

COMPLIANCE AND ANTI-FRAUD POLICY

Replaces No-02.43,
of 12/12/2019.

1. INTRODUCTION

This Compliance and Anti-Fraud Policy (Policy) corresponds to the Compliance Program of Companhia Energética de Minas Gerais – Cemig (Cemig or Company), Cemig Distribuição S.A. (Cemig D) and Cemig Geração e Transmissão S.A. (Cemig GT) (together, for purposes of this Policy, Cemig), under the terms of applicable legislation and regulations, in particular Law No. 12,846/2013, Federal Decree No. 11,129/2022, the Federal Sentencing Guidelines and the Foreign Corrupt Practice Act, and represents the consolidation of the guidelines that aim to guarantee Cemig's commitment to the adoption of a high standard of integrity and normative and legal compliance in the conduct of its business.

Cemig values the prevention and fight against fraud, corruption and any and all acts that may represent deviations in relation to the required ethical conduct or established Internal and External Standards, and relies on the dedication and diligence of all Cemig Professionals at Service so that unlawful or unethical acts are not committed in your name.

1.1. Scope

The Policy applies to all members of the Board of Directors, the Fiscal Council, the Audit Committee and the Executive Board, deputy directors, *ad-nutums*, *advisors*, assistants, superintendents, managers, managers, employees, contractors, service providers, interns and young apprentices of Cemig, as well as all individuals or legal entities that may represent Cemig, acting as consultants, representatives, agents, brokers, among other intermediaries acting on your behalf (Professionals at the Service of Cemig). It also serves as guidance for companies in which Cemig holds direct or indirect shareholdings.

1.2. Definitions and concepts

For the purposes of this Policy, it is understood as:

1.2.1. **Senior Management:** composed of the Executive Board and the Board of Directors.

1.2.2. **Compliance:** comply with or comply with the Internal and External Standards and conduct activities in accordance with the established standards of ethical conduct.

1.2.3. **Conflict of Interest:** is the overlapping of particular interests (financial, family or affective relationships, among others) with those of Cemig, which may result in decisions and results that are detrimental to the Company.

1.2.4. **Due Diligence:** verification work carried out in order to evaluate a particular asset or set of activities regarding the adherence of statements and reports in relation to the applicable facts and standards.

1.2.5. **Cemig Group:** group formed by Cemig and its wholly-owned subsidiaries, subsidiaries and affiliates.

1.2.6. **Leadership:** composed of Cemig's directors, deputy directors, superintendents, managers and managers.

1.2.7. **Internal and External Rules:** laws, decrees, regulations and other regulations of a similar nature, issued by competent authorities in Brazil and abroad, bylaws of Cemig Group companies, internal regulations, organizational rules, policies and procedures, among other regulations of a similar nature, circulars, memoranda and other formal means, and obligations established between parties by contract or other legal instrument, as the commitment to the principles of the United Nations Global Compact – UN regarding the subject, especially Principle Number 10 - "Fight corruption in all its forms, including extortion and bribery". This set of rules is restricted to those that Cemig is obligatorily or voluntarily subject to.

1.2.8. **Cemig Compliance Officer: Deputy Director of Compliance, Corporate Risks and Internal Controls.**

1.2.9. **Compliance Risks:** risks related to compliance failure and misconduct.

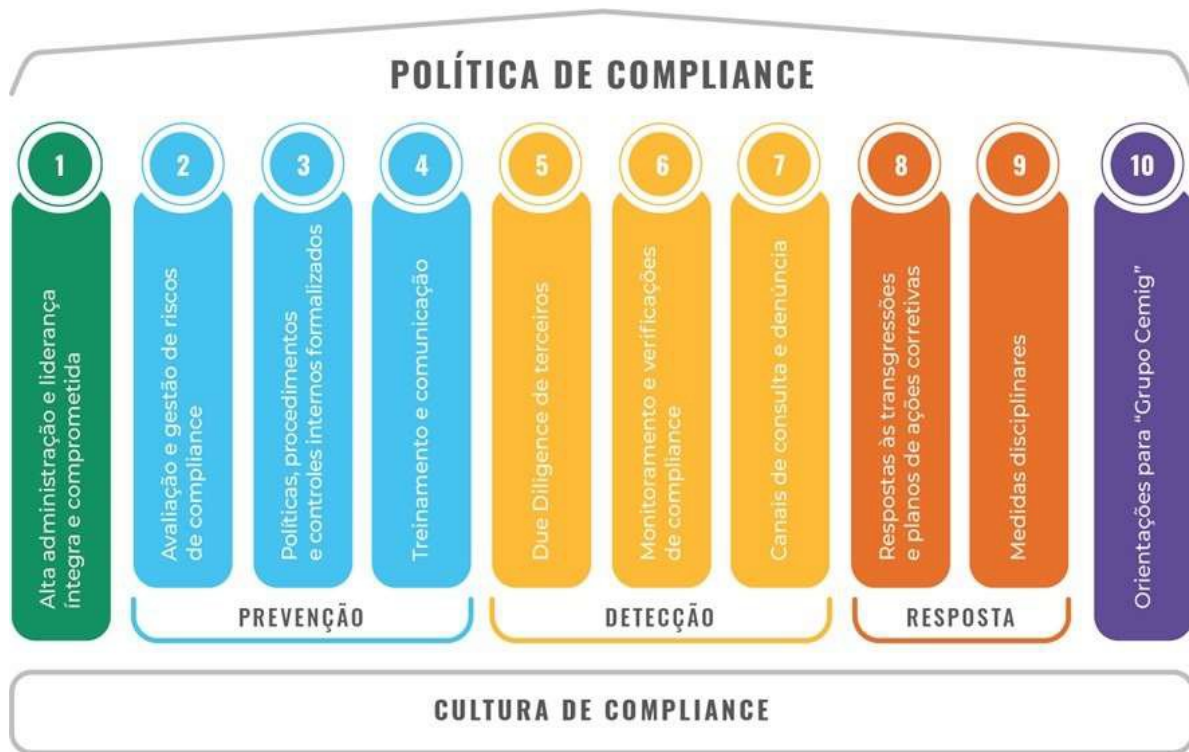
1.3. Goals

The Policy establishes guidelines and responsibilities that must be adopted in the daily exercise of Cemig's business, activities and relationships and guides on the implementation and maintenance of *Compliance Programs* in the companies of the Cemig Group, with the following objectives:

