POLICY FOR THE DISCLOSURE OF

MATERIAL INFORMATION

AND THE TRADING OF SECURITIES

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1. PURPOSE

To establish the governing principles for information disclosure and use and for trading in securities issued by ENGIE Brasil Energia S.A. (“Company”), pursuant to Brazilian Securities Exchange Commission (CVM) Resolution No. 44, from August 23, 2021.

2. PRINCIPLES

2.1 APPLICATION

2.1.1 The present Policy shall apply to:

a) Managers, members of the Fiscal Council, members of any bodies with technical or consultative functions created by statutory provision, and employees of the Company who, by virtue of their position or function, have access to material information.

NOTE 1: The term “Managers" shall include Officers and members of the Board of Directors.

NOTE 2: The term “material information” or “material act/fact”, pursuant to Article 155, Par. 1, of Law No. 6404/1976 and Article 2 of CVM Resolution No. 44/2021 shall designate any (i) decision of the controlling shareholder; (ii) decision of the General Meeting or of the managers; or (iii) any other act or fact of a political-administrative, technical, business, or economic-financial nature that has taken place or that has a bearing on the Company’s business that may materially influence:

- the trading prices of the securities issued by the Company or prices pegged thereto;
- investors’ decision to buy, sell or hold such securities; or
- investors’ decision to exercise any rights inherent to the holders of securities issued by the company or pegged thereto.

b) Controlling shareholders.

NOTA: The terms "controlling shareholders" or "controlling entity" shall include the shareholder or group of shareholders bound by a shareholders’ agreement or under common control that exercise controlling power over the Company pursuant to the contents of Law No. 6404/1976 as amended.

c) Shareholders or groups of shareholders with a direct or indirect stake of at least 5% (five percent) of the Company’s equity capital, to be referred to hereinafter as “shareholders”.

d) Managers, members of the Fiscal Council, members of any bodies with technical or consultative functions, and employees of the Controlling Entity and of Subsidiaries and Affiliates that, by virtue of their position or function, have access to material information.

NOTE 1: The term “Subsidiaries” shall include entities in which the Company, whether directly or through other subsidiaries, holds ownership rights entitling it, in a permanent manner, to prevalence in corporate decisions and to the power of electing a majority of Managers.

NOTE 2: The term “Affiliates” shall include entities in which the Company holds a stake of 10% (ten percent) or more, but does not hold control.

e) Natural or legal entities not mentioned in letters “a”, “b”, “c”, and “d” of the present item with access to material information because of their professional functions.

2.2 MISCELLANEOUS

2.2.1 All of those listed in 2.1 must enter into the Declaration of Compliance with the present policy, pursuant to Articles 15, 16 and 17, of CVM Resolution No. 44/2021, according to the template provided as Attachment 1 hereto. Said Declaration shall be kept on file at the Company's registered offices for as long as each said person maintains a link with it, and for a minimum period of five years thereafter.

2.2.2 Employees of the Controlling Entity who have access to material information by virtue of their position or function shall be exempted from entry into the Declaration of Compliance because of their mandatory acceptance of the equivalent Group policy.

2.2.3 The Company shall keep at its registered offices and available to the CVM a current list of persons who have entered into the Declaration of Compliance, along with the respective description, position or function, address, and enrollment number before the Ministry of Finance's National Legal Entities Registry CNPJ or Natural Entities Registry – CPF.

2.3 DISCLOSURE OF MATERIAL INFORMATION

2.3.1 It shall be the responsibility of the Company's Investor Relations Officer to send any act of fact that has occurred or has a bearing on the Company's business and is deemed material information to the CVM and, if applicable, to the managing entities of the markets where the Company's securities are traded, immediately upon gaining awareness of such an act or fact.

2.3.2 Announcement of material information to the CVM shall take place immediately upon awareness, through an electronic system available on the CVM website on the world wide web.

