

ANTI-CORRUPTION POLICY

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1. *Introduction*

The Brazilian Anti-Corruption Law came into force in 2014 and represents a landmark in the fight against corruption in Brazil, providing for the liability of legal entities in the administrative and legal spheres for **corruption acts** on an objective basis, that is, regardless of their awareness of the act or intention to harm the State. Therefore, the company can be penalized not only for harmful acts committed by its managers, but also for acts committed by its employees, suppliers, service providers, as well as intermediary and associated agents acting on the company's behalf and/or representing its interests.

In this context, Equatorial Energia Group now ensures the prevention and fight against corruption by complying with Federal Law 12,846/13 - the Brazilian Anti-Corruption Law. All Group companies must comply with this law. For this reason, this Policy sets forth rules and standards of conduct that are applicable to all Employees and Partners when performing their roles or providing services for Equatorial Energia Group. The purpose of this policy is to ensure strict compliance with the applicable legislation, while maintaining the highest ethical standards.

2. *Definitions*

To standardize the terms and expressions used herein, words starting with capital letters will be interpreted as follows:

“Equatorial Energia Group”: Equatorial Energia S.A., including all Group companies.

“Employees”: All people working at Equatorial Energia Group, including managers, officers, board members, and employees of any nature regardless of their contractual or corporate relationship with Equatorial and/or Equatorial Energia Group.

- “Partners”: All commercial partners, consultants, agents, suppliers, representatives and everyone receiving compensation or not that provide services – albeit temporarily – for Equatorial Energia Group.
- “Public Agent(s)”:. any (i) agent, authority, employee, civil servant, or representative of any governmental entity, body, department, agency or public office, including any entities of the Executive, Legislative and Judiciary branches, direct or indirect public administration entities, state-owned companies, government-controlled private companies, and national or international government foundations; (ii) any person performing, even if temporarily and without remuneration, any position, function or job in any entity of a State and its instrumentalities, including entities that provide services or serve a public function; (iii) an officer, director, employee or representative of a public international organization (iv) an officer, director or employee of any political party, as well as candidates running for elective public or political office, in Brazil or abroad; (v) a member of a royal family, including persons who have no formal authority but may influence business interests; and (vi) the spouse or other Close Relative of a Public Agent.
- “Politically Exposed Persons”: Public agents holding or having held – over the last five years in Brazil, other countries or foreign territories and premises – relevant positions, public office or functions, including their representatives, family members or other persons with whom they have a close relationship.
- “Things of Value”: Any kind of financial or non-financial offers, such as money, gifts, entertainment, hospitality, favors, services, loans, guarantees, use of property or equipment, job or internship offers, donations or favorable opportunities, political or charitable contributions, changes of commercial conditions, discounts, and refund or payment of expenses or debts, among others, directly or indirectly provided for individuals (or their close relatives) who may benefit from business conducted with Equatorial Energia Group.

- “Entertainment”: Tickets for concerts, theaters, and exhibitions, as well as sports, social or other kind of events that are open to the general audience.
- “Undue Advantage”: Any direct or indirect, tangible or intangible, particular advantage, payment or benefit to which an individual is not entitled.
- “Hospitality”: Food, reception, accommodation, and travel, ticket or transportation expenses of any nature, among others, that may be necessary to enable, for example, the presentation of products, use of premises, and invitations to events or corporate parties held by Equatorial Energia Group.
- “Close Relative(s)”: Children, stepchildren, parents, stepparents, spouses, siblings, parents-in-law, children-in-law, siblings-in-law, and any other person living in the same household, save for tenants and employees.
- “Gift(s)”: Any bonus, favor, benefit, discount or tangible or intangible items. They also include courtesies, meals, beverages, services, training sessions, transportation, discounts, promotional items, accommodation or gift cards.
- “Bribery”: Offering, giving, soliciting, authorizing or receiving money, gifts, things of value, and other undue advantages, or any kind of offer made to induce any illegal acts, omission, undue influence or advantage, dishonest or unlawful practices, or a breach of trust as to the performance of functions of an individual.
- “Extorsion”: Serious and imminent threat to the physical integrity of an individual or asset to obtain money or other things of value.
- “Fraud”: Intentional deceit or dishonest, false or illegal methods to obtain undue or unlawful advantage.

