
GRUPO CEMIG'S RELATED-PARTY TRANSACTION POLICY

1. PURPOSE

1.1 Establish the Related-Party Transaction Policy applicable to Companhia Energética de Minas Gerais – CEMIG (“Cemig”), its wholly-owned subsidiaries, subsidiaries, and affiliates (jointly, for the purposes of this Policy, “CEMIG”), in compliance with the provisions of the respective Bylaws and applicable legislation, in order to define the procedures to be observed in situations involving Related-Party Transactions and/or potential Conflicts of Interest, ensuring that decisions are made in compliance with the best interests of CEMIG and the best corporate governance practices.

2. DEFINITIONS

2.1 **Market Conditions:** transactions that meet competitiveness (price, term, risk, and conditions consistent with those practiced in the market), compliance (adherence to contractual terms and responsibilities, legal standards, and those issued by regulatory authorities, as well as information security controls), transparency (properly disclosure of information), equity (impartiality), and commutativity (equivalence of considerations based on market parameters in similar transactions) to serve CEMIG's best interest.

2.2 **Conflict of Interest:** lack of independence of a person or entity regarding the matter to be discussed, thus enabling influence in the decision-making process and/or decision-making without considering CEMIG's interests, to secure gains for oneself or for others with whom a relationship is maintained; or being in a situation that could interfere with one's ability for unbiased judgment, even if such a relationship does not qualify as a Related-Party Transaction. The definition of Conflict of Interest includes the personal interest of the agent.

2.3 **Significant Influence:** holding and/or exercising the power to participate in the financial or operational policy decisions of the investee, without controlling it, which can be achieved through equity interest, statutory provisions, shareholders' agreement, or similar instruments, as well as the power to influence management decisions, even without direct or indirect participation, but assuming risks or benefitting from it.

2.4 **Related Parties:** for the purposes of this Policy, CEMIG's related parties are:

- a) its controlling shareholders, minority shareholders with Significant Influence, CEMIG's subsidiaries and affiliates, as well as the subsidiaries and affiliates of its controlling shareholders;
- b) its administrators and members of the Fiscal Council and Audit Committee;
- c) legal entities that have administrators in common, appointed by controlling shareholders, with Significant Influence;
- d) any entity that provides post-employment benefit plans to the employees of CEMIG or its Related Parties mentioned in the previous paragraphs;
- e) legal entities in which CEMIG holds or exercises Significant Influence.

2.5 Government authorities legally responsible for regulation, oversight, and licensing are not considered Related Parties. Acts, processes, or decisions representing compliance with the requirements or obligations issued by such authorities do not fall within the concept of this Policy.

2.6 Related-Party Transaction: legal transaction, onerous or gratuitous, entered into between CEMIG and the party falling within the concept of Related Party, according to the definition outlined in this Policy.

3. PRINCIPLES

3.1 To ensure compliance with the interests of CEMIG and its shareholders, the Declaration of Ethical Principles, the Code of Professional Conduct, as well as this Policy, under applicable legislation, the following principles must be complied with:

3.1.1 **Commutativity:** negotiation of equivalent conditions between the parties to reflect conditions not less or more favorable than those that would be negotiated with third parties other than the Related Parties, under the same circumstances or in similar scenarios, ensuring a beneficial relationship for all parties involved.

3.1.2 **Equivalence of Considerations:** definition of mechanisms preventing discrimination or privilege among the parties involved, and practices that ensure that insider information or business opportunities will not be used to benefit individuals or third parties, always observing prices, terms, risks, conditions, and usual market practices.

3.1.3 **Transparency:** broad and timely disclosure to the market of Transactions involving Related Parties, where applicable, while maintaining the confidentiality of information when required, as well as the obligation to include Related-Party Transactions in CEMIG's financial statements and information.

3.1.4 **Impersonality, Impartiality, and Independence:** a condition in which the equivalence of commitments and obligations between the parties involved is observed, without benefitting any of them or a third party related to them, and exercising impartial and transparent judgment aligned with CEMIG's best interest.

3.1.5 **Publicity:** timely, homogeneous, clear, and objective availability and disclosure of information regarding Related-Party Transactions and Conflicts of Interest, not limited to those of a mandatory nature and/or due to legal, administrative, or judicial provisions, subject to the Information Disclosure Policy.

3.1.6 **Legality:** compliance, in all negotiations involving Related-Party Transactions or Conflicts of Interest, with applicable legislation and regulations, including guidelines of the Brazilian Electricity Regulatory Agency and the Brazilian Securities and Exchange Commission, as well as other administrative, regulatory, fiscal, and control regulations from bodies or entities to which CEMIG is subject.

3.1.7 **Non-Burdening of One Party for the Benefit of Another:** in negotiations involving conditions and obligations of Related Parties, in addition to Market Conditions, commutative conditions between the parties must be observed so as not to burden or cause disproportionate loss among the parties involved in the negotiations.

3.1.8 **Transaction Record:** CEMIG's competent internal body(ies) responsible for negotiating and managing projects or processes involving Related-Party Transactions must maintain an updated written record, and, if possible, an electronic record, with all data and information related to the Transaction, as well as the related documents, including Proposals for Resolutions of CEMIG's Executive Board and/or Board of Directors.

4. TRANSACTIONS WITH RELATED PARTIES AND POTENTIAL CONFLICTS OF INTEREST

4.1 Shareholders in General Meetings, Board of Directors members, Executive Board members, Fiscal Council members, Audit Committee members, as well as employees and other stakeholders, must act not to influence CEMIG's decisions to benefit themselves or any party represented by them, acting according to this Policy. They are prohibited from intervening in any Transaction in which they have a conflicting interest with CEMIG, whether of a professional or personal nature.

