

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attached.

Multiple horizontal lines for providing details for question 17.

18 Can any resulting loss be recognized? ▶ See attached.

Multiple horizontal lines for providing details for question 18.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See attached.

Multiple horizontal lines for providing details for question 19.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here Signature ▶  Date ▶ January 15, 2024

Print your name ▶ Daniel Pimentel Siaviero Title ▶ CEO

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|-------------------------------|----------------------------|----------------------|------|---|------|
| Paid Preparer Use Only | Print/Type preparer's name | Preparer's signature | Date | Check <input type="checkbox"/> if self-employed | PTIN |
| | Firm's name ▶ | | | Firm's EIN ▶ | |
| | Firm's address ▶ | | | Phone no. | |

COPEL – Form 8937

14. Companhia Paranaense de Energia – COPEL (the "Company") cancelled its Units, which were comprised of a combination of four class B preferred shares of the Company (the "Preferred Shares") and one common share of the Company (the "Common Share") and delivered to holders the Preferred Shares and Common Shares that comprised the Units (the "Unwinding") on or about December 28, 2023.

In connection with the Unwinding, the Company (i) converted each American depositary share representing one Unit (the "Original ADS") into one American depositary share representing four Preferred Shares (the "Preferred Share ADS") and (ii) concurrently distributed to each holder of Original ADS one quarter of a American depositary share representing four Common Shares (the "Common Share ADS").

The transactions described in (i) and (ii) are collectively referred to herein as the "Exchange."

No changes were made to the Company's Preferred Shares or Common Shares.

15. No changes were made to the Company's Preferred Shares or Common Shares. Accordingly, the Exchange did not result in any change to a taxpayer's basis in the Preferred Shares or Common Shares represented by the Original ADSs held by the taxpayer.

No fractional Common Share ADSs were issued in connection with the Exchange. Instead, fractional entitlements to Common Share ADSs were aggregated and sold by the depositary bank and the net cash proceeds from the sale of the fractional Common Share ADS entitlements (after deduction of fees, taxes and expenses) were distributed to the applicable Original ADS holders by the depositary bank. It is understood that DTC and DTC participants will follow a similar process so that no fraction of a Common Share ADSs will be delivered to any DTC participant or any account holder.

16. There was no change to the taxpayer's basis in the Company's Preferred Shares or Common Shares and a taxpayer's aggregate basis in the Company's Preferred Shares and Common Shares represented by the Preferred Share ADS and Common Share ADS should be equal to the taxpayer's aggregate basis in the Company's Preferred Shares and Common Shares underlying the Original ADS (subject to the discussion of fractional Common Share ADSs above).

Holders that acquired their Original ADSs on different dates and/or at different prices should consult their tax advisors regarding the allocation of their tax basis in the Company's Preferred Shares and Common Shares to the Preferred Share ADS and Common Share ADS.

17. Although not free from doubt, the Company does not believe that the Exchange is a realization event under section 1001 of the Internal Revenue Code of 1986, as amended (the "Code") or a distribution under either section 305 or 301 of the Code.

If the Exchange, however, were considered to be a realization event, it should qualify for non-recognition under section 1036 of the Code.

Gain or loss recognized as a result of a holder having received cash in lieu of fractional Common Share ADSs is determined under section 1001 and 1012 of the Code.

Original ADS holders should consult their own tax advisors regarding the U.S. federal income tax treatment of the Exchange.

18. An Original ADS holder generally will not recognize gain or loss as a result of the Exchange. An Original ADS holder that received cash in lieu of fractional Common Share ADSs will generally recognize gain or loss equal to the difference between the amount of cash received and the holder's adjusted tax basis in the Common Shares represented by the fractional Common Share ADSs. Such gain or loss will be capital gain or loss if the Original ADSs were held as capital assets by the holder.

19. For a holder whose taxable year is the calendar year, the reportable tax year is 2023.