

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY

CORPORATE GOVERNANCE

Version 11 of October 15, 2025

1/11

1. INTRODUCTION

The integration of corporate risk management practices within the Company contributes to decision-making on governance, strategy, goal setting, and operations, enabling continuous improvement of results by connecting strategy and business objectives with the risk to which the Company is subject. Corporate risk management provides COPEL with greater insight into its strengths and opportunities, helping to create, preserve, and realize value.

It is of utmost importance that Copel adopts the Three Lines Model, developed and published by IIA Global, The Institute of Internal Auditors, as it provides guidance on identifying structures and processes that best assist in achieving objectives and facilitate strong governance and risk management.

1.1 SCOPE

The scope of this Policy defines Copel's guidelines for corporate risk management, as well as decisions involving this topic, in order to identify, evaluate, address, and monitor risks inherent to Copel and its sector of operation that may affect the fulfillment of its objectives and the conduct of its business.

1.2 CONCEPTS

The terms used in this Policy are defined and organized in the Glossary of Concepts which can be accessed on the Copel Sustainability Portal or on the Investor Relations website.

1.3 PURPOSE

Establish guidelines that contribute to ensuring that corporate risk management at Companhia Paranaense de Energia - Copel (Holding), its wholly-owned subsidiaries (direct and indirect) and controlled companies (direct and indirect), in accordance with its corporate procedures, is aligned with the best interests of the Company and is based on the principles of independence, competitiveness, compliance, transparency, equity, and commutativity.

For the purposes of this Policy, the group of companies listed in the previous paragraph will henceforth be referred to as Copel.

It is also applicable, as a recommendation, to jointly controlled companies, affiliated companies, and other corporate interests, in accordance with their corporate procedures.

Additionally, where applicable, the guidelines of this Policy are also applicable, as a recommendation, to Copel's suppliers.

1.4 PRINCIPLES

The policy seeks to ensure an appropriate and diligent decision-making process by Copel's management, based on the following principles:

1.4.1 - Corporate Risk Management is directly related to sustainable growth, the Company's profitability and the

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY

CORPORATE GOVERNANCE

Version 11 of October 15, 2025

2/11

creation of value for its shareholders, given that this process enables the identification of threats and business opportunities, in addition to taking risk-based decisions.

1.4.2 - The guidelines of this policy are based on Copel's values, its Code of Conduct and the guidelines issued by COSO (Committee of Sponsoring Organizations of the Treadway Commission) in its document titled "Enterprise Risk Management Integrated with Strategy and Performance", from 2017.

1.4.3 - PROTECTION AND GENERATION OF VALUE FOR COPEL

Copel is committed to promoting the values of ethics, integrity and transparency in its business, with zero tolerance for fraud and corruption, cultivating credibility among its stakeholders, and encouraging continuous actions to comply with applicable laws and initiatives combating fraud and corruption.

1.4.4 - Risk management is directly related to Copel's sustainable growth, identifying threats and opportunities, and providing information for risk-based decision-making, which must comply with laws, regulatory rules and the Company's internal policies.

1.4.5 - INTEGRATION OF RISK MANAGEMENT WITH THE DEFINITION OF STRATEGIES AND PERFORMANCE MONITORING

Risk management should support management during the strategy definition and performance monitoring process. Risk management should support Management during the process of defining strategies and monitoring performance in order to ensure the alignment of Corporate Risk Management with strategic objectives and business objectives, so as to support Management in preserving capital and consequently generating value.

1.4.6 - FORMAL ESTABLISHMENT OF ROLES AND RESPONSIBILITIES

Each role during the risk management process must be formally defined and assigned, with responsibilities described, disclosed and clearly understood by everyone involved.

The Company must act preventively to avoid exposure to the risks of fraud, acts of corruption or any form of misconduct.

1.4.7 - CONSTITUTION AND MAINTENANCE OF ADEQUATE INFRASTRUCTURE

The Company is committed to implementing and maintaining an effective and consistent corporate risk management structure, providing adequate resources for its performance.

The organizational structure has an Executive Board responsible for Governance, Risk and Compliance that works alongside the Executive Boards, supporting the development of effective processes and controls and exercising the responsibilities inherent to the second line.

