CEMIG'S CORPORATE RISK AND INTERNAL CONTROL MANAGEMENT POLICY

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1. INTRODUCTION

Companhia Energética de Minas Gerais – CEMIG considers the integrated management of risks associated with the execution of its activities essential, identifying and implementing the necessary internal controls to create value for its customers, shareholders, employees, suppliers, society, and other stakeholders.

Commitment to effective corporate risk management is one of the foundations for sustainable growth and for achieving the objectives defined in the Company's Strategic Plan. This commitment is a core value that must be upheld by everyone working at CEMIG or acting on its behalf, including suppliers.

2. PURPOSES

I. Establish principles, guidelines, objectives, concepts, roles, and responsibilities related to Risk and Internal Control Management practices.
II. Enable the incorporation of a risk-based perspective into the Company's Strategic Plan, supporting decision-making following applicable regulations and best market practices.
III. Demonstrate appropriate risk and internal control management and monitoring, with transparency and in line with corporate governance principles.
IV. Promote the culture and best practices in risk management and internal controls at all levels of the Company, including their roles, responsibilities, and accountabilities.

3. SCOPE

This Policy applies to Companhia Energética de Minas Gerais – CEMIG, Cemig Geração e Transmissão S.A. – Cemig GT, and Cemig Distribuição S.A. – Cemig D.

This Policy is mandatory for all consolidated companies within Grupo CEMIG and applies to companies in which CEMIG holds equity interests, respecting their corporate procedures, in proportion to the relevance, materiality, and risks of the respective businesses. The Policy is also recommended for suppliers.

4. REFERENCES

- State-Owned Companies Law 13,303/2016, of 06/30/2016;
- State Decree 47,154/2017, of 02/20/2017;
- COSO – ERM: Committee of Sponsoring Organizations of the Treadway Commission – Enterprise Risk Management Framework (2004) and Enterprise Risk Management—Integrating with Strategy and Performance (2017);
- COSO – Committee of Sponsoring Organizations of the Treadway Commission - Internal Control – Integrated Framework (2013);
- COBIT – IT governance management framework – ISACA FRAMEWORK 2019;

• Audit Procedures Committee of the American Institute of Certified Public Accountants – AICPA;

• Sarbanes-Oxley Act of 2002, with emphasis on Sections 302 and 404;

• ABNT NBR ISO 31000:2018 – Risk Management: Principles and Guidelines;

• ABNT ISO GUIDE 73:2009 – Risk Management: Vocabulary;

• IIA's Three Lines Model (2020) – an update of the Three Lines of Defense (Institute of Internal Auditors);

• Brazilian Institute of Corporate Governance (IBGC) Code of Best Corporate Governance Practices – 6th Edition, 2023;

• NO-02.51 – Internal Controls Consequences and Accountability Policy – SOX (2022).

5. DEFINITIONS

For the purposes of this Policy, the following definitions shall apply:

5.1 Risk appetite: defines the boundaries within which CEMIG is willing to operate to achieve its strategic objectives. The aim is to achieve an appropriate balance between business risk exposure and the value created (or preserved).

5.2 Internal control: a process carried out by the governance structure, management, and other professionals of the Company, designed to provide reasonable assurance regarding the achievement of objectives, legal compliance, business protection, operational effectiveness and efficiency, reliability of reporting, and compliance with laws and regulations.

5.3 Key Risk Indicators (KRIs): indicators that signal potential exposure to a monitored risk and enable preventive corrective actions to be taken.

5.4 Materiality: a risk is deemed material when it meets or exceeds the defined risk appetite.

5.5 Action plan: activities needed to ensure the appropriate response to a risk, once the treatment approach has been defined. Its objective is to reduce the risk to a lower level of impact and/or likelihood, and it is characterized by having a defined beginning, middle, and end.

5.6 Remediation: actions implemented or to be implemented to address identified control deficiencies.

5.7 Risk: factors or events that, if they occur, may cause negative impacts or harm, hindering or preventing CEMIG from achieving its objectives. Risks may also support the decision-making process and represent potential opportunities.

