

Version 07 dated 04/16/2025

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1. INTRODUCTION

Copel, as a publicly traded company with shares listed on B3 (CPLE3, CPLE5, CPLE6), the NYSE (ELPVY, ELP), and LATIBEX (XCOP), is subject to capital market regulation, and must establish mechanisms that require regular use of Insider Information by Related and Affiliated Persons in trading in securities issued by the Company and transparency in the disclosure of Material Information to the Company and its investors.

Accordingly, in compliance with regulation and best governance practices, Copel has established this Policy, which is approved by the Board of Directors (CAD, *Conselho de ADministração*).

1.1 - SCOPE

The scope of this Policy defines Copel's guidelines for the topics of Disclosure of Information and Preservation of Secrecy and Trading in Securities Issued by the Company.

1.2 - CONCEPTS

The terms used in this policy are conceptualized and organized in the Concept Book which can be accessed on the Investor Relations website (ri.copel.com) and on the Copel Sustainability Portal.

1.3 - PURPOSE

To establish the rules, procedures and guidelines for the disclosure of information and preservation of secrecy, trading of securities issued by the company, applicable to Companhia Paranaense de Energia - Copel (Holding), its wholly-owned subsidiaries - SIs, its subsidiaries and Related Persons. For the purposes of this Policy, the set of these related companies will be called Copel.

The guidelines are also applicable, as a recommendation, to joint subsidiaries, affiliated companies and other corporate interests, respecting their corporate processes.

To support the execution of the general guidelines, Copel separates the specific guidelines for each chapter of this policy. These guidelines address information disclosure and the preservation of confidentiality and trading in self-issued securities.

1.4 - GENERAL GUIDELINES

- 1.4.1 Related Persons must adhere to this Policy by signing the Term of Adhesion, in the form of Annex I.
- 1.4.2 The Terms of Adhesion signed by the Related Persons must remain filed at the Company's headquarters, under the responsibility of the Vice President of Finance and Investor Relations (VPFI), as long as these persons maintain ties with Copel and also for at least 5 (five) years after their dismissal.
- 1.4.3 The Company will keep the updated list of Related Persons who sign the Terms of Adhesion, on file at its headquarters, under the responsibility of the VPFI, and at the disposal of the Securities and Exchange Commission (CVM Comissão de Valores Mobiliários), with their respective qualifications, position or function, and their registration number in the National Register of Individuals and/or Legal Entities, as applicable, updating it whenever there is a change.
- 1.4.4 It is the responsibility of the Related Person to immediately notify the Company of any change in any of their registration data.
- 1.4.5 The business management area in which Copel owns equity interests will be responsible for collecting the signatures of the Terms of Adhesion of the Related Persons of Subsidiaries, Affiliates and other companies in which the Company has an interest, if they adopt this policy.
- 1.4.6 Related Persons must observe the standards applicable to this Policy, as well as ensure that such standards are complied with by the persons under their influence, including Affiliated Persons and all those with whom they have a business, professional or trust relationship.



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CHAPTER 1: DISCLOSURE OF INFORMATION AND PRESERVATION OF CONFIDENTIALITY

1.1. PURPOSE

To establish the guidelines for disclosure of information, which are considered as Material Acts or Facts, and for maintaining the confidentiality of Inside Information, which guide the decision-making process of Copel.

1.2. ATTRIBUTIONS OF THE VICE PRESIDENT OF FINANCE AND INVESTOR RELATIONS - VPFI

- 1.2.1 Without prejudice to the other duties and responsibilities provided for in the applicable rules, the Bylaws and in this Disclosure Policy, the VPFI, through the Superintendence of Investor Relations (SRI, *Superintendência de Relações com Investidores*), must:
 - a) disclose and communicate to the CVM and to the Stock Exchanges, immediately after its awareness and analysis, in accordance with applicable rules, any Material Information;
 - b) ensure the broad and immediate dissemination of Material Information simultaneously, whenever possible, in all markets in which Copel has securities admitted to trading;
 - c) in the event of questions from the CVM or the Stock Exchanges, or in the event of an unusual fluctuation in the quote, price or quantity of the Securities traded, question the persons with access to Inside Information to determine whether they are aware of information that must be disclosed to the market and, if so, ensure that the information is immediately disclosed to the market in accordance with this Policy, and keep a record of this procedure;
 - d) in compliance with the provisions of this Policy, analyze and decide on the characterization of fact or act as Material Information and participate in the decision-making process regarding the convenience or not of its immediate disclosure to the market; and
 - e) administer and enforce this Policy.

