

	Human Rights Policy	Code:	PL.CRP.CMP.003
		PDCA:	293
	Compliance	Review:	01
		Date:	28/03/2025

REVIEW AND APPROVAL

This Policy was approved at a meeting of ENEVA's Board of Directors held on 03/20/2025, and any changes or revisions must be submitted to it.

Review	Date	Description of Updates
00	02/11/2021	Document creation...
01	03/20/2025	Revision of the document to update the company's guidelines and commitments in relation to human rights.

Elaboration	Review	Approval
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1 OBJECTIVE

The Human Rights Policy is a document that establishes fundamental guidelines of universal rights, formalizes ENEVA's commitment to human rights recognized by national and international legislation and reaffirms non-discriminatory practices and human dignity in the work environment, projects and operations.

2. APPLICATION

This Policy is applicable to all Employees and to all areas that make up ENEVA's organizational structure, and joint ventures in which ENEVA has control, as well as to Third Parties that interact with ENEVA or act on its behalf.

The provisions of this Policy complement the guidelines established by ENEVA's Code of Conduct, the Code of Conduct for Third Parties, as well as other published internal guidelines, policies and procedures.

3. REFERENCES

- **PL.CRP.CMP.002** - Code of Conduct
- **DT.CRP.CMP.008** - Third Party Code of Conduct
- **DT.CRP.CMP.006** - Third Party Relationship Guideline
- **DT.CRP.CMP.001** - Consequence Management Guideline
- **DT.CRP.CMP.005** - Diversity, Equal Opportunities and Respect Guideline
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Fundamental Conventions of the International Labor Organization (ILO)
- Universal Declaration of Human Rights
- Decree No. 12.304/24
- Guidelines, targets and indicators of the Sustainable Development Goals (SDGs)
- UN Global Compact and the Sustainable Development Goals (SDGs) approved by the United Nations
- UN International Covenant on Civil and Political Rights

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- International Covenant on Economic, Social and Cultural Rights of the United Nations (UN)
- International Finance Corporation (IFC) Performance Standards
- Guiding Principles on Business and Human Rights

4. DEFINITIONS

- **Bullying** - abusive behavior that is repeated and prolonged and that violates dignity, self-esteem, physical or psychological integrity and that can be manifested through gestures, words and attitudes.
- **Sexual harassment** - embarrassment with a sexual connotation in the workplace that can manifest itself through aggressive verbalizations of a sexual nature, insinuations and derogatory jokes, without consent.
- **Human Rights** - all fundamental rights, universal and inherent to all human beings, internationally recognized by the Universal Declaration of Human Rights of the United Nations and other applicable norms, to be ensured to all, regardless of social class, race, nationality, religion, culture, profession, gender, sexual orientation or any other condition that may differentiate human beings. They include the right to life and liberty, to opinion and expression, to work, to education, among others.
- **Discrimination** - any distinction, exclusion, restriction or preference based on race, color, descent, national or ethnic origin, sexual orientation, gender identity, religion or age. It manifests itself as the conduct of transgressing a person's rights, based on reasoning without adequate knowledge of the matter, making it unjust and unfounded.
- **Diversity** - Plurality of identities that characterize the groups and societies that make up humanity, including ethnicities, races, sexual orientations, gender identities, religions and cultures.
- **Child sexual abuse** - abuse of power in which children and adolescents are used for sexual gratification, being induced or forced into sexual practices. The term sexual violence encompasses the concepts of sexual abuse and exploitation.
- The other terms described throughout the regulations will have their meanings described in the Compliance Glossary created by the Company.

5. PRINCIPLES AND GUIDELINES

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Eneva works actively to ensure respect for human rights in its operations and value chain, seeking to prevent and mitigate any adverse impact and, where necessary, implement measures for reparation and continuous improvement:

5.1. International commitments

This policy is governed by international human rights principles, covered and cited in the UN Universal Declaration of Human Rights.¹ This Declaration establishes that all human beings are equal before the law and should enjoy rights without distinction of any kind, be it race, color, sex, sexual orientation, origin or any form of discrimination. The document reaffirms the need to protect the fundamental rights, dignity and value of the human person in order to promote social progress.

The Universal Declaration even mentions that every human being has the right to life, liberty and that no one shall be subjected to slavery in any form.

The United Nations Human Rights Council unanimously endorsed the Guiding Principles on Business and Human Rights (UNGPs) in June 2011. They constitute an official guideline for companies in relation to the challenges of the theme of business and human rights. This regulation is also in line with these principles.