3. Purpose

Equatorial Energia Group is committed to conducting its business in accordance with high ethical, integrity and transparency standards and ensuring adequate procedures for preventing the payment of bribery, in full compliance with the applicable anti-corruption laws,

notably Law 12,846/2013 (“Brazilian Anti-Corruption Law”) and the U.S. Foreign Corrupt Practices Act (“FCPA”)¹ (jointly “Anti-Corruption Legislation”).

This document aims to compile the rules and guidelines on fighting corruption (“Anti-Corruption Policy”), based on the Code of Ethics and Conduct of Equatorial Energia Group.

4. Scope

This Anti-Corruption Policy applies to all Employees of Equatorial Energia Group. Partners are expected to follow the same ethical, integrity and transparency standards set out in this Anti-Corruption Policy.

The companies of Equatorial Energia Group must follow this Anti-Corruption Policy whenever it is applicable.

All Employees and Partners must comply with the rules set forth in this Policy, as applicable, and other internal policies of Equatorial Energia Group.

5. Measures to Fight Corruption

5.1 Anti-Corruption

Although corruption can be present in any negotiations, including those conducted with private companies and individuals, it is especially more frequent and serious when interacting with Public Agents. The Employees of Equatorial Energia Group must always take a stand against corruption, even if it constitutes a proposal made by Public Agents or customers. In such cases, the proposal shall be immediately communicated to the Compliance Department for guidance on how to address the situation. Alternatively, it can be reported through the Reporting Channel for the pertinent investigation to be conducted.

No matter with whom they are negotiating, the Employees of Equatorial Energia Group must make decisions based on legitimate business factors, such as price, quality and service, among other factors that are essential to ensure free competition. At the same time, the Employees shall maintain the ethical, honest and transparent practices of Equatorial Energia Group during negotiations with the market, so as to carry out suitable contracts and transactions.

5.2 Facilitation Payments

¹ Note: Black Rock, a U.S. fund, is the shareholder of Equatorial Energia. The Company also has some fragmented shares (69%) with ADRs in the market. For this reason, the FCPA applies to Equatorial Energia.

Employees and Partners working on behalf of Equatorial Energia Group must not facilitate payments. Facilitation payments consist of small payments made to Public Agents or third parties related to them in an attempt to expedite processes or ensure advantage through routine and nondiscretionary governmental actions, such as permissions, licenses, customs documents and other official documents, or police protection and other similar actions.

5.3 Presents, Gifts, Entertainment and Hospitality

Equatorial Energia Group is committed to conducting its business with customers and Partners in an environment where decisions are made with independence and integrity, taking into consideration only legitimate business factors. Therefore, the offer or receipt of presents, gifts, hospitality or entertainment shall not be considered relevant when making corporate decisions.

It is permitted to offer gifts displaying the name or logo of Equatorial Energia Group with the purpose of disclosing the Company's name and brand. Gifts are intended for Partners, customers and other persons who have a professional relationship with Employees. Gifts shall not serve the purposes of returning favors or fostering personal relationships. The offer of gifts to Public Agents shall be previously approved by the Compliance Department.

Employees must always pursue the best interests of Equatorial Energia Group and its customers, avoiding any activity that may create an actual conflict of interest or be perceived as inappropriate for business relations. Hospitality will be legitimate and allowed if related to the business of Equatorial Energia Group, in the presence of at least one Group Employee. The offer of hospitality to Public Agents shall be previously approved by the Compliance Department.

Employees must consult the Compliance Department if they have questions about Gifts, Presents, Entertainment or Hospitality that can be received or offered within the scope of specific business relations not covered herein or in the Company's Code of Ethics and Conduct.

Presents and entertainment received and/or offered by Employees, individually or in the aggregate, in compliance with the provisions set out above, shall not exceed R\$100.00 per fiscal year, if they are given to or received by the same person, company or entity.