1.3. DUTIES OF RELATED PERSONS

- 1.3.1 Without prejudice to the other duties and responsibilities provided for in applicable legislation and regulations, as well as in this Disclosure Policy, the following are the obligations of the Related Persons:
 - a) Immediately and formally communicate any Material Information of which they are aware to VPFI, who will promote its disclosure in accordance with the applicable rules and this Disclosure Policy;
 - b) not disclose the Inside Information, except for strict disclosure to those persons who need to know it, ensuring that the recipients of the information are subject to this Policy or otherwise subject to an obligation to safeguard the confidentiality of the information and refrain from using it to gain improper advantage;
 - c) not rely on Inside Information to obtain, directly or indirectly, for themselves or third parties, any advantages, including through the purchase or sale of Securities;
 - d) not discuss Inside Information in the presence of third parties who are not aware of it, even if it can be expected that such third party cannot intuit the meaning of the conversation;
 - e) Directors, Tax Advisors and members of Bodies with Technical or Advisory Functions, if they have personal knowledge of Material Information, whenever they verify the failure of the VPFI in fulfilling their duty to disclose the respective Material Act or Fact, must immediately report such Material Act or Fact to the CVM;
 - f) if they inadvertently or without authorization, in any way communicate, personally or through third parties, Inside Information to persons not bound by this Disclosure Policy or subject to a duty of secrecy, they must immediately report such act to the VPFI so that they can take the measures they deem appropriate;
 - g) immediately report to the VPFI any violations of this Disclosure Policy of which they become aware; and



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h) ensure that the violation of the provisions of the above items does not occur through direct subordinates or third parties of their trust, being jointly liable with them in the event of non-compliance.

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- 1.3.2 Related Persons are prohibited from providing or commenting in the media, by any means of communication, including through the Internet or social media, any Inside Information to which they have had access due to their position or function until its disclosure to the public.
- 1.3.2.1 It is also prohibited to make any public statement regarding news published by the press on issues dealt with at meetings of the management bodies, committees or any administrative area of the Company, which have not been the subject of prior official pronouncement through the VPFI.

1.4. PROCEDURES FOR DISCLOSING MATERIAL INFORMATION

- 1.4.1 The disclosure of Material Information to the CVM and to the Stock Exchanges must be made immediately, observing item 1.4.2 below and except for the hypotheses in section 1.6, by means of a written document, with the appropriate detailing of the acts and/or facts that occurred.
- 1.4.1.1 The disclosure of Material Information must be made in a clear and precise manner, in language accessible to the investing public, indicating, whenever possible, the amounts involved and other clarifications that the Company considers relevant for the proper understanding and more accurate evaluation of Material Information by the market.
- 1.4.2 The disclosure of Material Information will be carried out, whenever possible, before the start or after the close of business on the Stock Exchanges, observing that, if there is simultaneous trading on more than one Stock Exchange in different countries, the operating hours of the Stock Exchanges located in the Brazilian territory shall prevail.
- 1.4.2.1 If it is imperative that the disclosure of Material Information should occur during trading hours, the VPFI may request, always simultaneously with the Stock Exchanges, the suspension of trading of Copel Securities, for the time necessary for the proper dissemination of Material Information, in compliance with the procedures provided for in the regulations issued by the Stock Exchanges.
- 1.4.3 Under the terms of applicable regulations, the disclosure of Material Information must be carried out through the following channels:
 - a) electronic system available on the CVM website;
 - b) the Company's investor relations page; and
 - c) on the "PortalMZ" news portal, whose electronic address is <u>portal.mzgroup.com</u>.
- 1.4.3.1 The Company may create an online information disclosure system for investors by sending Material Information via electronic mail (email) from persons registered in a database created for this purpose, observing that such disclosure system will not replace the other means of disclosure of information provided for in this Disclosure Policy and applicable law.
- 1.4.3.2 In the event of a change in the communication channels of sub-item 1.4.3, this Disclosure Policy must be updated prior to the change.
- 1.4.4 In the event of the dissemination of Material Information by any means of communication, including to the press or at meetings with class entities, shareholders, investors, analysts or with a select public, in the country or abroad, the Material Information must be disclosed prior and simultaneously to the CVM, Stock Exchanges and to the general investing public through the official channels mentioned in item 1.4.3.

1.5. EXCEPTION TO THE IMMEDIATE DISCLOSURE OF A MATERIAL ACT OR FACT

1.5.1 - Material Information may, exceptionally, no longer be disclosed, after analysis and decision by the VPFI or other Directors, as the case may be, when they believe that its disclosure may put the Company's legitimate interest at risk.