1.4.8 - DEFINITION OF COMMON METHODOLOGY FOR THE WHOLE COMPANY

Corporate risk management must provide guidance, integrated action, standardization and economies of scale for control and compliance actions that are recognized for protecting or generating business value at Copel, with secure and timely consolidated reports to stakeholders.

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY**CORPORATE GOVERNANCE****Version 11 of October 15, 2025**

3/11

Compliance actions must promote universal awareness among all employees of the importance of ethical behavior, the need to identify potential risks, and the determination to act whenever necessary.

1.4.9 - RISK APPETITE STATEMENT

Copel adopts the following guidelines for establishing acceptable limits for the Company's exposure in relation to its risk appetite:

- a) acting according to the highest ethical and compliance standards;
- b) ensuring that activities or practices adopted are aligned with ESG practices with an emphasis on climate change and socio-environmental aspects;
- c) ensuring that occupational safety is strictly observed in all Copel operations;
- d) ensuring the constant improvement of the level of cyber security of Information Technology and Operation Technology; and
- e) investing in businesses that adhere to the Investment Policy and Strategic Planning, based on the fundamentals and pillars of decarbonization, integration with scale, capital discipline, and innovation.

1.5 - PREMISES

1.5.1 - Maintaining the risk management policy aligned with Copel's business strategy and objectives.

1.5.2 - Maintaining effectiveness and compliance in the internal control environment.

1.5.3 - Ensuring monitoring of corruption and fraud risks in the internal control environment.

1.5.4 - Integrating the risk management process into commercial relationships with suppliers and business partners.

1.5.5 - Ensuring that severe risks with a very low probability of occurrence are also considered when formulating strategies.

1.5.6 - Considering aspects related to sustainability, emphasizing socio-environmental and health and safety issues, seeking to anticipate, evaluate and reduce operations' short, medium and long-term impacts on society.

1.5.7 - Adopting practices for reporting incidents and control integrated with Corporate Risk Management.

1.5.8 - Adopting risk appetite criteria in the analysis of corporate risks, which are periodically submitted for assessment by the Board of Directors.

1.5.9 - Directing identified opportunities to the competent departments to analyze and implement the actions necessary for their realization.

1.5.10 - Promoting risk management culture, preparing and disseminating information on risks, culture and

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY**CORPORATE GOVERNANCE****Version 11 of October 15, 2025**

4/11

performance covering all levels and the company as a whole, especially in controlled, jointly controlled and affiliated companies.

1.5.11 - Developing a consolidated portfolio view of corporate risks that improves the organization's ability to articulate the level of risk assumed in pursuing strategy and business objectives.

1.5.12 - Supporting administration policies, defining roles and responsibilities and defining implementation goals.

1.5.13 - Providing guidance and training on corporate risk management processes.

1.5.14 - Identifying new and emerging risks so that the CAE can assess and monitor risk exposure and management can implement responses promptly.

1.5.15 - Assisting management in developing processes, risk responses, and defining risk tolerance to manage risks and issues.

1.5.16 - Monitoring the adequacy and effectiveness of risk responses, the accuracy and integrity of disclosures and the timely correction of deficiencies.

1.5.17 - Escalating exposures to identified or emerging risks to the BoD for their awareness and potential action.

1.5.18 - Maximizing the use of the company's existing information systems and technologies to boost corporate risk management.

1.5.19 - Submitting the effectiveness of the risk management process to evaluation by the CAE and monitoring by the BoD.

1.5.20 - Submitting the risk portfolio and resulting mitigation plans for analysis by the CAE quarterly and every six months to the BoD.

1.5.21 - The CDS will analyze the risk portfolio in terms of sustainability and climate change, as well as mitigation plans.

1.6 - STEPS FOR CORPORATE RISK ASSESSMENT**1.6.1 - IDENTIFY RISKS AND ASSESS THE CONTROL ENVIRONMENT**

This involves identifying the set of events, whether external or internal, that may impact the Company's strategic objectives by understanding the control environment related to each risk and verifying the existing mitigating actions to reduce its exposure.

