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ANTI-CORRUPTION POLICY

PURPOSE AND SCOPE

To set rules of conduct that must be observed by all Employees and Third Parties of GD - GERAÇÃO DISTRIBUÍDA PARTICIPAÇÕES S.A., its direct and indirect affiliates and subsidiaries (the "Company"), during interaction with government officials and/or employees of public utility concessionaires ("Government Officials"), in order to avoid situations propitiating corrupt practices.

GENERAL GUIDELINES

All of the Company's business relations are based on integrity and compliance with Anti-Corruption Laws.

All of the Company's Employees and Third Parties are prohibited from:

Promising, offering, giving or authorizing any Undue Advantage, directly or indirectly, to a Government Official, or to any third party related to them, regardless of whether there is a consideration for such Undue Advantage;

Frustrating or defrauding the competitive nature of public tenders, acts of the public bidding procedure and/or government contracts;

Hindering or intervening in investigations or inspections by government authorities, in particular, environmental inspections.



**DURING INTERACTIONS WITH
GOVERNMENT OFFICIALS AND PRIVATE
PLAYERS:**

Transparency, caution and unrestricted compliance with the guidelines contained in this Policy and the Anti-Corruption Laws.



DEPENDING ON THE CIRCUMSTANCES, THE ITEMS BELOW, LISTED IN A NON-EXHAUSTIVE MANNER, MAY BE CONSIDERED AS AN UNDUE ADVANTAGE UNDER THE TERMS OF THIS POLICY:

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Gifts

Hospitalities

Job offers

Donations or sponsorships

In the event of a request for an Undue Advantage by a Government Official and/or a Private Player, the Company's Employees and Third Parties shall:

Promptly refuse any request, clearly;

Not use expressions such as "we will analyze it", "we need to decide it internally" or "I need my boss' approval";

Immediately stop interacting with the person requesting the Undue Advantage;

Immediately inform their boss and, in the case of Third Parties, inform the Employee responsible for the Third Party within the Company.

INTERACTION WITH THE GOVERNMENT AND PUBLIC UTILITY CONCESSIONAIRES

Whenever there is interaction with the Government, the following actions are expected:

To ensure a quorum of at least 2 representatives of the Company and/or authorized Third Parties, whenever possible;

To ensure the involvement of Company Employees and Third Parties with a hierarchical level compatible with that of the Government Official who will attend the Meeting or Hearing;

To use clear and objective language, avoiding ambiguities and subjective interpretations;

To adopt a formal means of communication, such as email.

Additional care should be taken regarding the attendance to meetings during non-routine interactions, such as negotiating or renegotiating financial contracts, or involving the discussion of sensitive matters. Such interactions, as a rule, entail additional risks and must observe, in addition to the conduct set out above, the following rules:

To align in advance with the manager responsible for the respective area before holding face-to-face meetings to address the company's strategic issues;

To prepare invitations and requests for Meetings and Hearings that must preferably be sent to the main authority of the Government body or agency.

INTERACTION WITH THE GOVERNMENT AND PUBLIC UTILITY CONCESSIONAIRES

To formally schedule the appointment, explaining:

the subject matter;

the Employees and Third Parties who will attend, also including the names of Government Officials and the bodies and/or agencies they work with;

Suggested date and time;

The subject matter under discussion shall be drawn up in the minutes or e-mail. The minutes or e-mail must bring clarity regarding the, but not limited to the, following topics:

Place or means of communication through which the Meeting or Hearing was held;

Date and time;

Summary of the matter discussed and resolutions adopted at the Meeting or Hearing;

Full name and title of those present at the Meeting or Hearing;

Signature or agreement of Employees or authorized third parties who attended the Meeting or Hearing.

OBTAINING LICENSES, CONSENTS, PERMITS AND CERTIFICATES

When obtaining such licenses, consents, permits and certificates as necessary, especially with regard to obtaining environmental licenses, the Company and its Employees shall always be guided by integrity and compliance with Anti-Corruption Laws.



UNDUE ADVANTAGE FOR PRIVATE PLAYERS

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FACILITATION PAYMENTS

What are these?

Payments made to Government Officials with the purpose of expediting or guaranteeing a routine, non-discretionary governmental act, such as, for instance, payments to expedite the issuance of environmental licenses.

