
CONFLICT OF INTEREST POLICY

Replaces NO-02.45,
of 04/16/2020

1. PURPOSE AND COVERAGE

1.1. This Policy aims to establish general guidelines for addressing actual, potential, or perceived conflicts of interest, in compliance with applicable legislation and the Cemig Code of Conduct, to promote transparency and an ethical corporate environment, as well as to ensure that Professionals perform their duties with honesty and integrity.

1.2. This Conflict of Interest Policy establishes objective criteria to guide the conduct of Professionals, helping to mitigate potential concerns, including those raised by regulatory and oversight authorities, as well as reputational risks.

1.3. This Policy applies to all Professionals of Cemig, Cemig Geração e Transmissão S.A. – Cemig GT, Cemig Distribuição S.A. – Cemig D, other wholly-owned subsidiaries, and controlled entities.

2. CONCEPTS AND DEFINITIONS

2.1. Senior Management: Cemig's Board of Directors and Executive Board;

2.2. Grupo Cemig: Cemig, its Wholly-Owned Subsidiaries, and Controlled Entities.

2.3. Professionals: Board of Directors members, Fiscal Council members, Audit Committee members, Executive Officers, Deputy Executive Officers, employees, contractors, and subcontractors of Cemig, Cemig Geração e Transmissão S.A. – Cemig GT, Cemig Distribuição S.A. – Cemig D, and other wholly-owned subsidiaries and controlled entities.

2.4. Conflict of Interest: a situation in which personal interests (including financial interests, family relationships, personal relationships, or similar interests) actually or potentially overlap with the interests of Grupo Cemig and may impair objective decision-making and result in decisions that are not in the best interests of Grupo Cemig.

2.5 Perceived Conflict of Interest: a situation in which a reasonable person could conclude that a Professional has not acted with honesty, integrity, or in the best interests of Grupo Cemig.

2.6 Potential Conflict of Interest: a situation that may develop into an Actual Conflict of Interest in the future.

2.7 Actual Conflict of Interest: a situation in which a conflict of interest clearly and effectively exists.

3. GUIDELINES

3.1. It is not possible to identify or anticipate every circumstance that may give rise to a conflict of interest. Accordingly, this Policy establishes principles, rules, and guidelines and provides examples of situations that are particularly common or sensitive within Grupo Cemig, without intending to provide an exhaustive list.

3.2. These guidelines reflect Senior Management's expectations regarding the conduct of Professionals and the manner in which conflicts of interest should be addressed within Grupo Cemig.

3.3. Internal rules and procedures shall be established or revised, as necessary, to ensure the effective application of the guidelines defined in this Policy.

3.4. Conflicts of interest in governing bodies

3.4.1. Before being nominated to serve on a governing body of a Grupo Cemig company, a candidate must declare the absence of any actual or potential conflict of interest involving the company to which they are being nominated and its controlling shareholder.

3.4.2. Any member of a governing body who identifies a matter or situation involving a conflict of interest must promptly disclose the potential conflict and refrain from participating in any negotiations, discussions, or decision-making processes related to the matter. Under no circumstances may such an individual attempt to influence the outcome of the matter, whether during or outside meetings.

3.4.3. If the conflicted Professional fails to disclose a potential conflict of interest, any other member of the body to which they belong who becomes aware of the situation must report it so that the appropriate review and assessment may be conducted.

3.4.4. Failure by a member of the Board of Directors, Executive Board, Fiscal Council, and/or Audit Committee to voluntarily disclose a potential conflict of interest may constitute a violation of the duties of loyalty, care, purpose, and disclosure applicable to such individual. In such cases, the competent statutory body may initiate administrative proceedings to determine responsibility.

3.4.5. If there is uncertainty as to whether a potential conflict of interest exists, the Professional must report such matter to the other members of the governing body, who shall determine whether a conflict of interest exists.

3.4.6. Minutes of meetings at which a potential conflict of interest has been identified must clearly record, at a minimum: i) the names of the conflicted Professionals; ii) the nature of the secondary interests that giving rise to the conflict of interest; iii) whether the conflict was identified by the Professional or by another member of the governing body; iv) the Professional's withdrawal from the resolution process; and v) the Professional's abstention from voting.

3.5. Termination of employment or management relationship with Grupo Cemig (Cooling-Off Period)

3.5.1. Unless expressly authorized by the Ethics Committee, the following situations involving a former executive officer or employees who had access to Grupo Cemig's material and confidential information during the 4 (four) months following the termination of their position or employment relationship shall constitute objective criteria for a conflict of interest:

a) to provide, directly or indirectly, any type of service to an individual or legal entity with whom they have maintained a significant professional relationship as a result of their position or employment;

b) to accept a position as an executive officer or Board member of, or otherwise establish a professional relationship with, an individual or legal entity engaged in activities related to the area of responsibility of the position previously held;

c) to enter into service, consulting, advisory, or similar contracts with Grupo Cemig's suppliers or competitors; and

d) to act, directly or indirectly, on behalf of private interests before Grupo Cemig.

3.5.2. Grupo Cemig's internal rules and procedures shall include mechanisms designed to prevent the situations described above, taking into account the specific responsibilities of each position, market practices, and applicable laws and regulations.