To support risk management activity, the company adopts the SAP GRC (Governance, Risk and Compliance) PC (Process Control) system, which has features for continuous monitoring of impacts on the company's business processes. The Risk and Control Matrix, built based on identifying and defining the profile of risks linked to business processes, is registered in the system, providing monitoring of identified risks.

1.6.2 - CLASSIFY CORPORATE RISKS

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY**CORPORATE GOVERNANCE****Version 11 of October 15, 2025**

5/11

Corporate risks can be classified according to the categories below:

1.6.2.1 - STRATEGIC RISKS

a) Strategy - risks associated with senior management decision-making and strategic planning, which could result in a substantial loss in Copel's economic value.

b) Reputation - possibility of losses resulting from the deterioration of Copel's brand before the market, customers and regulatory bodies due to negative publicity.

1.6.2.2 - FINANCIAL RISK

a) Market - risk that the fair value or future cash flows of a financial instrument will fluctuate due to changes in market prices, such as exchange rates, interest rates, and stock prices.

b) Liquidity - represented by the possibility of insufficient resources, cash or other financial assets to settle obligations on the scheduled dates.

c) Credit - the risk of incurring losses arising from the difficulty in receiving amounts invoiced to its customers or from a counterparty in a financial instrument, resulting from their failure to comply with their contractual obligations.

d) Disclosure - risk associated with the possibility of issuing incomplete, inaccurate or untimely financial, management, regulatory, tax, and statutory reports, exposing Copel to fines, penalties or other sanctions.

1.6.2.3 - OPERATIONAL RISK

a) Processes - risk related to the effectiveness and efficiency of Copel's operations, including financial and operational performance goals and the safeguarding of assets against loss, and the possibility of losses resulting from failure, deficiency, or inadequacy of internal processes, people, and systems, or from external events.

b) Information Technology and Operation Technology - risks of unauthorized access to the Company's data and information, resulting from vulnerabilities in access controls, failure to segregate functions, violation of policies, leading to external attacks, downtime in the IT and OT environment, alteration or improper disclosure of information.

c) Socio-environmental - risks related to the impacts of Copel's operations on society, the environment, and health crises, which may generate regulatory and financial liabilities and affect the Company's image and reputation. This risk is also related to the impacts of the environment, both with regard to physical issues, biodiversity and society, on Copel's operations.

d) Climate - risks related to current and future climate changes on the Company's operations, such as the effects of severe weather, dam ruptures, and scarcity of natural resources, among others, which may affect:

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY**CORPORATE GOVERNANCE****Version 11 of October 15, 2025**

6/11

- Physical climate risks - the possibility of losses caused by events associated with frequent and severe weather (acute) or long-term environmental changes (chronic), which may be related to changes in climate patterns;
- Transition climate risks - the possibility of losses caused by events associated with the transition process to a low-carbon economy, in which the emission of greenhouse gases is reduced or offset, and the natural mechanisms for capturing these gases are preserved.

e) Projects - risks related to transmission, generation, distribution, telecommunications, research and development projects, among others, which may result in additional costs, delay in project delivery and fines by regulatory bodies.

1.6.2.4 - COMPLIANCE RISK

a) Laws and standards - non-compliance with environmental, labor, tax and regulatory laws to which Copel is subject, including internal policies and standards, exposing the Company to fines by regulatory bodies.

b) Fraud and corruption - risks related to the theft of physical assets, information agency, misappropriation of funds, conflict of interests, influence peddling, soliciting and accepting bribes, kickbacks, collusion with suppliers and customers, among others, which may result in financial losses, fines, sanctions and penalties imposed by regulatory agencies, and damage to Copel's image;

c) LGPD - risks within the scope of the Brazilian General Data Protection Law related to any Company activity that requires data processing and/or uses personal data in its operation, such as: collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction of data.

1.6.3 - ASSESS RISKS REGARDING THEIR IMPACT AND PROBABILITY

To optimize resources and efforts, the risks to be managed must be prioritized according to their relevance to the Company, resulting from assessing impact and probability according to pre-established and validated criteria.

1.6.3.1 - Assessment of the probability of risk materialization based on its history and control environment:

- Probability is the chance of the risk event occurring within the expected timeframe to achieve the objective/result.