THE COMPANY PROHIBITS MAKING FACILITATION PAYMENTS

The Company and its Employees do not offer, promise, give, or receive any Undue Advantage, or promise of Undue Advantage, directly or indirectly, from any Third Party, Investor or Private Player, whomever it may be - an individual or a corporation.

The Company also does not allow the offering, promise or acceptance of Gifts, Presents, Hospitalities or Entertainment Invitations that have, or may have, the objective of influencing or rewarding the Company's, Third Party's, or any other Private Players' business decision-making processes on the market.

DISCIPLINARY MEASURES

FORMAL WARNING



CONTRACT TERMINATION



Criteria: Breach Nature + Severity



WHISTLEBLOWING CHANNEL

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Any likely violation of the law or the terms of this Policy shall be immediately reported through the Company's Whistleblowing Channel, for appropriate assessment.

Any act of retaliation outside this procedure will also be subject to appropriate disciplinary measures.



CLOSING PROVISIONS

This Policy comes into effect on the date it is approved and any changes or revisions to this Policy shall be submitted to the Ethics Committee.

EXHIBIT

Third Parties: shall mean any business partner, supplier, service provider, consultant, agent, broker, representative, sponsor or any other party involved with the Company, who is not defined as Member, Customer or Government Official.

Government Official: shall mean both Domestic and Foreign Government Officials:
Domestic Government Official: shall mean any government officials, civil servants and everyone who exercises, even if temporarily or without compensation, by election, appointment, designation, hiring or any other form of investiture or bond, an office, position, job or function in the Executive, Legislative or Judiciary Branch, as well as the direct and indirect administration, within the scope of the Union, States, Cities and the Federal District, of a company incorporated into the public wealth, and of a private company for the creation or funding of which the Treasury has contributed or contributes in terms of wealth or revenue. **PLEASE NOTE:** Some energy distributors are state-owned companies, such as CELESC or CEMIG. Therefore, their employees shall be considered as government officials.

Foreign Government Official: Anyone who, even if temporarily or without compensation, holds a public office, position, job or function in state bodies, agencies or in diplomatic representations of a foreign country, as well as in legal entities controlled, directly or indirectly, by the Government of a foreign country, or in international public organizations.

Anti-Corruption Laws: shall mean (i) Law # 12,846/13, decrees and ordinances governing it; (ii) Law # 8,429/92 and Law # 14,230/21 - the Administrative Improbability Act; (iii) Law # 14.133/2021 - the Public Tenders and Government Contracts Act; and (iv) Law # 9613/1998, the Money Laundering Act.

Undue Advantage: shall mean any type of advantage promised, offered or given to a Third Party or Government Official, or to a third party related to a Government Official, regardless of the exchange of benefit or expectancy of benefit. Such advantage is not limited to cash payments, but may include, for instance, gifts, meals, entertainment, discounts and job offers.

EXHIBIT

Government: shall mean everybody, department or agency of the direct, indirect or foundational administration of any of the Federal, State or Local administrations, or an entity the creation or funding of which the Treasury has contributed or contributes to the revenue or wealth, such as: Health Surveillance Agency (Anvisa), Local or State Health Offices, etc.; State bodies or instrumentalities or diplomatic representations of a foreign country, as well as legal entities controlled, directly or indirectly, by the Government of a foreign country, or international public organizations. However, concession, consent or permit holders to whom a public asset or service has been delegated are not considered as Government.

Gifts: shall mean any items of low economic value and distributed in general, as a courtesy, advertisement or usual publicity. They are objects for corporate use, with no commercial value, such as notebooks, calendars and other types of accessories, of common and simple use, that have a brand indication.

Presents: shall mean any goods, services or advantages whatsoever that do not constitute a Gift or Hospitality. Items or expenses.

Hospitality: shall mean any service offers or expenses with transportation, food, lodging, courses, seminars, congresses, events, fairs or entertainment activities, granted by a private player to a Government Official in the institutional interest of the body or agency which such Government Official works with. **Donation:** shall mean any transfers of goods or values carried out with the sole purpose of supporting causes, with no consideration given, that is, nothing is given in return by the recipient who received the donation.

Political Donation: shall mean a donation to a candidate, political party or coalition, under the terms of the Elections Law.

Sponsorship: shall mean any transfer of values by the Company to a beneficiary, who, in return, advertises their brand or products. Sponsorships are usually related to sports, cultural or social projects.