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- 1.5.1.1 In the form of applicable regulations, the Directors may decide to submit a question about the disclosure of Material Information to the public that may put the Company's legitimate interest at risk to the CVM.
- 1.5.1.2 The Directors are obliged, directly or through the VPFI, to immediately disclose the Material Information in the event that the information should escape control or an atypical fluctuation should occur in the price, quote or quantity of Securities traded.

1.6. Notice to the Market

- 1.6.1 If the Company believes it is pertinent to disclose any useful information to shareholders and the market in general, even if it is not required by applicable laws and regulations, the Company will bring said information to the knowledge of its shareholders and investors through a Notice to the Market.
- 1.6.1.1 If the Company believes that the information to be disclosed through a Notice to the Market has the potential to influence, in a considerable manner, the quotes or investment decisions in its Securities, such information should be treated internally and disclosed in the manner required for Material Information.
- 1.6.2 The disclosure of a Notice to the Market must be made by means of a written document to the CVM and the Stock Exchanges, with clear precise, objective and accessible language to the investing public, describing in detail the acts and/or facts that occurred and indicating, whenever necessary and possible, the amounts involved and other clarifications.
- 1.6.3 Disclosure of a Notice to the Market must be made through the following channels:
 - a) electronic system available on the CVM website;
 - b) the Company's investor relations page; and
 - c) online information disclosure system to investors through electronic mail (email) of people registered in a database created for this purpose.

CHAPTER 2: TRADING IN SECURITIES ISSUED BY THE COMPANY

2.1. PURPOSE

To establish the guidelines for trading in securities issued by the company, aiming to promote transparency and regularity of trading and avoiding the misuse of Inside Information, which guides Copel's decision-making process.

2.2. SPECIFIC GUIDELINES

- 2.2.1 This Policy applies to trading in Securities carried out by the Company and other Related Persons:
 - a) In or outside of regulated securities market environments;
 - b) directly or indirectly, whether through controlled companies or third parties with whom a trust or portfolio administration contract is maintained; and
 - c) on its own behalf or on behalf of third parties.
- 2.2.2 The restrictions set forth in this Policy do not apply to trading carried out by investment funds of which the Related Persons are shareholders, provided that the trading decisions of the administrator and/or manager of these funds cannot be influenced by the shareholders, and such influence is presumed if it is an exclusive fund, subject to the exceptions contained in CVM Resolution 44.

2.3. PROHIBITION AGAINST INSIDER TRADING

2.3.1 - Trading of Copel Securities by Related Persons who are aware of Inside Information, for the purpose of obtaining an undue advantage, for themselves or for others, is prohibited.



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- 2.3.2 For the purposes of the restriction contained in item 2.3.1, it is assumed that:
 - a) the person who trades Securities while having Insider Information makes use of such information in said trading;
 - b) Directors, members of the Audit Committee and the Company, in relation to the Securities business, have access to all Inside Information:
 - c) the Related Persons, when accessing Inside Information, know that it is Inside Information;
 - d) the Administrator who leaves the Company with Inside Information uses such information if they trade Securities within 3 (three) months of their departure;
 - e) are relevant, from the moment studies or analyses on the subject begin, information about incorporating operations, total or partial spin-offs, mergers, transformation, or any form of corporate reorganization or business combination, changes in the control of the Company, including through entering into, changing or terminating shareholder agreements, decisions to promote the cancellation of the registration of the publicly-held company or changes in the environment or trading segment of the shares issued by it; and
 - f) information about the request for judicial or extrajudicial recovery and bankruptcy made by the Company itself is relevant, from the moment studies or analyses relating to such request are initiated.
- 2.3.2.1 The presumptions contained in item 2.3.2 are relative and must be analyzed together with other elements that indicate whether or not the unlawful act was actually committed, and may, if applicable, be used interpretively in a combined manner.
- 2.3.2.2 In compliance with the provisions of applicable regulations, the presumptions do not apply:
 - a) to cases of acquisition, through private negotiation, of treasury shares, arising from the exercise of a call
 option in accordance with a plan for granting a stock option approved at a general meeting, or when it is
 the granting of shares to Directors, employees or service providers as part of remuneration previously
 approved at a general meeting; and
 - b) to trades involving fixed income securities, when carried out through transactions with combined repurchase commitments by the seller and resale by the buyer, for settlement on a pre-established date, prior to or equal to the maturity of the securities subject to the transaction, carried out with profitability or pre-defined compensation parameters.
- 2.3.3 The prohibition on the use of Inside Information does not apply to subscriptions for new Securities, without prejudice to the incidence of the rules that provide for disclosure of information in the context of the issuance and offer of these Securities.

