

	<b>Competition Compliance Policy</b>	<b>Code:</b>	PL.CRP.CMP.005
		<b>PDCA:</b>	294
	<b>Compliance</b>	<b>Review:</b>	3
		<b>Date:</b>	20/03/2025

## REVIEW AND APPROVAL

This Policy was approved at the Meeting of the Board of Directors of ENEVA, held on 03/20/2025, and any amendment or revision must be submitted to it

Review	Date	Description of Updates
<b>00</b>	25/06/2016	Document creation.
<b>01</b>	01/06/2020	Document review.
<b>02</b>	11/02/2020	Document review.
<b>03</b>	20/03/2025	Document review for the update of Eneva's guidelines and commitments in relation to competition law compliance.

Prepared by	Review	Approval
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## SUMMARY

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## 1. PURPOSE

This Antitrust Compliance Policy ("Policy") aims to promote Eneva's independent conduct across all businesses and sectors in which it operates, serving as a guide for the behavior of all its employees and partners, in accordance with Brazilian antitrust regulations. This Policy was developed based on the Brazilian Antitrust Law ("LBDC"), the resolutions issued by the Administrative Council for Economic Defense ("CADE")<sup>1</sup>, the guidelines and case law of CADE's Tribunal<sup>2</sup>, as well as internationally recognized best practices.

## 2. APPLICATION

This document applies to all employees and areas within ENEVA's organizational structure, including joint ventures under its control, as well as to third parties who interact with or act on behalf of the company.

The provisions of this Policy complement the guidelines established by ENEVA's Code of Conduct, the Third-Party Code of Conduct, as well as other internal guidelines, policies, and published procedures.

## 3. REFERENCES


- **PL.CRP.CMP.002** – Code of Conduct
- **PL.CRP.CMP.003** – Anti-Corruption Policy
- **PL.CRP.SUP.001** – Procurement Policy
- **PL.CRP.RHU.002** – Compensation Policy
- **DT.CRP.CMP.002** – Conflict of Interest Guideline
- **DT.CRP.CMP.008** – Third-Party Code of Conduct
- **DT.CRP.CMP.007** – Guideline on Interaction with Public Authorities
- **DT.CRP.CMP.001** – Consequence Management Guideline
- CADE Resolutions<sup>3</sup>
- CADE Case Law

## 4. DEFINITIONS

<sup>1</sup> Source: <https://www.gov.br/cade/pt-br/aceso-a-informacao/normas-e-legislacao/resolucoes-1>

<sup>2</sup> Source: <https://jurisprudencia.cade.gov.br/>

<sup>3</sup> Source: <https://www.gov.br/cade/pt-br/aceso-a-informacao/normas-e-legislacao/resolucoes-1>

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- **Eneva S.A.:** 'Eneva' or 'Company'.
- **CADE:** Administrative Council for Economic Defense.
- **LBDC:** Law No. 12,529 of November 30, 2011
- **Cartel:** An explicit or implicit agreement between competing companies to fix prices, limit production, divide markets or customers, with the objective of eliminating competition and increasing profits.
- **Employees:** Any and all individuals or legal entities who may be or may become involved in the economic activities carried out by the company: shareholders, quota holders, board members, officers, directors, employees, service providers, business partners, and representatives.
- **Partners:** Any and all individuals or legal entities who may be or may become involved in the economic activities carried out by the company: shareholders, quota holders, board members, officers, directors, employees, service providers, business partners, and representatives.
- **Competitively sensitive information:** Information that may impact competitive decisions, such as: installed capacity, costs, strategies, revenue, non-public data, research and development, customer and supplier lists, expansion and acquisition plans, pricing, contract terms, production processes, trade secrets, salaries, tax and banking confidentiality, economic and financial situation, sales, and financial statements<sup>4</sup>.
- The other terms described throughout this policy will have their meanings defined in the Compliance Glossary created by Eneva.

## 5. PRINCIPLES AND GUIDELINES


### 5.1. Principles and Commitments

ENEVA is a company committed to Free Competition and to the best competitive practices, and therefore will not tolerate conduct that infringes the Antitrust Law, especially those involving improper contact with competitors.

Eneva reaffirms its commitment to the following principles:

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<sup>4</sup> Source: CADE's Gun Jumping Guide (Page 7) and Article 52 of CADE's Internal Regulations.