5.4 Political Contributions

Employees shall not promise, offer, authorize or make, directly or indirectly, any donation or political contribution to political parties or candidates running for public office using the funds of Equatorial Energia Group or on its behalf.

Political contributions consist of monetary contributions, transport of candidates and their teams, offer of political campaign meeting spaces, and payment of political campaign printing materials or any other service that may benefit political parties and/or candidates.

This Anti-Corruption Policy is not intended to prevent the Employees of Equatorial Energia Group from engaging in political campaigns or making their personal political contributions. However, if the Employees intend to do so, they must not: (i) declare that their personal political contributions (or any related opinions or affiliations) are in any way related to Equatorial Group; and (ii) make or allow the disclosure of any contributions associating them, in any way, with Equatorial Energia Group.

5.5 Sponsorships or Charitable Donations

All charitable donations to support philanthropic organizations and sponsorships to promote the development of culture, sports and others of the same nature are permitted, provided that they strictly observe the specific procedures of Equatorial Energia Group regarding the topic and any applicable laws and regulations in force. Additionally, said sponsorships and charitable donations shall not be used to inappropriately influence commercial decisions.

Equatorial Energia Group must make sure that charitable donations and sponsorships are not used to promote unlawful payments, conducting an adequate due diligence process to avoid, for example, that the benefited charities serve as a means to fund unlawful activities, thus violating this Anti-Corruption Policy or any other applicable anti-corruption laws and regulations.

Sponsorships consist of any contribution in cash, products or services provided by Equatorial for an initiative organized by a Partner to advertise or disclose the brand of Equatorial Energia Group.

The following types of sponsorships are permitted:

- Sponsorships to hold events or to prepare products that encourage and promote actions and the sharing of knowledge of culture, society, environment and sports. In such cases, sponsorships must be approved by the Compliance Department of Equatorial Energia Group.
- Contributions consisting of financial transfers, or the offer of products or services of Equatorial Energia Group to legal entities in order to carry out projects or hold events with commercial, technical and/or promotional purposes, which, in return, promote the brand, products, services, projects or actions of Equatorial Energia Group.

Employees in charge of sponsorships shall make sure that they are held with transparency through a written agreement, based on legitimate business purposes and in accordance with the compensation agreed upon with the organizer of the event. Fair market value assessments of all sponsorship publicity shall be carried out and documented by the Employee in charge.

Employees in charge of sponsorships shall also make sure that:

- Reasonable research is conducted to indicate that the entity to hold the event is not directly or indirectly associated with a Public Agent;

- Sponsorships are not be held to obtain or retain any undue advantage or to inappropriately favor one's business; and
- Funds are transferred directly to the bank account of the entity holding the event.

To avoid noncompliance with the Anti-Corruption Legislation, Employees may only make charitable donations when:

- They are permitted by the local laws;
- Reasonable research is conducted to indicate that the proposed beneficiary is not directly or indirectly associated with a Public Agent;
- The charities receiving the donations are accredited and with an unblemished reputation;
- They are not held to obtain or retain any undue advantage, or to inappropriately favor one's business.
- The benefited institution will not rely on said donations to continue operating;
- The objectives of the benefited institution are clearly described and in line with the values of Equatorial Energia Group;
- The benefited institution formally declares how the donated funds will be used;
- They are previously and formally approved;
- The benefited institution pledges – by means of a contract – to report on the use of funds; and
- The funds are transferred directly to the bank account of the benefited institution.

Before offering or making any donations or holding sponsorships, the Employee shall obtain the approval of the Compliance Department and get in touch with it if he/she has questions about the topic.

5.6 Solicitation and Extorsion

If Employees believe that (i) they are in immediate danger; (ii) their lives are at risk; (iii) they felt compelled to make a payment; or (iv) they felt compelled to commit any act that somehow violates this Anti-Corruption Policy, they must choose to preserve their safety – even if they cannot report the occurrence to the Compliance Department in advance.

