ESG** – Environmental, Social and Governance
3.1.4 **IGR** – Institutional and Government Relations.
3.1.5 **PEP** – Politically Exposed Person

3.2 CONCEPTS AND DEFINITIONS

3.2.1 Management – Board of Directors, responsible for defining the corporate strategy of AXIA Energia, and Executive Board, Presidency and Vice-presidencies, responsible for conducting the business of AXIA Energia.

3.2.2 Foreign Public Administration – Set of state bodies and entities or diplomatic representations of a foreign country, at any level or sphere of government, as well as legal entities controlled, directly or indirectly, by the public authority of a foreign country. International public organizations are equivalent to foreign public administration.

3.2.3 National Public Administration – Entities of direct or indirect public administration, which involves the Union, States, Municipalities and Federal District, as well as their bodies, ministries, secretariats, departments, sub-secretariats, autarchies, companies, institutions, agencies and bodies owned or controlled by public administration and other public entities.

3.2.4 Government Official - Person belonging to any of the following groups:

a) employee, manager or representative who acts in an official or in the name of:
   i. a national government, a political division or a district of such government;
   ii. body, council, commission, court or agency, civil or military, of any of the entities mentioned above, regardless of its composition;
   iii. association, organization or company owned or controlled by the government; or
   iv. political party (collectively, "Governmental Authority ");
b) employee who works in legislative, administrative or judicial bodies, whether elected or appointed;
c) manager or individual who holds a position in a political party;
d) candidate for political office;
e) manager or employee of a supranational organization (for example, World Bank, United Nations, International Monetary Fund, Organization for Economic Cooperation and Development – OECD, CAF – Development Bank of Latin America); or
f) any other person connected or associated, including by direct kinship, with any of the above categories.

3.2.5 Public Official - Person who exercises, even if temporarily or without remuneration, by election, appointment, designation, hiring or any other form of investiture or bond, a mandate, position, or employment in entities of the Executive, Legislative and Judicial branches, as well as direct and indirect administration, within the scope of the Union, States, Municipalities and Federal District.

3.2.6 Governance Agents – Members of the Board of Directors, statutory executive board of AXIA Energia, as well as members of statutory advisory committees to the Board of Directors and members of audit committees.

3.2.7 AXIA Energia – Centrais Elétricas Brasileiras S/A and companies in which it holds direct or indirect corporate control.

3.2.8 Board of Directors - Collegial body of AXIA Energia responsible for setting the general direction of the company's business, defining its strategic direction, ensuring the proper functioning of governance systems, risk management and internal controls, and ensuring orderly succession of management.

3.2.9 Statutory Directors – President and Vice-Presidents, elected and removable by the Board of Directors, and directors of subsidiaries, elected in accordance with the rule provided in their respective bylaws, being responsible for acting in accordance with the mission, objectives, strategies and guidelines set by the Board of Directors of AXIA Energia, guiding their decisions according to the risk appetite statement disclosed by the Company.

3.2.10 Non-Statutory Directors - Professionals who hold leadership positions in the organizational structure of AXIA Energia, but who do not have formal designation in the company's bylaws. Although they do not have legal responsibilities as administrators, they exercise relevant leadership and management functions, contributing directly to the implementation of guidelines established by statutory bodies.

3.2.11 Executive Board – Collegial body composed of the President and Vice-presidents, which has specific competencies and authorities granted by the Bylaws and by the Board of Directors.

3.2.12 Leadership - Non-statutory directors, managers, executive managers and other managers included in the organizational structure of AXIA Energia.

3.2.13 Politically Exposed Person – Persons who, in the last five years, hold or have held, in Brazil or abroad, any position, employment, relevant public functions or leaders of political parties or who have family members, representatives or close persons in these conditions. Public positions and functions are understood to be those provided for in the rules for Prevention of Money Laundering and Financing of Terrorism issued by regulatory and supervisory bodies, including, but not limited to, Coaf Resolution No. 40/21 or current regulation that replaces it.

3.2.14 Professional – For purposes of this standard, equivalent to the term worker, described in ISO 45001 standard – person who performs work or work-related activities that are under the control of AXIA Energia.

> **Note 1:** Persons who perform work or work-related activities, according to various procedures, paid or unpaid, such as regular or temporary, intermittent or seasonal, casual or part-time.
> **Note 2:** Professionals include Management, people at managerial and non -managerial levels.
> **Note 3:** Work or work-related activities performed under the control of the organization may be performed by professionals employed by the organization, professionals from external suppliers, contractors, individuals, professionals from agencies and other persons, to the extent that the organization shares control of their work or work-related activities, according to the context of the organization.

3.2.15 Institutional and Government Relations – Relations established by the company with different sectors of society, with a focus on public authorities and third-sector institutions.

3.2.16 Stakeholders – Individuals or groups who can affect and be affected by the company's activities, directly or indirectly. They include, among others, shareholders, customers, suppliers, employees, community, government entities, media and Non-Governmental Organizations.