2.3.3 Disclosure of material information shall take place at least, in one of the following communication channels: (i) newspaper of great circulation used regularly by the Company; (ii) on news portals with Web pages that offer the entire information free of charge, that is, < https://www.ibri.com.br/pt-br/rede-de-divulgacao/>; and (iii) on <http://www.engie.com.br/investidores>, with contents at least identical to those provided to the CVM and other financial and capital markets entities. Publication of a material act or fact may, at the discretion of the Investor Relations Officer, be in summary format, with a notice that the full information may be viewed on the Company's Website, at the foregoing Web address.

2.3.4 Any material information published on any medium shall be simultaneously disclosed to the CVM and in all markets where the Company's securities are admitted to trading. This shall include press releases or information provided in meetings with trade entities, investors, analysts or with a selected public, domestically or abroad.

2.3.5 The persons entering into Declarations of Compliance and who gain awareness of material information shall immediately provide such information to the Investor Relations Officer. Said persons shall also make sure that the material information is disclosed by the Investor Relations Officer and, upon finding that said Officer has failed to disclose, shall provide the material information directly to the CVM.

2.3.6 The relevant information shall preferably be disclosed before the market's opening or after closing hours for trading on the Stock Exchanges or organized Over-the-Counter entities where the Company's securities are admitted to trading. In the event of incompatible trading hours in different national markets, the trading hours of the Brazilian market shall prevail.

2.4 EXCEPTION TO THE IMMEDIATE DISCLOSURE OF MATERIAL INFORMATION

2.4.1 Acts or facts amounting to material information may not be disclosed if the controlling shareholders or Managers understand that disclosure thereof may jeopardize the Company's legitimate interests.

2.4.2 The controlling shareholders or Managers may submit to the CVM their decision to, under exceptional circumstances, maintain secrecy over acts or facts whose disclosure to the investing public may jeopardize the Company's legitimate interests.

2.4.3 Exceptions to the situation described in 2.4.1 shall include (i) the controlling shareholders or Managers losing control over material information kept under secrecy; and (ii) the occurrence of atypical changes in the quotation, price or trading volume of the securities issued by the Company. In these cases, the foregoing persons shall be required to directly or through the Investor Relations Officer male sure that the material information is immediately provided to the CVM and markets management entities in which the securities issued by the Company are admitted to trading.

2.5 SECRECY

2.5.1 The persons entering into the Certification of Compliance shall maintain secrecy over material information to which they have privileged access because of the position he holds until such material information is disclosed to the market and shall make sure that their subordinates and third parties maintain secrecy.

2.5.2 The persons entering into the Certification of Compliance shall restrict the discussion of material information in public places.

2.5.3 The persons entering into the Certification of Compliance shall immediately give notice to the Company's Investor Relations Officer of any breaches of the present Policy.

2.5.4 The use of material information not yet disclosed, by any person who has had access to it, with the purpose of obtaining an advantage, for himself or for others, through the negotiation of securities is prohibited.

2.5.5 It is assumed that (i) the person who traded securities having material information not yet disclosed, made use of such information in said trade; (ii) controlling shareholders, direct or indirect, directors, members of the board of directors and the fiscal council and the Company itself, in relation to business with securities issued by itself, have access to all relevant information not yet disclosed; (iii) the persons listed in item (ii), as well as those who have a commercial, professional or trusting relationship with the Company, having had access to material information not yet disclosed, they know that it is privileged information and; (iv) the manager who leaves the company with relevant and not yet disclosed information makes use of such information if he trades securities issued by the company within a period of 3 (three) months from his departure.

2.6 DISCLOSURE OF INFORMATION IN PUBLIC OFFERINGS

2.6.1 The Investor Relations Officer shall disclose, immediately upon the Company's decision to hold a public offering that requires registration before the CVM, the number of securities issued by the Company to be acquired or sold, the prices, payment terms, and other conditions to which the offering is subject, pursuant to the contents of item 2.3.3 of the present Policy.

2.7 DISCLOSURE OF INFORMATION ON TRADING OF SECURITIES ISSUED BY THE COMPANY

2.7.1 The Company's Managers, members of the Fiscal Council and members of any bodies with technical or consultative functions created by statutory provision shall disclose ownership of securities issued by the Company, such as shares and debentures, whether they are held in their own names or in the names of Connected Persons, as well as any changes to their holding positions.