1.6.3.2 - Assessment of the impact that a materialization of the risk could cause:

- The impact is the potential capacity of the risk event to reduce the possibility of achieving the business's strategic objectives of the business.

1.6.3.3 - Assess corporate risks based on the heat map:

- The purpose of this step is to assist in decision-making based on the results of the risk assessment

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY

CORPORATE GOVERNANCE

Version 11 of October 15, 2025

regarding which risks need to be addressed and prioritized for the implementation of corrective and/or mitigating actions to reduce the probability of materialization. The corporate risk map will provide visibility of the positioning of risks according to the combination of impact and probability classification based on the Company's criteria and risk appetite level. Depending on the context and specificity of the object under assessment, a 5x5 matrix or a 3x3 matrix may be used:

HEATMAP



NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY
CORPORATE GOVERNANCE
Version 11 of October 15, 2025

HEATMAP



1.6.4 - TREATING RISKS

It involves planning and taking action to change the level of risk. The level of risk can be changed through risk response measures that mitigate, transfer, or avoid these risks.

1.6.5 - MONITORING IDENTIFIED RISKS AND ACTION PLANS

The Corporate Risk Assessment must be carried out periodically, with the aim of updating and completing data. In addition, the action plans defined to improve the control environment should be monitored, considering the implementation deadline for improvement opportunities agreed upon with each area, in order to update the data and monitor the associated risks.

1.6.6 - KRI (KEY RISK INDICATORS) MONITORING

Monitoring through Key Risk Indicators should be used to identify the need to implement improvement actions to reduce risk exposure and should be carried out periodically with the business areas, identifying the need for corrective and mitigating actions in a timely manner.

1.6.7. RESPONSIBILITIES

To coordinate the roles of the actors involved in Risk Management, Copel adopts the corporate risk model based on the 3 Lines Model as proposed by The Institute of Internal Auditors (IIA) as follows:

Governance, Risk and Compliance Directorate (Diretoria de Governança, Risco e Compliance - DRC)
Governance and Secretariat Superintendence (Superintendência de Governança e Secretaria - SGV)

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY**CORPORATE GOVERNANCE****Version 11 of October 15, 2025**

9/11

ADMINISTRATIVE BODY - Executive Boards. Responsible for accountability to stakeholders regarding organizational oversight through integrity, leadership and transparency.

MANAGEMENT - responsible for actions (including risk management) to achieve the organization's objectives through risk-based decision-making and the application of resources.

a) 1st line of defense: execution of internal controls by all those responsible for carrying out activities and tasks within the scope of the final and support macro processes of COPEL's departments and business entities. The first line comprises: Executive Directors, Superintendents, and Managers of business areas, as well as Project and Process Managers. They are responsible for providing services and products to customers and for managing risks.

b) 2nd line of defense: supervision and monitoring of risks and internal controls performed by specific bodies and as a core activity, such as committees, management teams, or specific advisory bodies to address risks, internal controls, integrity, and compliance. The second line comprises: Board of Directors responsible for Governance, Risk, and Compliance. Responsible for supporting, monitoring, and questioning issues related to risks.

c) 3rd line of defense: constituted by internal audits within the scope of COPEL's processes and departments, as they are responsible for assessing the implementation of internal management controls (first line or layer of defense) and supervising internal controls (second line or layer of defense). The third line comprises: (Internal Audit - AUD). It carries out an independent assessment.

This policy defines the following entities and related responsibilities as bodies involved in COPEL's Risk Management function:

1.6.7.1 - BOARD OF DIRECTORS - BoD

- a) approves the Corporate Risk Management Policy;
- b) evaluates and approves the alignment of risk appetite with strategic management processes;
- c) monitors the effectiveness of the risk management process at Copel;
- d) analyze the risk portfolio and resulting mitigation plans on a semi-annual basis; and
- e) implements and supervises the risk management and internal control systems established to prevent and mitigate the main risks to which the Company is exposed, including risks related to the integrity of accounting and financial information and those related to the occurrence of corruption and fraud.

