

 eneva	Template Política and Supplier Relations Policy	Code:	PL.CRP.SUP.001
		PDCA:	327/2025
	Procurement	Review:	01
		Date:	12/11/2025

REVIEW AND APPROVAL

Review	Date	Description of Updates
00	02/11/2021	Document creation.
01	12/11/2025	<ul style="list-style-type: none"> ▪ Changing the title of the regulation from "Purchasing Policy" to "Procurement and Supplier Relations Policy". ▪ Updating the document template; ▪ Reviewing and updating the Purpose, ensuring alignment with corporate guidelines; ▪ General review of the content, including updating the principles and adapting the file; ▪ Inclusion of the principles of Procurement Governance, Supplier Selection and Management, Category Management, and Materials Management; ▪ Updating the General Provisions section.

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1. PURPOSE

This Policy aims to establish the principles and guidelines that guide ENEVA's ("Company") actions in managing the Supply Chain, promoting an ethical, transparent and sustainable relationship with suppliers and other strategic partners, as well as ensuring that all procurement decisions are aligned with the corporate strategy, so as to contribute to the Company's competitiveness, sustainability and reputation.

2. APPLICATION

This document applies to all areas that comprise ENEVA's organizational structure, including SPE's, joint ventures and associated companies in which control is held by ENEVA. In other cases, the content of this document shall be brought to the knowledge of its business partner(s) for analysis of the pertinence of full or partial implementation.

3. REFERENCES

- **PL.CRP.CMP.002** - Eneva Code of Conduct
- **PL.CRP.CMP.007** – Code of Conduct for Third Parties
- **PL.CRP.CMP.003** - Anti-Corruption Policy
- **PL.CRP.CMP.004** - Human Rights Policy
- **PL.CRP.CMP.005** – Antitrust Policy
- **PL.CRP.FIN.001** – Financial Policy
- **PL.CRP.GOV.001** – Policy for Transactions with Related Parties
- **PL.CRP.GOV.003** – Authority Level Policy
- **PL.CRP.ESG.001** Sustainability Policy

4. DEFINITIONS

- **Approval Levels** - Limitation of decision-making authority across the Company's hierarchical levels, under different circumstances.
- **Acquisition of Goods and Services** – a process that includes the purchase of materials, equipment, and the contracting of services to meet Eneva's needs.

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- **Delegated Area** - another business area of the Company authorized by Procurement to conduct procurement processes, within a previously specified scope and/or value, and in compliance with the Company's processes and regulations.
- **Requesting Area** - Areas responsible for formalizing and approving requests for the acquisition of goods and services of any kind.
- **Total Acquisition Cost** - A model that reflects the sum of all costs involved in purchasing a good or service, including, but not limited to, price, logistics, applicable taxes, risk mitigation, and contract management.
- **Due diligence** - The process involves assessing reputation, history of ethical conduct, legal standing, and other applicable requirements necessary to measure the risk associated with third parties who are related in any way to or represent Eneva, customers, and potential business partners.
- **ESG** – Environmental, Social and Governance
- **Stakeholders** – For the purposes of this Policy, individuals involved in the process of acquiring goods and services.
- **Procurement** – an area reporting to the Corporate Services Executive Officer and defined as responsible for managing the supply chain for the entire Eneva organization.

5. PRINCIPLES AND GUIDELINES

Supply chain management decisions and processes shall be guided by the following principles and guidelines, in alignment with strategic goals and the institutional commitment to ethics, transparency, and sustainability:

- **Transparency and Integrity:** Ensure clear, auditable processes free from conflicts of interest, strengthening stakeholder trust and the Company's reputation.
- **Governance and Compliance:** Act in strict compliance with laws, regulations and internal policies, ensuring ethics, integrity and accountability at all stages of the supply process.
- **Sustainability and Social Responsibility:** Prioritize suppliers that adopt ESG practices, contributing to sustainable development and long-term value creation.

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- **Innovation and Value:** Foster partnerships that promote innovation, operational efficiency, and competitiveness.
- **Integrated Planning:** Ensure alignment between requesting areas and Procurement, promoting predictability, efficiency, and synergy in operations.
- **Segmentation and Contracting Models:** Classify procurement goals and suppliers based on criticality, risk, and strategic impact, defining procurement models appropriate to the supply profile.
- **Risk Management:** Map and monitor operational, financial, reputational, and compliance risks on a continuous basis, with mitigation and control mechanisms in place.

5.1. Governance in Acquisitions

Governance in Acquisitions aims to ensure that the processes for acquiring goods and services are conducted in line with Eneva's corporate strategy. To achieve this, the following guidelines shall be considered:

- **Responsibility and Scope:** The Procurement area is responsible for establishing the procurement processes and regulations to comply with this Policy, conducting the acquisition of goods and services, and/or defining the scopes that can be conducted by Delegated Areas, according to previously established criteria.
- **Regulatory Compliance:** The person responsible for acquisitions, including Delegated Areas, shall ensure adherence to Eneva's internal regulations, encompassing policies, guidelines, and approval levels.
- **Traceability and Transparency:** All procurement processes shall be clearly and auditably documented, ensuring traceability of the decisions and steps involved.
- **Approval Levels:** Acquisitions shall comply with the approval limits defined in the Authority Levels Policy, and the fragmentation of requests and/or amounts aimed at circumventing the established levels is expressly prohibited.