2.4. PROHIBITED PERIOD

- 2.4.1 During the 15 (fifteen) day periods prior to the disclosure of Copel's Quarterly Information (ITRs, *Informações TRimestrais*) and Financial Statements (DFs, *Demonstrações Financeiras*), trading in Securities by all persons bound by this policy is prohibited.
- 2.4.1.1 The prohibition provided for in this item does not depend on (i) knowledge, by such persons, of the content of the Company ITR or DFs; (ii) the assessment regarding the existence of Material Information pending disclosure; or (iii) analysis regarding the intention of the negotiation.
- 2.4.1.2 The prohibition provided for in this item does not apply to:
 - a) trades involving fixed income securities, when carried out through transactions with combined repurchase commitments by the seller and resale by the buyer, for settlement on a pre-established date, prior to or equal to the maturity of the securities subject to the transaction, carried out with profitability or pre-defined compensation parameters;



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- transactions intended to fulfill obligations assumed prior to the start of the blackout period arising from Securities loans, exercise of put or call options by third parties and forward sale and purchase agreements; and
- negotiations carried out by financial institutions and legal entities that are part of its economic group, provided that they are carried out in the normal course of its business and within the parameters set forth in this Policy.

2.5. BLOCKING PERIODS

- 2.5.1 The VPFI may, regardless of the existence of Material Information not yet disclosed, set periods in which Related Persons may not trade Securities by sending a notification in which it expressly indicates the start and end of the Blocking Period, which will last until a new notification is sent expressly stating its end.
- 2.5.2 The notification of the Blocking Period sent by the VPFI does not necessarily need to be justified or inform the facts that give rise to the determination of the VPFI, and may also have as recipients all or only part of the Related Persons.
- 2.5.3 The recipients of the Blocking Periods must refrain from trading in the Securities throughout this Period and maintain confidentiality regarding notifications relating to Blocking Periods.
- 2.5.4 The absence of communication by the VPFI on Blocking Periods does not exempt Related Persons from compliance with the terms of this Policy and applicable standards.

2.6. EXPECTED CONDUCT FOR TRADING BY RELATED PERSONS

- 2.6.1 Related Persons must fully observe the Policy and other rules applicable to the trading of Securities.
- 2.6.2 Related Persons must immediately report any violations of this Policy that are known to them to the Copel VPFI.
- 2.6.3 As long as they are outside the Prohibited Periods and Blocking Periods, and they do not have Inside Information, Related Persons may freely trade Securities.

2.7. DISCLOSURE OF INFORMATION ON OWNERSHIP AND TRADING OF SECURITIES

- 2.7.1 The Directors, members of the Audit Committee and statutory bodies with technical or consultative functions must inform the VPFI of the ownership and the trading carried out with Securities issued by Copel, by its parent companies or controlled public companies.
- 2.7.1.1 The communication referred to in item 2.7.1 above must also include, in the form of CVM Resolution 44, the ownership and trading with the Securities that are owned by persons linked to the Related Persons.

The communication referred to in item 2.7.1 must contain, at a minimum, the following information:

- a) name and qualification of the reporting party, indicating the registration number in the National Register of Legal Entities or in the Register of Individual Taxpayers;
- b) quantity, by type and class, in the case of shares, and other characteristics in the case of other securities, in addition to the balance of the position held before and after the negotiation; and
- c) form of acquisition or disposal, price and date of transactions.
- 2.7.1.2 The communication referred to in item 2.7.1 must be carried out: (i) within 5 (five) days after the execution of each item of business; and (ii) on the first business day after the investment in the position.
- 2.7.2 Copel, through the VPFI, must disclose monthly, in the form of applicable regulations, the information referred to in item 2.7.1 and the information regarding the Securities traded by itself, its subsidiaries and affiliates.