If payments are made under said circumstances, the Employees must: (i) immediately communicate the occurrence and the payment details to the Compliance Department; (ii) make sure that the reported information will be precisely recorded in the books and records of Equatorial Energia Group and/or the books of any Group companies; and (iii) file a police report when they believe the occurrence constitutes a crime.

To avoid the risk of exposing the companies of Equatorial Energia Group or themselves to questions or penalties for committing acts of this nature, all Employees and Partners must comply with the rules.

Situations not provided for herein or in the Code of Ethics may arise. In such cases, Employees and Partners are advised to contact the Compliance Department so that their questions can be answered.

MANDATORY TERMS OF CONDUCT FOR ALL EMPLOYEES AND PARTNERS

Gifts, bonuses, travel, hospitality and entertainment

- **Under no circumstances** offers, promises payments or authorizes payments for travel, lodging, or entertainment expenses to a public official or a related third party with no previous approval from Compliance Department.
- **Under no circumstances** offers, promises, pays or authorizes the payment of meals, gifts or bonuses to public agents or third parties related to them, in amounts or conditions not consistent with those provided for in the Equatorial Energia Group company's expense policy to which the Employee or Partner is linked.
- **Under no circumstances** offers, promises, authorizes the granting of benefits and advantages of any nature or performs payments to any public agent or to third parties related thereto, in order to simplify the procedure or facilitate administrative procedures or routine services, such as: license issuance, authorization and customs clearance.
- **Always** verify if there is any business (pending or future) or other interests of Equatorial Group under the influence of a public agent to whom you intend to offer gifts, bonuses, or any other valuable item.
- **Always** keep a written record of the payment of any valuable items to a public agent or a related third party.

Donations

- **Under no circumstances** donate on behalf of any company of Equatorial Group: (i) to individuals and for-profit organizations; (ii) to organizations, whose purpose is not consistent with Equatorial Energia Group's principles and rules in this Guidelines or other Equatorial Energia Group regulations; (iii) using bank deposits in private accounts; and/or (iv) that would jeopardize Equatorial Group's reputation.
- **Under no circumstances** perform donations or financing aiming to obtain an advantage, mainly if they are related to parties, politicians or public agents who may have some influence over the company's future or pending business.

Financing and political contributions

- **Under no circumstances** perform, on behalf of the companies of Equatorial Energia Group, contributions of values, goods or services to political campaigns or causes, without previous and express authorization of the Compliance Department.

Hiring of intermediaries, agents, or any third party

- **Under no circumstances** hire individuals or companies (i) who are under investigation for offenses against the government; (ii) who are related to or have been appointed by a public agent with some influence over the company's business; or (iii) who require unusual contractual conditions and payment methods conflicting with the provisions of domestic law.

6. *Anti-Corruption Measures*

To increasingly strengthen and foster the anti-corruption culture within Equatorial Energia Group, the Compliance Department will periodically monitor and revise the rules and mechanisms for preventing and fighting corruption implemented by the Group.

Also, Equatorial's Compliance Department will provide annual employee training sessions, instructing them to: (i) recognize situations that may expose Equatorial Energia Group to the risk of being exposed to questions or penalties for corruption; (ii) prevent and fight corruption within Equatorial Energia Group and when interacting with third parties, especially public agents.

Employees must participate in training sessions, and their direct Officers are responsible for their attendance. If substantive changes are made to the current version of the Manual, the Compliance Department will provide new employee training sessions.

If after attending training sessions Employees and Partners still have questions, they shall contact the Compliance Department, which will provide them with clarification and recommend the most appropriate behavior towards situations that may expose Equatorial Energia Group to questions or penalties for harmful acts committed against the public administration.

6.1 *Relationship with Partners*

Equatorial Energia Group selects Partners with impartiality and transparency, based on technical, professional and ethical criteria. The hiring of Partners based on personal interest is prohibited. For this reason, the hiring of Partners must be preceded by prior assessment.