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- **Free Competition:** Promotion of competitiveness and innovation as essential elements for sustainable growth, without engaging in cartel practices or other actions that restrict market freedom.
- **Commercial Autonomy:** Ensuring that strategic and commercial decisions are made independently, guaranteeing impartiality in market relations and protection against anticompetitive practices.
- **Transparency:** Maintaining an ethical and clear approach, ensuring fair relationships with clients, suppliers, and partners, with a focus on preventing any behavior that may favor cartel agreements or information manipulation.
- **Prevention and Governance:** Implementation of robust processes for monitoring competitive risks and adopting corrective measures, especially in situations involving competitively sensitive information, in order to prevent cartel practices.

**Institutional Cooperation:** Encouraging responsible interaction with authorities and industry associations, aiming to contribute to the development of a balanced competitive environment free from practices that may constitute collusion or illegal market manipulation. In this context, the company acknowledges that cartel formation undermines fair and dynamic competition and may result in negative impacts for consumers and other economic agents.

Moreover, integrity in bidding processes is an essential principle for Eneva. Thus, the company reinforces its commitment to act ethically and transparently in both public and private tenders, ensuring equal opportunities and respect for competitive principles.

## 5.2 Market Relations


- **Interaction with Competitors**

Eneva adopts an ethical and compliant approach when interacting with competitors. Communications follow established standards, ensuring that information exchanges occur only within legal boundaries and for legitimate purposes.

- **Relationship with Partners and Suppliers**

Commercial interactions are conducted based on objective and equitable criteria. Eneva prioritizes relationships grounded in transparency and fairness, ensuring that its business practices do not compromise the competitive dynamics of the market.

- **Participation in Industry Associations and Sector Events**

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The company recognizes the importance of trade associations and events for the development of the sector and encourages the responsible participation of its representatives. To ensure that these spaces are used constructively, it adopts guidelines that promote discussions focused on innovation, best practices, and regulatory development.

- Commercial and Strategic Decisions

Eneva's strategies are based on market meritocracy, without any guidance rooted in practices that could artificially affect competition. All decisions are made independently and aligned with the principles of free enterprise.

- Interlocking Directorates

Employees holding management positions at ENEVA must assess whether occupying positions in competing companies may constitute a conflict of interest or an antitrust violation and, therefore, must comply with the company's internal regulations on the matter.

### 5.3. Governance Practices


To ensure the effectiveness of its competitive commitments, Eneva adopts continuous governance and improvement measures, including:

- Training and Awareness: Training sessions for all individuals involved in the company's activities on the topic of competition law compliance.
- Monitoring and Analysis: Internal processes for evaluating business practices, preventing antitrust risks.
- Communication Channels: Structured mechanisms for clarifying doubts and reporting concerns related to the topic.

### 5.4. Evolution and Continuous Improvement

Eneva is dedicated and committed to operating in compliance with the guiding principles and applicable competition laws, aiming to raise awareness, uphold, and promote the company's activities in a sustainable manner.

The unwavering commitment to conducting business in alignment with best antitrust practices is reaffirmed, with the aim of fostering a fair competition environment, protecting consumers, encouraging innovation, and contributing to sustainable economic development.

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Accordingly, Eneva periodically reviews and enhances this Policy, keeping pace with market best practices and regulatory updates, thereby ensuring an ethical, competitive, and transparent business environment.

### 5.5. Monitoring and Whistleblowing Channel

Eneva has internal mechanisms in place to identify antitrust risks and reinforce a culture of compliance.

All inquiries, investigations, and reports related to competition compliance must be directed to the Compliance department through the following channels:

Secure Line: [www.contatoseguro.com.br/eneva](http://www.contatoseguro.com.br/eneva) or 0800 601 8679;

Compliance E-mail: [compliance@eneva.com.br](mailto:compliance@eneva.com.br).

## 6. General Provisions

Failure to comply with the conduct outlined in this Policy and/or with applicable laws and regulations may result in the application of disciplinary measures to the responsible employees. Disciplinary measures will be proportional to the nature and severity of the violation and may range from a warning to termination for cause, without prejudice to applicable administrative, civil, and criminal sanctions, as provided by the relevant legislation.

It is worth noting that Third Parties contracted by ENEVA who engage in violations of this Policy or of applicable laws and regulations will be subject to the measures set forth in the respective contract, including the termination of the commercial relationship between ENEVA and the Third Party, without prejudice to applicable administrative, civil, and criminal sanctions, as provided by the relevant legislation.