NOTE: The term "Connected Persons" shall include persons with the following ties with the Company's Managers, members of the Fiscal Council and members of any bodies with technical or consultative functions created by statutory provision:

a) spouse without legal or extrajudicial separation, or companion;

b) any dependents listed as such in annual tax adjustment returns; and

c) entities directly or indirectly controlled by whether Managers, members of the Fiscal Council and members of any bodies with technical or consultative functions created by statutory provision and similar persons or by the persons mentioned in foregoing letters "a" and "b".

2.7.2 The disclosure mentioned in item 2.7.1 shall be submitted to the Company's Investor Relations Officer at the e-mail address ri.brenergia@engie.com. It shall be the Investor Relations Officer's duty to forward the disclosure to the CVM and, as the case may be, to the entities managing the markets in which the securities issued by the Company are admitted to trading using the template form provided as attachment 2 hereto.

2.7.3 The disclosure mentioned in item 2.7.1 shall be made (i) immediately upon investiture; and (ii) within a period of 5 (five) days from each trade.

2.7.4 Infrastructure debentures, instituted under Law 14.801/2024 (Debentures instituted under Law 14.801), **may not be acquired** by a Person Connected to the Company, including such persons resident or domiciled abroad.

NOTE: Exclusively for the purposes of the Debentures instituted under Law 14.801, is considered a Person Connected to the Company:

I – natural persons that are:

a) direct or indirect controllers, shareholders with more than 10% (ten percent) of the shares with voting rights, or Managers of the Company;

b) spouses or partners of the referred persons in line "a" above; and

c) relatives up to second degree, including by affinity, of the referred persons in line "a" above.

II – the legal entities which are controllers, subsidiaries or affiliates, pursuant to paragraphs 1 and 2, Article 243 of Law 6.404 of December 15, 1976; and

III – the funds of which any of the natural persons or legal entities under items I and II of this paragraph is a quotaholder, holder of more than 10% (ten percent) of the relative quotas.

2.8 DISCLOSURE OF INFORMATION ON THE ACQUISITION OR DISPOSAL OF A MATERIAL EQUITY STAKE

2.8.1 The Company's Controlling Shareholders and Shareholders shall disclose to the Investor Relations Officer the acquisition or disposal of a material equity stake.

NOTE: A material equity stake shall be deemed the business or set of businesses through which the direct or indirect interest of the persons referred to in item 2.8.1 exceeds, upwards or downwards, the levels of 5% (five percent), 10% (ten percent), 15% (fifteen percent), and so on, of a type or class of the Company's shares of equity stock.

2.8.2 The disclosure of acquisition or divestment of a material equity stake shall be forwarded to the CVM and, as the case may be, to the entities managing the markets in which the Company's shares are admitted to trading, containing the information listed in Attachment 3 hereto.

2.8.3 The disclosure to the CVM and, as the case may be, to the entities managing the markets in which the Company's shares are admitted to trading, shall be forwarded immediately upon achievement of the equity stake mentioned in item 2.8.1, and disclosure shall be made by the Investor Relations Officer, who shall also be responsible for immediately updating the relevant field of the Reference Form as instituted by CVM Instruction No. 480/2009, as amended.

2.9 TRADING IN THE COMPANY'S SECURITIES

2.9.1 The persons who have entered into the Certification of Compliance and who are aware of certain material information shall be barred from trading in the securities issued by the Company before the disclosure to the investing public, as provided herein, of said material information.

2.9.2 The persons who have entered into the Certification of Compliance and who cease to hold positions in the Company's management or to maintain ties with the Company before the

disclosure of material information originated while they still held said position and/or maintained said ties shall be barred from trading in securities issued by the Company for a period of 3 (three) months from the date when they cease to hold the position or maintain ties, or until the disclosure to the investing public of the material information, whichever occurs first.

2.9.3 The present Policy's prohibitions include trades conducted directly and indirectly by the persons who have entered into the Certification of Compliance, with the exception of such trades as conducted by investment funds where such persons have shares, as long as they are not exclusive investments funds, or investment funds whose portfolio manager's trading decisions are directly influenced by persons who have entered into the Certification of Compliance.