The Employees must adopt all the necessary measures to observe the due prior evaluation and hiring of Partners, ensuring that the selected Partners follow the same ethical standards of Equatorial Energia Group. As a result, when conducting the prior assessment of Equatorial Partners, Employees must be alert to the following:

- **Reputation:** The Partner (i) expresses economic interests that appear to be contrary to or incompatible with that of Equatorial Energia Group; (ii) is engaged in unlawful activities; (iii) is associated with or known for operating shell companies; (iv) issues false statements or provides information that is false, incomplete or imprecise, or refuses to comply with reasonable assessment and due diligence requests; and (v) requires that his/her/its identity, final beneficiaries or representatives remain confidential, without reasonable justification.
- **Qualification:** the Partner: (i) is a Public Agent, a Politically Exposed Person or a Close Relative thereof; (ii) is recommended or required by a Public Agent or by somebody with any direct or indirect relationship of interest with a Public Agent or a Politically Exposed Person; and (iii) does not have the facilities or qualifications to render the service to be contracted.
- **Hiring:** the Partner: (i) refuses to sign a written contract; (ii) refuses to issue compliance declarations; (iii) refuses to agree to internal controls; (iv) requires

compensation substantially above the market's average; and (v) requests that the contract does not accurately describe the services to be provided.

- **Payment:** Partners (i) requesting for unusual payment, upfront payment, non-standard commissions, or that payments be made abroad or to a third party; (ii) requesting for vague or indefinite payment; (iii) requesting for payment without the appropriate documentation or payment for a service that cannot be confirmed; and (iv) submitting rounded amounts and/or excess expenses for reimbursement.

As a result of the large volume of Partners hired and the wide range of contracts entered into by Equatorial Energia Group, each Group company may adopt its own procedures for verifying new Partners, provided that a reasonable due diligence process is conducted before the hiring and that the activities performed are monitored, considering the relevance of contracts, the type of service provided, the legal nature of the Partner, and other information that may be relevant to analyze the risk arising from the service to be provided. Said rules must be set out in specific policies.

Every relationship between Equatorial Energia Group and Partners must be preceded by a formal contract in writing under the terms and conditions previously approved by the Legal and Compliance Departments. Additionally, these contracts shall contain an anti-corruption clause, whereby the parties pledge to fully comply with applicable anti-corruption rules and laws, including those within the jurisdictions in which they were registered and the jurisdiction under which the contract in question will be enforced (if the jurisdictions differ).

Any payment and transaction for the purposes of compensation, commission, fees or other type of disbursement in favor of Partners (even if the service has already been provided) may only be made by the financial department after the approval and execution of the respective contract, and said payments and transactions shall be precisely booked in the accounts of Equatorial Energia Group, indicating the recipient and nature of the payment.

Upon execution of contracts with Partners, they are required to sign the instrument of agreement and acknowledgement of the policies adopted by Equatorial Energia Group, declaring their wide knowledge of the content of said documents, undertaking to observe them and enforcing them on their employees and service providers.

6.2 Relationship with Public Agents

It is illegal to offer, promote, pay for, or authorize the payment of any thing of value to any Public Agent, so as to obtain undue advantage.

For the purposes of this Policy, Public Agents consist of persons holding position, employment or function at quasi-public entities; persons working for service providers or affiliates to perform activities that are typical of public administration; and family members, partners or friends of the above-mentioned qualified persons.

Equatorial Energia Group is committed to promoting ethical, loyal and transparent interaction among Employees, Public Agents and Politically Exposed Persons during all

inspections and other interactions as a result of the Company's business, in accordance with the applicable laws, regulations and best practices.

Hearings or meetings with Public Agents or Politically Exposed Persons to discuss public contracts, inspections and others must be preceded by formal request sent by email or filed with the corresponding body. The requests must contain at least the following:

- Suggested date, time and place;
- Identification of Employees who will attend the hearing or meeting;
- The topic to be addressed; and
- The document that is the object of the discussion, if applicable.

Hearings or meetings with Public Agents or Politically Exposed Persons shall be preferably held at public agencies, offices or buildings during business or on-call hours, as duly established in the body's functioning rules.