Finally, this policy is in line with the Sustainable Development Goals (SDGs), which seek to ensure human rights and Decree 12.304/24, which lists the need for the integrity program to mitigate social risks and ensure the protection of human rights.

5.2. Eneva's Commitments to Action

Eneva undertakes to:

- Conduct all your operations and business with respect for human rights and the dignity of all.
- Comply with and enforce applicable legal requirements and respect legislation, standards and good practices related to human rights, social rights and labor rights.
- Respect and practice freedom of union association and collective bargaining in all areas of operation, in accordance with applicable local legislation.
- Do not tolerate, allow, condone or carry out activities that involve any form of violation of the rights of local communities, traditional communities, ethnic minorities

¹ Adopted and proclaimed by the United Nations General Assembly (resolution 217 A III) on December 10, 1948

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and indigenous peoples living around the units where it operates.

- Do not tolerate, allow, condone or conduct business involving any type of child labor, forced labor, compulsory labor or labor in conditions analogous to slavery.
- Do not tolerate, allow, condone or conduct business involving sexual violence (exploitation or abuse) of children and adolescents and trafficking in human beings.
- Demand that Third Parties adopt the necessary measures to eliminate any form or modality of child labor, forced labor, compulsory labor or labor in conditions analogous to slavery in the development of their activities.
- Demand that Third Parties adopt the necessary measures to eliminate any form or modality of sexual violence against children and adolescents.
- Respect the rights, cultures, customs, heritage and livelihoods of indigenous peoples and traditional communities.
- Demand that Third Parties adopt the necessary measures to respect the freedom of union association and collective bargaining of their employees, rejecting all discriminatory practices and treating their employees fairly, with dignity and respect, and complying with all applicable labor obligations.
- Respect and value diversity and do not tolerate any practice of discrimination or harassment of any kind, in accordance with applicable legislation.
- Promote and maintain a safe and healthy working environment.
- Mitigate and remedy any human rights impacts and violations that it has caused or directly contributed to, whenever identified in its operations and units, under the terms set out in the Code of Conduct and the Code of Conduct for Third Parties, in addition to the provisions of applicable legislation.
- Adopt educational and awareness-raising measures among its employees and the production chain to disseminate respect for human rights, in order to ensure knowledge and practice of the principles established herein.
- Adopt an ongoing human rights assessment procedure in order to evaluate whether its regulations are effective in mitigating the risks of the company and its business partners being involved in serious human rights violations.
- Have mechanisms in place to detect possible human rights violations in order to stop such acts immediately and remedy them effectively and proactively.
- Establish a channel for complaints and deviations that is accessible to employees and Third Parties (www.contatoseguro.com.br/eneva or 0800 601 8679).

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- Establish a complaints channel accessible to communities near the Company's projects (0800-730-1060).
- Map risks and impacts related to human rights violations when considering new developments.
- Consider the risks of human rights violations in the due diligence process carried out when qualifying suppliers.
- Have mechanisms in place to receive reports related to potential human rights violations, with special attention to sexual violence against children and adolescents.
- Perform periodic training on preventing harassment and discrimination in its operations.

5.3. Human Rights and Stakeholder Relations

Interactions and relationships with Eneva's stakeholders must be guided by strict compliance with human rights.

- Suppliers, customers, service providers: must adopt measures to prevent non-compliance with human rights; adhere to Eneva's principles and full compliance with human rights and report any violations or potential violations based on awareness.
- Local communities: it is Eneva's responsibility to build and solidify effective dialog with communities, establish an open channel for complaints and reports related to human rights, and ensure that the Company's activities do not infringe on the rights of local communities surrounding its facilities.
- Collaborators: base relations on dialogue and respect, without any kind of discrimination or act that violates human rights and report any deviations to the Whistleblowing Channel.

6. GENERAL PROVISIONS

Eneva is committed to acting in accordance with the guiding principles and legislation applicable to human rights, seeking to raise awareness, respect and promote the company's activities in a sustainable manner.

We reaffirm our non-negotiable commitment to guiding our business in line with the protection of human rights and the rights of children, adolescents and other vulnerable groups, in order to positively influence the local development of the communities in which we operate.

We always seek to work collaboratively, encouraging diversity and stimulating constructive

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dialog.

We have mechanisms for receiving complaints and reports, which are important means of preventing possible impacts and human rights violations, and reporting them to the authorities when appropriate.

Failure to comply with the rules set out in this policy may result in disciplinary measures or the termination of the contractual relationship in the case of Third Parties.