2.9.4 The persons who have entered into the Certification of Compliance shall make sure that those persons with whom they maintain commercial, professional or confidence ties shall not trade in the relevant securities where they have had access to as-yet undisclosed material information. To this end, the persons entering into the Certification of Compliance shall cause all of those who gain access to material information to enter into the Certification of Compliance.

2.9.5 Trading in securities issued by the Company shall be forbidden to persons who have entered into the Certification of Compliance whenever a process of acquisition or disposal of the Company's securities is underway, where such a process is not publicly known, and where an agreement has been entered for the transfer of a controlling stake in the company, or where an option or mandate has been granted to this end, as well as in the presence of plans of takeover, full or partial spin-off, transformation or corporate reorganization of the Company, until such a process has been completed.

2.9.6 The persons who have entered into the Certification of Compliance shall abide by the securities trading prohibitions until the disclosure of the material information to the market. However, such prohibitions shall stand, even after the disclosure of the material information, where trades in securities issued by the Company on the part of persons who have entered into the Certification of Compliance may interfere with the act or fact associated with said material information in such a manner that may cause damages to the Company or its shareholders.

2.9.7 The persons who have entered into the Certification of Compliance shall refrain from any trades in securities issued by the Company, including, but not limited to securities' rental, donation, and lending operations, whether in the position of lessor, donor, lender/creditor, lessee, donee or borrower/debtor, for a period of thirty (30) days preceding the disclosure of Quarterly Information – ITR e and of (annual) Standard Financial Statements – DFP. However, securities issued by the Company may be traded by the controlling shareholders, Managers, members of the Fiscal Council, members of any bodies with technical or consultative functions created by statutory provision, and/or related persons within the period mentioned above if in accordance with an investment plan previously formalized in writing before the Company's Investor Relations Officer, pursuant to the conditions, formalities and periods provided in Articles 15 and 16 of CVM Resolution No. 44/2021.

NOTE: The prohibition in item 2.9.1 shall not apply to the purchase of Treasury shares by means of private trades associated with the exercise of call options in line with the options granting plan as approved by the General Meeting.

NOTE: The investment plans mentioned in item 2.9.7 may allow trading in securities issued by the Company within the period provided in said item, as long as formally communicated in writing to the Investor Relations Officer before any trades are conducted, establishing the dates, amounts, or volumes of the trades to be conducted, with a minimum waiting period of 3 (three) months before the plan itself, amendments thereto, and cancellation thereof enter into force. Participants shall be barred from keeping more than one investment plan in force at any given time and from conducting any operations to nullify or mitigate the economic effects of operations under the investment plan.

2.9.8 The activities of the signatories of this Policy in the market of lending of Securities, the issue of the Company, is permitted, whether in the quality of lender/creditor or borrower/debtor of the loan, conditional on compliance with the rules determined for the trading in Company's securities, described from item 2.7 to 2.9.

2.10 PENALTIES

2.10.1 All of the persons who have entered into the Certification of Compliance shall abide by and comply with every disposition under the present Policy. Failure to comply shall render such persons subject to the penalties under Law No. 6385/76 and in CVM Resolution No. 44/2021.

2.10.2 Without prejudice to the provision in the applicable legislation, in the event of non-compliance with the prohibitions set forth in 2.7.4, the Person Connected to the Company, acquirer of Debentures as instituted under Law 14.801 shall be subject to a fine equivalent to 20% (twenty percent) of the value of the debentures acquired and of the income due therefrom whether received or credited.

2.11 AMENDMENTS

2.11.1 Any amendment to the present Policy shall require the approval of the Company's Board of Directors and shall be disclosed to the CVM and, as the case may be, to the entities managing the markets in which the Company's shares are admitted to trading.