4.1.1 Regarding shareholders, exercising a vote directly or through a representative with the intention of causing harm to CEMIG or other shareholders, or obtaining an undeserved advantage for oneself or others, resulting in or capable of resulting in financial, economic, or reputational damage to CEMIG or other shareholders, will be deemed abusive, subject to an administrative process to determine liability.

4.1.2 Whenever necessary and upon the appointment or designation of key management personnel, they must provide a statement informing their potential Conflict of Interest with CEMIG. Also, whenever necessary, due to statutory or legislative changes, especially related to regulations from the Brazilian Electricity Regulatory Agency – ANEEL, Brazilian Securities and Exchange Commission – CVM, and B3 S.A. – Brasil, Bolsa, Balcão (B3), they cannot claim ignorance of this Policy.

4.2 When a potential Conflict of Interest is identified, the individual or legal entity involved must promptly declare their impediment, refraining from participating in any negotiation, discussion, or decision-making process related to the Transaction, even indirectly, to protect CEMIG's interests.

4.2.1 In the situation described in item 4.2, when a member of the Board of Directors, Executive Board, Fiscal Council, and/or Audit committee is involved, any other member of these statutory bodies who becomes aware of the potential Conflict of Interest may disclose the matter so that the necessary investigations can be carried out.

4.2.2 The failure to voluntarily disclose the matter by a member of the Board of Directors, Executive Board, Fiscal Council, and/or Audit Committee may be characterized as a violation of the duties of trust, loyalty, purpose, and information to which they are subject, and the relevant statutory body shall, in this case, initiate an administrative process to determine liability.

4.3 The Board of Directors is the statutory body responsible for analyzing, monitoring, and resolving on Related-Party Transactions, especially in transactions and negotiations involving CEMIG's common parent company or affiliates and subsidiaries of the common parent company.

4.3.1 Unless otherwise provided for in the Bylaws, the following shall be observed regarding the competence and authority to resolve the transactions covered by this Policy, once its guidelines are fulfilled:

4.3.1.1 Transactions with minority shareholders with significant influence or with the majority shareholder: exclusive competence and authority of the Board of Directors;

4.3.1.2 Capital subscription or payment in subsidiaries and affiliates: up to R\$20 million, authority of the Executive Board. Amounts over R\$20 million, authority of the Board of Directors;

4.3.1.3 Other transactions: up to R\$100 million, authority of the Executive Board. Amounts over R\$100 million, authority of the Board of Directors;

4.3.1.4 Cases approved by the Executive Board must be individually reported, including their main attributes, to the Board of Directors before the meeting to be held in the month following the resolution.

4.3.1.5 The scope of the Internal Audit work shall annually include the analysis of approved Transactions involving Related Parties.

4.3.2 If a potential Conflict of Interest is identified, whether by self-declaration or by declaration of any member of the collegiate body, the party involved must withdraw from the resolutions on the matter.

4.4 Situations of potential Conflicts of Interest must be recorded in the minutes of the meetings of the Board of Directors or Executive Board, containing, at least, information about the Conflict of Interest and the subsequent prohibition of voting.

4.5 The body(ies) directly involved in the Transaction is(are) responsible for identifying each case in a preliminary analysis of the existence of Related Parties and/or a potential Conflict of Interest by analyzing the Transaction proposed and comparing it to the alternatives available in the market, in an informed and unbiased manner.

4.6 In cases where equity interest is held in a company but CEMIG does not hold the shareholding control, it shall adopt, in its duty to oversight, corporate governance and control practices proportional to the relevance, materiality, and risks of the business, considering the presentation of a report on the implementation of the Related-Party Transaction Policy.

4.6.1 In companies where a Board of Directors is not established, the responsibility for analyzing, monitoring, and approving Related-Party Transactions shall fall under the competence of the Executive Board of said company.

4.7 In the analysis of Related-Party Transactions and situations of potential Conflict of Interest, the following information should be considered in a guiding manner:

- a) compliance with the principles of this Policy;
- b) parties involved, considering potential existing interest and the nature of the relationship, even if CEMIG is not a direct party to the Transaction;
- c) description of the subject;
- d) terms and conditions of the Transaction, considering aspects of convenience and opportunity;
- e) the financial amount involved;
- f) guarantees and insurance to be provided, if applicable;
- g) existence of statements, limitations, commitments, and risks imposed on CEMIG;
- h) cases of termination and responsibility;
- i) prohibition to exclusivity;
- j) partner selection procedure, including conducting a bidding process, whenever applicable;
- k) methods for comparing market alternatives with third parties that do not fit within the concept of Related Parties described in this Policy; and
- l) any other information relevant to the analysis.

4.8 When taking into consideration each of the potential relationships with Related Parties, attention should be directed to the essence of the relationship and not merely its legal form.

4.8.1 If the Related-Party Transaction involves the sale or acquisition of assets, corporate restructuring, or capital subscription, the analysis must be accompanied by an evaluation report prepared by a specialized independent company.

4.8.1.1 In the case of wholly-owned subsidiaries, whose transaction is based on book value, the hiring of a specialized and independent company for the preparation of the evaluation report is not required.

4.9 Related-Party Transactions must be well-documented and stored to ensure full compliance with the oversight of regulatory and internal and external control bodies to which CEMIG is subject.

4.10 Loans to shareholders of Companhia Energética de Minas Gerais-CEMIG and members of the Board of Directors, Executive Board, Fiscal Council, and/or Audit Committee, whether directly or through Transactions involving third parties, are prohibited.

4.11 This Policy must be periodically reviewed for potential improvement and submitted to resolution by the Board of Directors.

ADÉZIO DE ALMEIDA LIMA
CHAIR OF THE BOARD OF DIRECTORS