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- **The Role of Managers:** Managers shall ensure compliance with this Policy and promote decisions aligned with corporate guidelines in their areas.
- **Auditing and Monitoring:** Compliance with this Policy will be periodically assessed through internal and external audits, aiming for continuous improvement and risk mitigation.

5.2. Supplier Selection

Supplier selection shall ensure the choice of the best alternatives for each procurement need. To achieve this, the following guidelines shall be considered:

- **Scope Adherence:** Select suppliers that fully meet the technical, operational, safety, integrity, and social and environmental requirements defined for each procurement process.
- **Commercial and Logistical Conditions:** Prioritize suppliers that offer the best commercial terms, compatible delivery/mobilization times, and proven service capacity, resulting in the lowest total cost of acquisition.
- **Isonomy and Equity:** Ensure that all participating suppliers receive equivalent opportunities and information and are assessed based on objective and equitable criteria, previously defined and documented.
- **Formalization of Process** Ensure that all stages of the selection process are properly formalized, including proposal records, assessment criteria, justifications for selection, and contractual documentation.
- **Local Suppliers:** Whenever possible, consider using locally operating suppliers in the procurement of goods and services, seeking to develop new partnerships and expand Eneva's operational areas.
- **Compliance and Integrity:** Perform Due diligence for suppliers to ensure their compliance with current legislation and Eneva's internal regulations, especially the Code of Conduct for Third Parties and Anti-Corruption Policy, and assess their ESG and integrity practices and their presence on national and international restricted lists.

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5.3. Supplier and Categories Management

Supplier and category management shall be conducted in a structured manner, aiming to strengthen the resilience of the supply chain, ensure operational excellence, and generate sustainable value for the Company. To achieve this, the following guidelines shall be considered:

- **Strategic Segmentation of Supply:** Classify ENEVA's expenses into categories according to criticality, risk, and business impact allows for differentiated approaches and prioritization of strategic partnerships.
- **Compliance Monitoring:** Monitor suppliers periodically to ensure their continued compliance with current legislation, Eneva's regulations, and ESG and integrity practices.
- **Contract Management:** Conduct contract management in a structured manner, encompassing all phases of the cycle: drafting, execution, monitoring of obligations, renewals, and termination. Implement mechanisms for monitoring validity, payments, compliance with clauses, and performance indicators, ensuring legal security and risk mitigation.
- **Performance Assessment:** Define specific indicators to monitor the performance, quality, innovation, and compliance of suppliers with scopes that are critical and/or relevant to ENEVA, with regular cycles of assessment, feedback, and joint development. The evolution of these indicators will serve as input for future decisions regarding ENEVA's relationship with its suppliers.
- **Risk Management:** Map and monitor risks in supply categories, establishing contingency plans to ensure business continuity in critical scenarios.
- **Development of Suppliers:** Promote capacity building, training, and continuous improvement initiatives to raise the standard of suppliers, especially local and regional ones, strengthening the supply chain.
- **Integrated and Transparent Communication:** Communication with suppliers will be agile, transparent, and documented. guided by mutual respect between the parties.

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5.4. Management of Materials

Efficient materials management is key to ensure operational continuity, strengthen competitiveness, and contribute to ENEVA's results, considering the following guidelines:

- **Item Registration and Integration:** Ensure the accurate and up-to-date registration of all items in Eneva's internal corporate system, promoting integration between areas and full visibility of the supply chain.
- **Consumption and Inventory Monitoring:** Continuously monitor material consumption and inventory parameters, using analytical tools to forecast demand, prevent stockouts, and optimize inventory levels.
- **Delivery and Logistics Management:** Efficiently manage the delivery of materials and equipment, ensuring compliance with terms, traceability of logistics operations, and compliance with safety and quality requirements.
- **Physical Receiving and Inventory Control:** Implement structured processes for the physical receipt of items and inventory management, ensuring accuracy, loss control, and meeting the Company's operational needs.

6. GENERAL PROVISIONS

Compliance with this Policy is mandatory for all employees and third parties involved in the Company's activities. The area responsible for the Policy shall promote periodic reviews and propose updates, ensuring adherence to best market practices, applicable legislation, and internal regulations.

The Board of Directors is responsible for approving the proposed reviews and changes.

Failure to comply with the provisions set forth herein may have significant impacts on the Company and shall be reported to the Compliance area, and shall be subject to the measures provided for in the Consequences Management Guideline. Furthermore, non-compliance may result in civil, administrative, and, where applicable, criminal liability, in accordance with current legislation.

This Policy becomes effective on the date of its approval by the Board of Directors.