5.8 Treatment: refers to the stage in which necessary actions are evaluated to address the identified risks, taking into account the Company's accepted risk appetite levels. Possible courses of action include:

- Avoid or Eliminate: not to initiate or to withdraw from a situation that could give rise to the risk.
- Accept: taking on the potential risk exposure without implementing additional mitigation measures.
- Enhance: increasing exposure to a known risk from a positive standpoint, aiming to capture opportunities and potential benefits associated with the situation.

- Mitigate: implementing new actions to reduce the likelihood and/or impact of the risk.

- Share and/or transfer: directly reducing the impact and/or likelihood of the risk by sharing responsibility with a third party.

6. PRINCIPLES AND GUIDELINES

6.1 To achieve and maintain transparency and quality in the information disclosed both internally and externally, seeking to enhance the Company's reputation in the market and to establish a competitive advantage in value creation for its shareholders and other stakeholders, by systematically, structurally, and timely adopting best practices in corporate governance.

6.2 To maintain the internal control and risk management systems in line with best market practices, aiming to ensure continued compliance with the requirements of the Company's business segments and regulatory and supervisory bodies.

6.3 To ensure access to risk and internal control management information through CEMIG's communication channels.

6.4 To support the decision-making process of the competent authorities, aiming to ensure informed and appropriate decisions directly related to the Company's strategic guidelines for sustainable growth, profitability, and value creation, regarding CEMIG's internal control and risk management environment.

6.5 To standardize and automate risk and internal control management mechanisms to improve synergy among the Company's three lines and competent authorities.

6.6 To ensure compliance with applicable laws and regulations, while promoting transparency and adherence to internal policies, rules, and procedures.

6.7 To ensure that the risk and internal control management framework leads to an understanding of the main risks arising from internal and external events affecting CEMIG, aligned with any changes in context, to ensure that such risks are efficiently and effectively identified, analyzed, assessed, addressed, monitored, and tested.

6.8 To promote a culture of risk and internal control management by demonstrating to all employees the relevance of these matters at CEMIG, thereby providing reasonable assurance in operations.

6.9 To ensure that each role in the risk management process is formally defined and assigned, with responsibilities clearly described, communicated, and understood by all parties involved.

6.10 To provide timely support to the Board of Directors, the Risk Committee of the Board of Directors, the Fiscal Council, the Audit Committee, the Executive Board, and other CEMIG governance bodies regarding the Company's risk and internal control management environment.

7. RESPONSIBILITIES

7.1. Board of Directors

- Establish general guidelines and promote the integration of risk and internal control management practices into the decision-making process.

- Evaluate and approve the Top Risks Matrix as well as the general guidelines for setting acceptable risk exposure limits (Risk Appetite).

- Evaluate and approve the Risk and Internal Control Management Policy.

- Ensure that risk and internal control management systems are implemented and monitored, aimed at preventing and mitigating 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.

- Monitor the outcomes of the risk and internal control management processes through executive reports.

7.2 Risk Committee of the Board of Directors

- Periodically monitor the risk and internal control management process, reporting the most relevant matters to the Board of Directors.

- Support the Board of Directors in defining the Top Risks Matrix and the general guidelines for setting acceptable risk exposure limits (Risk Appetite).

- Review all materials submitted to the Board of Directors regarding the Company's risk and internal control management and issue a prior opinion on such matters.

7.3 Executive Board

- Ensure the application of the principles and guidelines outlined in this Policy and the effectiveness of risk and internal control management procedures.

- Promote a culture of risk and internal control management at CEMIG and strengthen the roles of the First and Second Lines.

- Submit the Top Risks Matrix and the general guidelines for setting acceptable risk exposure limits (Risk Appetite) to the Board of Directors for review and validation.

- Submit the Risk and Internal Control Management Policy to the Board of Directors for review and validation. Participate in the process of identifying, prioritizing, and validating risks within their respective departments, and monitor the treatment of business risks during the execution of the Strategic Plan.