2.12 EXECUTIVE AND MONITORING RESPONSIBILITY

2.12.1 The Investor Relations Officer shall be responsible for executing and monitoring the present Policy.

3. ATTACHMENT

3.1 ATTACHMENT 1 – CERTIFICATION OF COMPLIANCE

Certification of Compliance with ENGIE Brasil Energia S.A.'s Information Disclosure and Trading of Securities Policy

I, [name, nationality and marital status], bearer of ID document No. [number and issuing authority], enrolled before the tax authorities under Taxpayer ID CPF/MF No. [No.], with place of residence and domicile at [address], as [position, function or ties with the Company] of ENGIE Brasil Energia S.A., with registered offices at Rua Paschoal Apóstolo Pítsica, 5064, in the city of Florianópolis, state of Santa Catarina, enrolled before the tax authorities under Taxpayer ID CNPJ No. 02.474.103/0001-19, hereby declare and certify full awareness of ENGIE Brasil Energia's Information Disclosure and Trading of Securities Policy. I shall comply with said Policy, keep abreast, and inform spouses or partners, dependents and relatives up to the second degree, including by affinity of any amendments thereto or replacements thereof, obligations and duties, and it is the Company's responsibility to make available on its website (www.engie.com.br/investidores) the most recent version of said Policy, and shall conduct myself permanently in accordance with said Policy and with the Company's values, Code of Ethics, and Information Security Policy, as well as with CVM Resolution No. 448/2021, and with Law No. 14.801, of January 9, 2024.

[place and date of entry into the Certification]

[name of the Certifying party]

Witnesses:

1.
Name:
R.G.:
CPF:

2.
Name:
R.G.:
CPF:

3.2 ATTACHMENT 2 – MINIMUM INFORMATION TO BE DISCLOSED IN TRADES CONDUCTED BY MANAGERS, MEMBERS OF THE FISCAL COUNCIL AND MEMBERS OF ANY BODIES WITH TECHNICAL OR CONSULTATIVE FUNCTIONS CREATED BY STATUTORY PROVISION, SHAREHOLDERS AND RELATED PERSONS

1. name and description of the disclosing party, indicating his/her/its registration number before the Corporate (CNPJ) or Individual (CPF) Taxpayer's registry;

2. number, by type and class, for stock trades, and other characteristics, for other securities, in addition to the Company's identification and the balance of the position held before and after the trade; and

3. form of acquisition or disposal, price and date of the trades.

Natural entities shall also indicate securities issued by the Company and held by a spouse from whom they are not legal or extrajudicial separated, by companions, by any dependents listed as such in annual income tax adjustment returns, and by directly or indirectly controlled entities.

The template form to be completed shall be as follows:

Schedule 1 – template form

Name of the Controlled Entity:							
Name:					Taxpayer ID (CPF/CNPJ):		
Description:							
Starting Balance							
Security/ Derivative	Characteristics of the Securities(1)				Quantity	% stake	
						Same Type/ Class	Total
Trades in the Month – list every purchase or sale operation conducted in the month (day, quantity, price and volume)							
Security/ Derivative	Characteristics of the Securities(1)	Intermediary	Operation	Day	Quantity	Price	Volume (R$) (2)
			Purchase				
			Total purchases				
			Sale				
			Total sales				
			Rent				
			Total rent				
Ending Balance							
Security/ Derivative	Characteristics of the Securities(1)				Quantity	% stake	
						Same Type/ Class	Total

(1) Issue/series, convertible, simple, maturities, guarantees, type/class, etc.
(2) Quantity x price.

3.3 ATTACHMENT 3 – INFORMATION TO BE DISCLOSED ON THE ACQUISITION OR DISPOSAL OF A MATERIAL EQUITY STAKE AND ON TRADES CONDUCTED BY CONTROLLING SHAREHOLDERS AND SHAREHOLDERS

1. name and description of the acquiring party, indicating the Corporate (CNPJ) or Individual (CPF) Taxpayer ID;

2. purpose of the intended stake and quantity, including, as the case may be, a statement from the acquiring party that the purchase is not intended to alter the Company's ownership structure or management structure;

3. number of shares, warrants, and stock subscription rights and put options, by type and class, that the acquirer or any related persons may already hold, whether directly or indirectly;

4. number of convertible debentures that the acquirer or any related persons may already hold, whether directly or indirectly, indicating the number of shares broken down by type and class, to be gained from a potential conversion; and

5. indication of any agreement governing the exercise of voting rights or the purchase or sale of securities issued by the Company.