3.2.17 Third parties – Anyone who is not a governance, leadership or professional agent of AXIA Energia, and may be a legal entity, as well as its partners with greater participation, or a natural person, such as the following: suppliers, service providers, representatives, clients, partners, counterparties in corporate transaction processes, sponsored parties, recipient institutions, partner institutions, research and development institutions, among others.

4 PRINCIPLES

4.1 Strategic alignment

4.1.1 Acting in line with the values and purpose of AXIA Energia, collaborating with initiatives aimed at business sustainability, through balance and correlation between its business activities and its ESG practices.

4.2 Ethics and integrity

4.2.1 Acting based on ethics and integrity, in compliance with corporate regulations, the Code of Conduct and applicable legislation, always acting in good faith and with integrity in all institutional and government relations.

4.3 Transparency

4.3.1 Maintaining open and transparent dialogue with its stakeholders, including public officials, respecting the diversity of ideas, cultures and origins, through its own communication channel, without prejudice to rules aimed at relations with investors.

4.4 Excellence

4.4.1 Development of activities aimed at institutional and government relations with permanent dedication and focus on quality, through the implementation of effective methods and processes, seeking continuous improvement and optimization of results.

4.5 Disclosure of information

4.5.1 Disclosure of accurate and up-to-date information about the company's activities and their impacts on society, observing the provisions of the Policy on the Disclosure of Material Information and Trading of Securities.

5 GUIDELINES

5.1 AXIA Energia, aiming to achieve the objectives established in this policy, must:

5.1.1 Act in an integrated manner with the various areas of the company, in line with commitments and best practices in safety, environmental, social and governance matters, promoting the socio-environmental sustainability agenda and avoiding any situations that may constitute conflicts of interest.

5.1.2 Defend its interests in an ethical, transparent, and responsible manner, always respecting the rights and interests of stakeholders.

5.1.3 Maintain a constructive and initiative-taking relationship in interactions with public officials, based on dialogue, mutual respect, and collaboration.

5.1.4 Actively and coordinately participate in forums, debates, events, and associative entities relevant to the company's sector of operation, based on a centralized strategy defined by management.

5.1.5 Participate in legislative development processes and contribute to the formulation of public policies that impact the company's business, based on technical and well-founded arguments.

5.1.6 Promote partnerships with public authority to conduct actions that contribute to the sustainable development of communities covered by AXIA Energia's areas of operation, in line with its values, purpose, and responsibilities, and also considering strategic alignment with its business.

5.1.7 Share public information about the company's activities with stakeholders in a clear, accessible, and objective manner, in line with applicable regulatory and internal rules.

5.1.8 Seek to understand the views of institutional stakeholders about AXIA Energia through surveys, interviews, and other communication channels.

5.1.9 Conduct interactions with public officials, preferably in professional settings, during business hours, and always with the participation of more than one AXIA Energia representative, in compliance with the company's compliance guidelines.

5.1.10 Respond, in accordance with the law, to requests for information and documents from the public authority in a timely and complete manner, observing, among others, document classification, rules on protection of trade secrets, and provisions related to disclosure of information material to the market.

5.1.11 Establish transparent and constructive dialogue with stakeholders, seeking to understand their needs and expectations and relevant points that can be translated into requirements aligned with organizational objectives, ensuring that interactions follow the principles of responsibility, ethics, and sustainability.

6 RESPONSIBILITIES

6.1 Board of Directors (BD)

6.1.1 Approve this policy.

6.2 Executive Board (EB)

6.2.1 Approve this policy and forward it for approval by the Board of Directors.

6.2.2 Ensure implementation of this policy, overseeing compliance with the established guidelines in all its decisions.

6.3 Vice-Presidency of Regulation, Institutional and Market Affairs (VRR)

6.3.1 Ensure the application of the guidelines established in this policy.

6.4 Directorate of Institutional Relations (DIR)

6.4.1 Monitor and review this policy, as well as implement and disseminate its content.

6.4.2. Keep the map of relationships with public officials updated, as well as the strategy for these interactions, using the company's digital platforms and their respective records, as provided for in corporate regulations.

6.5 Governance Agents, Leadership, Professionals and Third Parties

6.5.1 Adopt the guidelines described in this policy.

7 GENERAL PROVISIONS

7.1 For compliance with this policy, AXIA Energia shall be represented by professionals, except interns and apprentices, and its leadership, acting in a decentralized manner within its corporate structure and under the coordination of the institutional and government relations department.

7.2 The applicable legal and regulatory provisions related to the subject and the company's specific legal determinations and agreements in force must be observed.

7.3 This policy may be further detailed by the managing department in other specific regulatory documents, always aligned with the guidelines established here.

7.4 Any regulatory documents and provisions contrary to this policy are hereby repealed.

8 EDITION HISTORY

Edition	Name	Doc. and approval date
1.0	Institutional and Government Relations	RES-561/2024 of 11/11/2024 and DEL-197/2024 of 11/22/2024
1.1	**Key Changes**	
New standardization and adjustment of the regulatory document.		