3.6. Engagement in outside professional activities

3.6.1. Professionals may engage in outside professional activities, provided that such activities do not create a conflict of interest and do not violate applicable laws or internal regulations. At a minimum, such activities must meet all of the following requirements: (i) they must not interfere with the individual's professional responsibilities; (ii) they must not be detrimental to Grupo Cemig's interests or reputation; (iii) they must not be carried out during working hours; (iv) the individual's position or access to non-public information must not be used for personal gain or for the benefit of third parties; (v) Grupo Cemig resources must not be used; and (vi) the activity must be disclosed to the individual's immediate supervisor or to the governing body of which the individual is a member.

3.6.2. Serving as a statutory executive officer of a company within Grupo Cemig, or of a company to which the individual was appointed by a Grupo Cemig company, while simultaneously engaging in outside professional activities that require a level of time commitment incompatible with the performance of such duties, shall constitute an objective conflict-of-interest situation.

3.6.3. Serving on Boards of Directors or statutory committees, or providing consulting services or services as an independent professional to companies that may be considered competitors of, or that operate in the same market as, Grupo Cemig companies, shall also constitute an objective conflict-of-interest situation, unless such activity is in the interest of Grupo Cemig and has been expressly authorized by the Ethics Committee or approved by Cemig's Executive Board or Board of Directors.

3.7. Nepotism and the engagement of service providers by Grupo Cemig

3.7.1. The following are considered objective criteria for conflict of interest:

a) direct or indirect involvement in the engagement, through waiver of bidding requirements, exemption from bidding process, or other legally permitted exceptions to competitive procurement, of spouses or relatives of Grupo Cemig executive officers and employees, whether by blood or affinity, in a direct or collateral line up to the third degree, or of companies in which such spouses or relatives hold an interest, for the provision of services, execution of works, or supply of materials, equipment, and products;

b) direct or indirect involvement in the management or administration of contracts or other transactions with suppliers in which the Professional has a financial, family, or personal interest, as well as involvement in or influence over the selection or engagement of such suppliers; and

c) direct or indirect hierarchical or functional reporting relationships between Professionals and their spouses or relatives, whether by blood or affinity, in a direct or collateral line up to the third degree, as defined by the Civil Code, except where it is not possible to assign an employee already employed by the Company, or hired through a public recruitment process, to another area that would eliminate such reporting relationship.

3.7.2. Whenever a Professional becomes aware, in the exercise of their functions, of a situation that may impair their independence — whether actual, potential, or perceived — due to family or personal relationships with a counterparty, they must withdraw from the transaction and promptly disclose the situation to their immediate superior or to the governing body of which they are a member.

3.8. Ownership interests in other companies

3.8.1. The following are considered objective criteria for conflict of interest:

a) holding a significant ownership interest in, or being a partner of: i) strategic suppliers or suppliers with a significant economic impact on Grupo Cemig; ii) suppliers whose revenues obtained from services provided to Grupo Cemig exceed 50% of their annual revenue; and iii) direct or indirect competitors of Grupo Cemig.

3.8.2. Every employee must submit a periodic declaration to the Payroll and Benefits Management Department (SC/FB) regarding their ownership interests in other companies, both before joining Grupo Cemig and, if such interests exist, at least annually thereafter.

3.9. Receiving and offering gifts, promotional items, and courtesies

3.9.1. Grupo Cemig is aware that the offering and acceptance of gifts, promotional items, and courtesies are common business practices and may, when conducted appropriately, help strengthen professional relationships and foster a positive business environment. However, such practices may also create undue influence or the appearance of undue influence, potentially affecting a Professional's ability to make decisions in the best interests of Grupo Cemig.

3.9.2. To minimize the risk of inappropriate influence, Grupo Cemig shall establish rules and approval requirements governing such practices to prevent conflicts of interest, as well as potential acts of fraud and corruption.

3.10. Related-Party Transactions

3.10.1. Grupo Cemig shall maintain a Related-Party Transactions Policy establishing the procedures to be followed in situations involving Related-Party Transactions and/or potential conflicts of interest, ensuring that decisions are made in the best interest of the Company and in accordance with corporate governance best practices. Such Policy shall be broadly disclosed.

3.11. Ongoing Training

3.11.1. Grupo Cemig shall provide ongoing training programs designed to promote awareness of this Policy and the internal regulations addressing conflicts of interest, as well as to prepare Professionals to address potential conflict-of-interest situations with transparency, impartiality, and fairness.

4. RESPONSIBILITIES

4.1. All Professionals are responsible for complying with and promoting the principles and requirements outlined in this Policy, as well as for encouraging compliance by other Professionals.

4.2. Any Professional involved in an actual or potential conflict of interest must immediately cease such a situation and promptly report it to their immediate supervisor or to the governing body of which they are a member. Such supervisor or governing body shall be responsible for determining whether any specific rule applies to the circumstances and for taking the necessary measures to prevent, eliminate, or mitigate the conflict.

4.3. The Ethics Committee shall be responsible for receiving and addressing inquiries and reports regarding conflicts of interest, ensuring confidentiality, and protecting the identity of individuals seeking guidance or submitting reports.

4.4. It is the responsibility of Cemig's compliance area to review and propose amendments to this Policy whenever necessary.

BOARD OF DIRECTORS

*** Policy approved by the Board of Directors on 11/11/2022**