- Ensure the timely and satisfactory implementation of internal controls for the risks inherent to the processes under their respective departments.

- Evaluate the accuracy of the risk management process through periodic reports, discussing and validating, as a collective body or individually by department, the assessments presented by risk owners, and define the treatment of risks according to the risk appetite approved by the Board of Directors.

7.4 First Line

The first line is composed of risk and internal control owners, business areas, management units, and processes. It is responsible for managing risks and internal controls, assisting in risk identification,

and providing timely updates on the status of risks, controls, and any changes that may impact CEMIG's internal control environment. Additionally, it is responsible for the following activities:

- Ensuring the timely and adequate execution of internal controls under its responsibility.
- Supporting the evaluation of CEMIG's risk and internal control management environment.
- Assessing and validating risk mapping and descriptions of controls and their respective owners, as presented in CEMIG's Risk and Internal Control Matrix.
- Assessing and validating action/remediation plans resulting from evaluations of the risk and internal control management environment.
- Proposing urgent/emerging risks in a timely manner.
- Reporting risks to relevant stakeholders, together with the second line, for proper handling.
- Notifying the Second Line of any changes in legislation or procedures that affect a given process and require a review of the corresponding control.
- Promptly communicating the need to adjust internal controls or any incidents identified, to safeguard CEMIG's internal control environment.

Three key agents play an essential role within this Line: risk owners, internal control owners, and focal points. Their main responsibilities are as follows:

7.4.1 Responsibilities of Risk Owners

- Identifying, analyzing, assessing, treating, and monitoring risks in an integrated manner.
- Promptly implementing proposed risk treatment action plans, with support from the respective owners.
- Complying with the guidelines and definitions established by the Second Line.
- Continuously monitoring the risk landscape to reassess or identify potential risks that require the implementation of preventive and mitigating controls.
- Monitoring risk compliance to ensure adherence to internal and external regulations.
- Regularly monitoring KRIs to ensure the effectiveness of controls and action plans.
- Analyzing proposals for improving existing controls and recommendations for new controls suggested by the owners, aiming to enhance risk management.
- Completing and validating risk-related information in the Risk Management support tool provided by the area responsible for the process, during the mapping stage.
- In the event of a potential risk materialization, the risk owner must proactively and immediately implement any mitigation and preventive actions they deem appropriate, based on the defined risk appetite. If additional support or validation from higher authorities is required, they must notify CEMIG's competent body.

- Requesting support from the Second Line to implement mitigation and preventive actions for the risks under their responsibility, whenever necessary.

7.4.2 Responsibilities of Internal Control Owners

- Timely and satisfactorily executing the controls under their responsibility according to established procedures and frequency, documenting each step and storing all necessary evidence, and making such documentation available to the internal or external audit and/or other governance areas of the Company upon request.

- Promptly informing the internal controls area about the need to update the controls under their responsibility.

- Assessing and seeking clarification on any reported deficiencies and/or absence of controls, to ensure clear, objective, and effective responses.

- Promptly establishing and implementing action plans stemming from the remediation of ineffective or insufficient controls, as well as for any identified control gaps.

7.4.3 Responsibilities of Action Plan Owners

- Managing the Action Plan by promptly reporting its status upon request and ensuring its effective and efficient completion within the established deadline, to mitigate the associated risk.

- Working with the Focal Point to ensure that updates to the Action Plan are properly recorded, such as the completion percentage, mitigation effectiveness, any rescheduling of deadlines, and the inclusion of evidence regarding the progress of the Action Plan.

7.4.4 Responsibilities of the Focal Point

- Serving as the Focal Point for risk and internal control management within their Board/Superintendency/Management, as appointed by the Risk Owner or Executive Officer.

- Promoting a culture of risk and internal control management across the Company, maintaining and strengthening an appropriate environment of operational controls to ensure the effectiveness and continuity of business operations within their respective business areas.

- Ensuring the mapping of risks and internal controls, supporting treatment actions, updates, and addressing remediations as necessary.