All Employees and Partners of Equatorial Energia Group shall immediately report any interaction considered below the Company's adopted ethical and conduct standards to the Compliance Department.

6.3 Obstacles to Investigations and Inspections

In accordance with the Brazilian Anti-Corruption Law, it is also illegal to hinder investigation or inspection that may be conducted by public bodies, entities or agents, including regulators (such as ANEEL), and inspection bodies of the national financial system (such as CVM).

Typical practices that may arouse suspicion of corruption include:

- *Bribery: the offer or payment of any thing of value to public agents assessing the need to investigate the company, or who are already investigating the company; and*
- *Obstacles to Investigation: action or omission hindering or preventing inspection authorities, such as ANEEL or CVM, from accessing existing information or documents (i) held by persons subject to the legislation; and (ii) that have been requested by said authorities.*

To avoid the risk of exposing the companies of Equatorial Energia Group or themselves to questions or penalties for practices of this nature, all Employees and Partners must comply with the rules indicated in the chart below:

MANDATORY TERMS OF CONDUCT FOR ALL EMPLOYEES AND PARTNERS

- **Under no circumstances** offers, promises, pays or authorizes the payment of any amount to public agents, aiming at influencing its decision regarding the opening or conduction of any investigation against companies of Equatorial Group or its Employees and Partners.
- **Under no circumstances** dispose any sensitive documents of any nature from Equatorial Group's companies, with no previous and express approval from the Legal Department of the Equatorial Group's company to which you are linked.
- **Always** consult the Legal Management of the Grupo Equatorial's company to which you are linked before answering any request for information or document about Grupo Equatorial's companies by public agencies, entities or agents.

6.4 Mergers and Acquisitions

Certain measures shall be taken when acquiring companies or businesses, so as to ensure their compliance with the ethical standards adopted by Equatorial Energia Group.

The Anti-Corruption Legislation sets forth that, as the acquirer, Equatorial Energia Group may be held liable for corruption acts committed by the companies and/or businesses it has acquired.

As a result, a due diligence process to fight corruption in the target companies, in accordance with the adequate risk classification approved by the Compliance Department of Equatorial Energia Group, is required to protect the organization against any liability for previous or future corruption practices.

The due diligence process will help establish the target company's actual acquisition value and determine whether a compliance process of the acquiring company could put the acquirer's profitability at risk. The scope shall be adequate for the target company's risk profile and may be adjusted to the circumstances of each business. Thus, the due diligence process to fight corruption may include:

- The identification of high-risk areas;
- Understanding of the business model of the target company or business;
- Interviews with management of the target company or business;
- Verification lists containing requests for information and documents;
- Public information research to verify the reputation of the company and its management; and
- Identification of warning signs and other measures recommended on a case-by-case basis.

6.5 Confidentiality of Information

All Employees must maintain confidentiality concerning all matters that have not been intended for public disclosure relating to Equatorial Energia Group. Only authorized Employees can speak on behalf of Equatorial Energia Group.

Employees, Partners or shareholders who have access to insider information are prohibited from buying or selling securities from issuers of Equatorial Energia Group, or from disclosing insider information to third parties to do so over the fifteen (15) days preceding the disclosure of quarterly or annual financial information, or even previously to the release of material act or fact, if said issuers are obliged to release it.

Insider information consists of information unknown by a set of investors who may consider it important to decide to buy, sell or continue to hold securities from any issuers of Equatorial Energia Group.

Any Employee may have insider information, no matter the responsibility level or position he/she holds.

The following are examples of insider information:

- Investment or divestment plans;
- Results projections;
- New projects, products or processes under development;
- Administrative, legal or arbitration contingencies and overdue bids that have not been disclosed yet.

Employees and shareholders are allowed to trade securities from any issuer of Equatorial Energia Group, provided that they observe the rules and regulations applicable to the topic, use good judgment, and do not make use of their securities to encourage short-term volatile changes or gains.