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2.8. DISCLOSURE ABOUT RELEVANT TRADING

- 2.8.1 Shareholders who elect members of the Board of Directors or the Audit Committee, as well as any natural or legal person, or group of persons, representing the same interest, who carry out Relevant Trading, business or set of businesses through which the direct or indirect participation of the persons referred to in the caput 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 shares representing the share capital of a publicly-held company, must send to the VPFI an immediate communication containing, at least, the following information.
 - a) name and qualification, indicating the registration number in the National Register of Legal Entities (CNPJ, Cadastro Nacional de Pessoas Jurídicas) or in the Individual Register of Taxpayers CPF, Cadastro de Pessoas Físicas);
 - b) objective of the participation and target quantity, containing, if applicable, a statement that the business does not aim to change the composition of the control or the administrative structure of the Company;
 - c) number of shares and other securities and derivative financial instruments referenced in such shares, whether of physical or financial liquidation, explaining the quantity, class and type of shares referenced;
 - d) indication of any agreement or contract regulating the exercise of the right to vote or the purchase and sale of securities issued by the Company; and
 - e) if the shareholder is a resident or domiciled abroad, the name or corporate name and the registration number in the Individual Taxpayers Register or in the National Register of Legal Entities of its proxy or legal representative in the Country for the purposes of Art. 119 of the Corporate Law.
- 2.8.2 The VPFI is responsible for transmitting to the market, as soon as the information on the Relevant Trading is received, in the form of applicable regulations.

3. PENALTIES

Failure to comply with the obligations and requirements set forth in this Policy may subject the Related Persons, as applicable, to liability in the civil, criminal or administrative spheres, without prejudice to the sanctions and disciplinary measures set forth in the Copel Code of Conduct, NAC 40301 - Functional Discipline and other internal standards.

4. FINAL PROVISIONS

- 4.1 Any doubts about the provisions of this Policy, the applicable regulations issued by the CVM and/or about the possibility of conducting a certain trade, about the relevance of a certain act or fact, and about disclosure and about Material or Insider Information, should be clarified with the VPFI via email: ri@copel.com.
- 4.2 This Policy must be governed by and interpreted, including in omitted cases, in accordance with applicable standards, especially those set forth in item 5.
- 4.3 In case a conflict between the provisions of this Policy and current standards, the provisions of current standards shall prevail. In case of conflict between the provisions of this Policy and the Copel Bylaws, the provisions of the Copel Bylaws shall prevail.
- 4.4 Should any provision of this Policy be held invalid, illegal or ineffective, that provision shall be limited to the extent possible so that the validity, legality and effectiveness of the remaining provisions of this Policy are not affected or impaired.
- 4.5 This Policy is effective on the date of its approval by Copel's Board of Directors and is disclosed in accordance with applicable regulations.



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5. SPECIFIC LEGISLATION RELATED TO THE SUBJECT

The laws and regulations that directly affect this Policy are organized in the Applicable Corporate Policy Legislation and Regulation Book, which can be accessed on the Investor Relations website (ri.copel.com) and on the Copel Sustainability Portal.

It updates NPC 0102 dated 02/16/2022, and updates and incorporates the content of NPC 0103 Information Disclosure and Preservation of Confidentiality Policy.

This Policy was approved at the xxxth Ordinary Meeting of the Board of Directors (ROCAD, *Reunião Ordinária do Conselho de Administração*), dated 04.16.2025.



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ANNEX I

TERMS OF ADHESION

SECURITIES TRADING AND MATERIAL ACT OR FACT INFORMATION DISCLOSURE POLICY

By means of this instrument, [name], [qualification], resident and domiciled(s) at [address], enrolled(s) in CPF/ME under number [#], bearer of identity card no. [insert number and issuing body], as [indicate the position, function or job title], I hereby declare, I became aware of the Securities Trading and Material Act or Fact Information Disclosure Policy, available at ri.copel.com, approved by the Board of Directors of Companhia Paranaense de Energia – COPEL, at its [.] meeting on [.] 2024, forwarded to the CVM, pursuant to CVM Resolution No. 44/2021, and, I express full awareness and agreement with the terms of this Policy, forcing me to comply unconditionally and unrestrictedly, as well as, to contribute to the relevant linked/connected people, as defined, also fully comply with them.

For the purposes of Art. 11 of CVM Resolution 44, I further declare that I, in my capacity as a relevant linked person, and the persons linked to me, pursuant to this policy:

For the purposes persons linked to r		M Resolution 44, I furt this policy:	her declare that I	, in my capacity a	is a relevant linked	person, and the
\square We do not hold	, on this date, se	ecurities issued by Cor	mpanhia Paranae	nse de Energia –	Copel; or	
☐ On this date, we below.	e have the follow	wing securities issued	by Companhia Pa	aranaense de Ene	ergia – Copel, presei	nted in the table
Securities	Type/Class	Name of the Related / Affiliated Person	CPF/CNPJ	Qualification	Classification of Affiliated Person (if applicable)	Quantity
		whom they are not judicia statement; and d) compa				pendent included
City and date	,,	of	of			
Signature						