- Monitoring and acting to ensure compliance with deadlines and the quality of risk-related actions within their area of responsibility, for approval by the Risk Owner.

- Reporting to the Risk and Internal Control Management any risk materialization or incident, as well as any relevant information within the context of Corporate Risks.

7.5 Second Line

Regarding risk and internal control management, the second line is composed of the Risk and Internal Control Management, whose responsibility is to support the risk and internal control management process. It also has the following responsibilities:

- Define the methodology, processes, and infrastructure required for risk and internal control

management consistently and efficiently.

- Develop and implement policies, standards, and procedures to guide CEMIG's departments regarding the approach, communication, and roles and responsibilities related to risk and internal control management procedures.

- Promote awareness-raising initiatives for the First Line and establish a corporate training schedule for all CEMIG audiences, aiming to foster a culture of risk and internal control management throughout the Company.

- Provide support to the First Line by offering guidance and recommendations on CEMIG's internal control and risk management procedures.

- Report to the Executive Board and the Board of Directors on the status of risk and internal control management processes, upon request.

- Periodically update and review the Top Risks Matrix to ensure its alignment with changes to CEMIG's Strategic Plan and other relevant changes in the Company's environment, and submit it to the Executive Board and Board of Directors for analysis.

- Periodically perform risk assessments to keep the Internal Controls Risk Matrix up to date, ensuring its alignment with CEMIG's Strategic Plan and other significant changes in the Company's environment.

- Implement and monitor KRIs to enhance the effectiveness of risk and internal control management processes.

7.6 Third Line

The third line is formed by the Internal Audit Superintendence, which is responsible for adding value and improving operations through a systematic and disciplined approach, with an emphasis on the Strategic Plan and the Company's main risks, including fraud risks. In addition, its responsibilities include, but are not limited to:

- Assessing the effectiveness of the corporate governance process and of the corporate risk and internal control management system.

- Reporting the results of audit work to governance forums, with an emphasis on the status of action plans for process improvement.

- Assessing the effectiveness of the internal control structure over financial statements, especially regarding compliance with the Sarbanes-Oxley Act (SOX), and issuing periodic reports to the responsible parties and the Company's governance bodies.

- Promoting discussions aimed at disseminating a culture of internal controls, risk mitigation, and compliance with regulations applicable to the Grupo CEMIG companies.

- Performing effectiveness tests on controls related to risks.

8. CORPORATE RISK CLASSIFICATION AND MANAGEMENT PROCESS

8.1 Risk Classification

At CEMIG, risks are classified by type and by nature.

8.1.1 By type:

- Top Risks:

1. risks measured on the heat map in the worst-case scenario (WCS) that fall within the red zone, considering all five (5) dimensions, or within the financial dimension (F) with high or very high impact;

2. macroprocess risks identified by the Executive Board, the Risk Committee of the Board of Directors, and the Board of Directors itself, through consultation or express resolution, as relevant and requiring priority treatment.

- Macroprocess Risks: associated with more than one organizational process.

- Process Risks: associated with a single organizational process.

8.1.2 By nature:

Nature	Description
External	Associated with changes in the external context, whether due to significant political and economic shifts at the national or international level, which may result in the failure to implement the adopted strategies.
Business Strategy	Associated with strategic decision-making and with changes in general internal conditions within the Company, with a relevant impact on its business model and strategy.
Economic and Financial	Associated with ineffective financial management and control, and with market fluctuations (e.g., credit availability, exchange rates, interest rate changes).
Legal and Regulatory Compliance	Associated with non-compliance with external legislation applicable to the business, especially sector-specific regulations, and/or with failure to draft, disseminate, and comply with its internal rules and procedures. This includes penalties related to non-compliance with Legislation, Environmental Standards/Policies, and CEMIG's Sustainability Guidelines.
Compliance	Associated with the guidelines of CEMIG's Compliance and Anti-Bribery Policy. It refers to unethical behavior that may lead to fraud, corruption, and/or conflicts of interest, resulting in financial losses and/or damage to the Company's image.
Operational	Associated with deficiencies, inadequate management of internal processes, or the influence of external events, resulting in losses in quality, performance, customers, assets, and safety (includes Information Technology, Information and Data Security, and Telecommunications). Also encompasses deficiencies in people and succession management processes, union relations, organizational climate, occupational safety, and resistance to new market practices.