6.6 Accounting Books and Records

It is fundamentally important that the accounting and information of Equatorial Energia Group is reliable, authentic, and transparent, being maintained in a precise, comprehensive and accessible manner with regular disclosure.

Equatorial Energia Group maintains an internal accounting control system and requires that its Employees prepare and maintain records that reflect the operations and the sale of assets in a precise and detailed manner. False, misleading or incomplete entries in these records or other documents are strictly prohibited. Funds or accounts that have not been disclosed or booked cannot be established for any purpose.

Expenses incurred by Employees of Equatorial Energia Group shall be detailed, with their actual and valid receipts or invoices reflecting the amounts spent. The submission and conscious acceptance of false receipts and/or invoices are strictly prohibited, being subject to disciplinary sanctions, dismissal with cause and other applicable legal liabilities.

6.7 Document Preparation

Even if all the above-mentioned rules are followed, writing or speaking things carelessly may result in your message being misinterpreted. Moreover, depending on what has been said or written, it can be used as relevant evidence against the company or the person who said or wrote the message. For this reason, it is fundamentally important that all Employees and Partners avoid terms that might arouse the suspicion of the involvement of the companies of Equatorial Energia Group in corruption practices.

7. Duties and Responsibilities

Employees shall be responsible for acting in accordance with the guidelines defined in this Anti-Corruption Policy in their daily work routines, as well as other applicable policies, ensuring that said guidelines are contractually required, as applicable, and passed on to all

Partners in a clear manner. Additionally, they must cooperate with all investigations of alleged corruption practices, with confidentiality fully assured.

8. Disciplinary Sanctions

The Employees and Partners of Equatorial Energia Group must comply with this Anti-Corruption Policy. Any breach of these rules may result in disciplinary sanctions, including warning, suspension, disciplinary action, dismissal with or without cause or the immediate termination of employment contract, and the cancellation of the commercial partnership.

Said penalties will be imposed based on the act committed by the Employee or Partner. Besides the above-mentioned sanctions, the Employee or Partner may also be held legally liable for the act committed.

Any penalty shall be preceded by thorough investigation conducted with discretion, confidentiality and civility, explaining to the violator why he/she is being punished in a clear and detailed manner.

Given the specificities of each investigated occurrence, the Compliance Department shall be responsible for defining the best way to ensure the right to adequate defense and objection, seeking to preserve the anonymity of the involved parties, especially the whistleblower.

9. Penalties for Harmful Acts Committed against the Public Administration

Companies and other legal entities may be held administratively or legally liable for corruption practices, which, under the Brazilian Anti-Corruption Law, are called “harmful acts against the public administration”. As already mentioned, the liability of legal entities that benefit from acts of that nature does not depend on any evidence that they were aware of the act or intention to cause damage to a public body, state-owned company or foreign public entity.

It is also worth noting that the liability of legal entities does not exempt managers, employees, commercial partners and/or other individuals directly engaged in corruption practices from being held individually liable for said corruption practices. These persons may be punished in the administrative, civil and criminal spheres, being also subject to sentence of imprisonment.

Corruption practices or harmful acts against the public administration consist of:

- Frustrating or defrauding public tenders;
- Impeding, disturbing or defrauding the holding of any public tenders;
- Deflecting or trying to deflect competitors from public tenders;
- Defrauding public tenders or contracts resulting from them;

- Illegally or inappropriately forming legal entities to engage in public tenders or to enter into administrative contracts;
- Illegally obtaining advantage or benefit from amendments or extensions to contracts entered into with the public administration, without authorization by law, in the bid notices or in the respective contractual instruments; and
- Manipulating or defrauding the economic and financial balance of contracts entered into with the public administration.