1.6.7.2 - STATUTORY AUDIT COMMITTEE - CAE

- a) evaluates the effectiveness of the risk management process at Copel;
- b) reviews the Corporate Risk Management Policy every two years; and
- c) analyzes the risk portfolio and resulting mitigation plans quarterly.

This policy does not supersede the powers of the Statutory Audit Committee established in its Internal Regulations.

1.6.7.3 - EXECUTIVE BOARDS (first line)

Governance, Risk and Compliance Directorate (Diretoria de Governança, Risco e Compliance - DRC)
Governance and Secretariat Superintendence (Superintendência de Governança e Secretaria - SGV)

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY**CORPORATE GOVERNANCE****Version 11 of October 15, 2025**

10/11

- a) sponsor the implementation of risk management within the scope of its activities;
- b) support risk managers in establishing treatment actions and control mechanisms for identified risks and incidents; and
- c) support the Executive Board responsible for Governance, Risk and Compliance in preparing the corporate risk portfolio.

1.6.7.4 - RISK MANAGER (first line)

- a) identifies the risks, their causes and their impacts on Copel;
- b) establishes appropriate actions and control mechanisms for each risk;
- c) periodically monitors the risks under their responsibility; and
- d) reports high and critical risks to the Executive Board of the department involved and to the Executive Board responsible for Governance, Risk and Compliance for analysis and assessment, following the Risk Management Methodology and defined standards and incidents of risk materialization.

1.6.7.5 - EXECUTIVE BOARD RESPONSIBLE FOR GOVERNANCE, RISK AND COMPLIANCE (second line)

- a) defines and coordinates the implementation of guidelines, policies, methodologies, risk management practices and the internal control environment at Copel;
- b) Structures the internal control system in a manner compatible with Copel's activities to mitigate possible conflicts in the conduct of its business;
- c) reports the results obtained in the assessment of the internal control environment to the process owners, the Executive Board and the Statutory Audit Committee;
- d) supports managers and employees in preparing action plans necessary to implement the appropriate internal control environment and mitigate risks;
- e) raise awareness among managers about the importance of integrated risk management and their responsibilities in maintaining and preserving the internal control environment;
- f) arranges training and monitors the application of risk identification, severity assessment, risk prioritization and implementation of risk responses;
- g) disseminates and monitors the appropriate application of policies and methodologies;
- h) prepares, monitors and manages Copel's corporate risk portfolio;
- i) monitor treatment actions and control mechanisms for identified risks;
- j) presents the Corporate Risk Portfolio to the Supervisory Board, CAE and BoD periodically;
- k) periodically reports risk management activities to the CAE and BoD; and
- l) promotes and encourages awareness of risks throughout the Company.

1.6.7.6 - INTERNAL AUDIT (third line)

- a) evaluate the effectiveness of the risk management, control, and governance process at Copel;
- b) evaluate the adequacy of treatment actions and internal control mechanisms, recommending, when necessary, improvements in processes to the risk manager; and
- c) submit periodic reports on its evaluations to the BoD and CAE.

1.6.8 - FINAL TOPICS AND PROVISIONS

Governance, Risk and Compliance Directorate (Diretoria de Governança, Risco e Compliance - DRC)
Governance and Secretariat Superintendence (Superintendência de Governança e Secretaria - SGV)

NPC 0104 INTEGRATED CORPORATE RISK MANAGEMENT POLICY**CORPORATE GOVERNANCE****Version 11 of October 15, 2025**

11/11

1.6.8.1 - All other risk management documents must comply with this Policy.

1.6.8.2 - The information contained in this Policy may be disclosed externally with Copel's authorization.

1.6.8.3 - This Policy shall be reviewed and approved every two years, with the review being the responsibility of the Corporate Integrity Superintendence (SIN) and approval being the responsibility of the BoD. The Policy is published on Copel's website at www.copel.com.

2. SPECIFIC LEGISLATION RELATED TO THE SUBJECT

The Legislation and regulations applicable to Corporate Policies are organized in a specific notebook, available for consultation on the Copel Sustainability Portal, on the Investor Relations page and on the Company's website.

Updates NPC 0104 of 12/12/2023.

NPC 0104 approved by the 267th Ordinary Meeting of the Board of Directors - ROCAD, on October 15, 2025.