Socio-environmental	Associated with deficient or inadequate environmental and social management, with an impact on the environment and society. Also includes the potential effects of climate change on the business, which may hinder new ventures or the expansion of production capacity.

8.1.2.1 Compliance risks, regardless of their level of exposure, are classified by type as macroprocess risks, as they permeate all of the Company's processes and have specific characteristics, such as zero risk appetite, the need for treatment primarily through mitigation, and the impossibility of complete elimination. This classification enables the strict and consistent management of such risks. They are more effectively managed through preventive actions, continuous process monitoring, and guidance on behavior and decision-making in compliance with applicable regulations. However, given their nature and scope, they fall under the responsibility of executive officers.

8.2 CEMIG's Corporate Risk Management Methodology

The risk management process is structured into six (6) stages, as described below:

8.2.1 Planning

Based on the guidelines approved in the multi-year Strategic Plan and the definitions outlined in the Risk and Internal Control Management Work Plan, the Corporate Risks Matrix is identified, broken down by type of risk.

8.2.2 Risk Identification

This stage involves assessing business processes and consists of searching, recognizing, and describing risks. At this stage, the causes, impacts, and scope are identified and validated by the risk owners.

8.2.3 Risk Analysis

This involves defining the probability and quantitative and/or qualitative impact attributes. Such analysis considers the effect of existing controls (residual risk).

8.2.4 Risk Assessment

This involves comparing the results of the risk analysis with the established criteria to determine whether further action is needed. If further action is necessary, the decision is made to consider risk treatment options to establish action plans and controls.

8.2.5 Risk Treatment

This involves identifying actions to address risks, such as controls and action plans. The type and level of response/prioritization depend mainly on the materiality and type of the risk, based on the defined risk appetite.

8.2.6 Risk Monitoring

Risk Monitoring is carried out through the tracking and critical analysis of action plans, internal control evaluations, and risk predictive indicators (KRIs), as well as indicators for monitoring and following up on the risk management process, and support in the event of incidents and materialized

risks. The objective is to improve the quality and effectiveness of the design, implementation, and results of the process. The monitoring activity should be performed continuously across CEMIG's entire risk universe.

This stage also includes communication and reporting to the appropriate forums. The communication process must be established in three segments:

- promotion of CEMIG's risk culture;
- addressing decision-making points at the competent bodies;
- periodic reports on the universe and scenario of corporate risks and internal controls.

8.3 CEMIG's Internal Controls Management Methodology

The Internal Controls process is based on the following structure:

8.3.1 Control Environment

It is the organization's internal structure that establishes the foundation for conducting the internal control process at CEMIG, influencing the behavior and attitude of all involved regarding internal controls, including integrity, ethical values, and commitment to risk management.

8.3.2 Risk Assessment

Encompasses the identification and measurement of risks that may prevent CEMIG from achieving its objectives, as well as defining the strategy for implementing and/or adjusting internal controls to mitigate these risks.

8.3.3 Control Activities

These are the measures and actions implemented to mitigate identified risks, including preventive, detective, and corrective controls.

8.3.4 Information and Communication

Involves the timely collection and dissemination of information to ensure that all stakeholders understand the relevant risks present in each process and their responsibilities in management, including the execution of internal controls.

8.3.5 Monitoring Activities

Ongoing or separate processes that assess the effectiveness of the internal control environment over time, identifying and communicating deficiencies that need to be corrected.

9. MISCELLANEOUS

All new procedures related to Corporate Risk and Internal Control Management, defined in specific instructions, must comply with this Policy, and once disclosed, become an integral part of this Policy.

COMPLIANCE BOARD – DCI
*** Policy approved by the Board of Directors on 07/24/2025**