The chart below shows some of the main penalties applied to individuals and legal entities for corruption practices:

PENALTIES FOR HARMFUL ACTS AGAINST THE PUBLIC ADMINISTRATION	
ADMINISTRATIVE SPHERE	Fines from 0.1% to 20% of the company's gross revenue; publication of the conviction decision in the mass media.
CIVIL SPHERE	Loss of assets and rights; suspension or partial suspension of activities; compulsory dissolution; ban on incentives, subsidies, grants, donations or loans from public bodies or entities for up to 5 years; full compensation for the damage caused to the public body or state-owned company.
CRIMINAL SPHERE	Legal Entities. None. Individuals* . Imprisonment and fines. <i>*Including managers, employees, commercial partners and representatives.</i>

Therefore, it is fundamentally important that all Employees and Partners are aware of what can be considered “corruption acts” or “harmful acts against the public administration”. As a result, they can maintain the standard of conduct to avoid any exposure of Equatorial Energia Group or themselves to questions for practices of this nature in any sphere.

All Employees and Partners must comply with the rules set out in the chart below to avoid penalties on the companies of Equatorial Energia Group or themselves for practices of this nature.

MANDATORY TERMS OF CONDUCT FOR ALL EMPLOYEES AND PARTNERS

- **Under no circumstances** share with representatives and employees of competitors any commercially strategic information about Grupo Equatorial's projects (pending and future), such as bids in which the companies of Equatorial Energia Group operate or intend to participate; costs and prices; research and development; or terms and conditions of sales to a specific customer.
- **Under no circumstances** discuss with representatives and employees of competitors about the terms and conditions for companies of Equatorial Energia Group to participate in bids.
- **Under no circumstances** contributes to the bidding authority when preparing the public notice for a future bidding process, especially when defining the conditions for participating and rating proposals, except using transparent methods such as public consultations and hearings.
- **Under no circumstances** consult the Compliance Department before signing a government agreement before a bidding process is held; and keep a written record of any reasons for waiving or not holding a bidding process.
- **Always** consult the Compliance Department and the Legal Management of the company you are linked to before negotiating new terms and conditions originally provided for in public contracts; and you should keep a written record of the reasons for any revisions to these terms and conditions.
- **Always** report to the Compliance Department any and all transactions with public agents you consider not to comply with standards of ethics and good practice.

10. *Reporting Channel*

Equatorial Energia Group has a Reporting Channel for Employees, Partners, customers and the external stakeholders to make reports with safety and responsibility, thus contributing to maintaining a safe, ethical, honest, transparent and productive corporate environment.

It is prohibited to obstruct or dissuade Employees from reporting what they believe to be a violation of the commitment defined herein, constituting reason for imposing disciplinary sanctions, which may lead to dismissal.

Retaliation against those that, in good faith, report illegal conduct or non-compliance with the guidelines established in this Anti-Corruption Policy shall not be allowed or tolerated.

All Employees and Partners engaged in investigations are ensured anonymity, and they must maintain the confidentiality of all measures of which they become aware.

Should a violation of this Manual or the Anti-Corruption Legislation be confirmed upon completion of the investigation, the violator shall be duly punished based on the severity of the violation. Said sanctions include warning, suspension, disciplinary action, and

dismissal with or without cause, according to the contractual relationship entered into between with Equatorial Energia Group and the Employee in question, or the immediate termination of employment contract, and the cancellation of the commercial partnership, in case of suspicious activities performed by a Partner, without prejudice to the applicable legal measures.

11. *Miscellaneous*

Equatorial Energia Group is committed to operating with honesty, transparency and integrity, in compliance with the Brazilian Anti-Corruption Law and other legal instruments.

All own employees, executives, board members, managers, suppliers and outsourced employees that are directly or indirectly related to Equatorial Energia Group must comply with and enforce the terms and conditions of this Policy. Non-compliance with this Policy may lead to administrative, civil and criminal liability for acts harmful to the public administration.

It is important to emphasize that this Policy is not exhaustive, and evidence may vary as a result of the nature of operations, requests for payments and/or expenses, as well as procedures and rules of each company of Equatorial Energia Group.

If you identify warning signs, have questions about the applicable legislation or the interpretation of this Policy, please use one of the access channels described in item 10, or contact the Compliance Department immediately.

Therefore, this Policy aims to instruct those directly or indirectly involved with Equatorial Energia Group to behave in a legal, ethical, transparent and professional manner.