- i. promote an organizational culture that encourages ethical conduct and commitment to *best compliance practices and compliance with Internal and External Standards (compliance culture)*;
- ii. prevent, detect and respond to failures in compliance with internal and external rules to Cemig and misconduct;
- iii. focus on mitigating *compliance risks* prioritized by the Company; and
- iv. contribute to the motivation and productivity of employees, the preservation and enhancement of the Cemig brand and the minimization of nonconformities, penalties and regulatory fines for non-compliance with standards.

2. PILLARS OF THE COMPLIANCE POLICY

To achieve its objectives, this Policy is structured in the components that integrate it, as follows:



[Subtitle:]

| Compliance Policy | |
|---|--|
| 1. Senior management and honest and committed leadership. | 6. Monitoring and compliance checks |
| 2. Compliance risk assessment | 7. Consultation and complaint channels |
| 3. Formalized policies, procedures and internal controls | Detection |
| 4. Training and communication | 8. Responses to transgressions and corrective action plans |
| Prevention | 9. Disciplinary measures |
| | Response |

Compliance Culture

The pillars of this Policy comply with the best compliance practices, the applicable Internal and External Standards. Guidelines were defined for action in each of the pillars, observing Cemig's needs, as follows.

2.1 Senior Management and Leadership with integrity and commitment

The Company's Senior Management affirms its commitment and commitment to the Policy, its sponsorship and active participation, aiming at the fulfillment of the obligations defined therein. She recognizes that, together with Cemig's Leadership, she plays the role of model and example for other employees. In addition, it conducts its activities with ethics, integrity and repudiates any act of bad faith or that is in disagreement with the Internal and External Norms.

Professionals who may hold positions of Senior Management, members of the Fiscal Council, the Audit Committee, Cemig Leadership, *ad-nutums*, advisors, assistants or who are appointed by Cemig to hold positions of Senior Management or in Fiscal Councils or Audit Committees of companies of the Cemig Group must submit, prior to the appointment to the position, to an integrity assessment in order to ensure the probity of the Cemig Group.

To ensure the independence of the area of *compliance*, risk management and internal controls, Cemig's *Compliance Officer* must have the dismissal motivated and approved by the

Board of Directors. Cemig guarantees this manager the prerogative to involve the areas it deems necessary and to restrict access to information related to the conduct of its activities.

Cemig's *Compliance Officer* has the prerogative to report directly to the Board of Directors.

2.2 Compliance risk assessment and management

Cemig shall identify, periodically evaluate and manage compliance risks in the conduct of its activities, especially those related to fraud, corruption and conflict of interest in compliance with Internal and External Standards. Cemig's *Compliance Officer* may recommend the treatment of additional *compliance* risks for evaluation by the Corporate Risk Monitoring Committee.

The identification and assessment of *compliance risks* should be based, at a minimum, on the analysis of the following information: results of external and internal audits; disputes and agreements; complaints and consultations related to compliance with laws and regulations; trends in sectoral regulations; existence and sufficiency of policies and procedural instructions.

Compliance risks must be incorporated into the Company's Corporate Risk Matrix, and the assessment, procedures adopted and management of these risks will be conducted in accordance with Cemig's Corporate Risk Management and Internal Controls Policy.

The guidelines and measures related to each of the other pillars of this Policy should be directed primarily to mitigate these risks.

2.3 Formalized policies, procedures and internal controls

Cemig must maintain a set of documented policies and procedures that reflect its obligations to stakeholders, the relevant legislation and regulations, as well as standards of ethical conduct required in the performance of its activities and other commitments assumed. Those documents shall:

- be in accordance with the ethical principles and rules of conduct set forth in the Cemig Code of Conduct, be clear, objective, easily accessible and understandable, and always up to date; and
- provide compliance requirements for employees and third parties regarding compliance with Internal and External Standards and standards of conduct.

Cemig must maintain internal controls to ensure compliance with its policies, procedures and external obligations assumed, in addition to preventing, detecting and mitigating the occurrence of fraud, corruption and conflict of interest.

2.4 Training and communication

The Company's policies and procedures, the Cemig Code of Conduct and other Internal and External Rules relevant to Cemig must be communicated to all Professionals at the Service of Cemig (target audience), who must be trained whenever necessary.

Communication and training are aimed at raising awareness and empowering people and should be carried out in a practical and periodic manner, observing the guidelines below:

- Senior Management must actively participate in corporate communication and include compliance issues in its activities, giving legitimacy and credibility to the Policy;
- Cemig's deputy directors, superintendents, managers and managers must ensure the reach of communications and participation in the direct training to the target audience under his management; and
- the compliance area *should develop and implement communication plans* and compliance training, whose actions should be prioritized according to the identified risk mitigation needs and should promote an organizational culture of commitment to compliance with Internal and External Standards and ethical conduct.

Effective training appropriate to the roles and responsibilities of each segment of the target audience should be conducted, according to the levels of exposure to *compliance* risk. Employees must be adequately trained on the *compliance* procedures adopted by Cemig upon their admission, when assuming new responsibilities or functions and periodically during the exercise of their activities. In Cemig's contractual relations with other legal entities, measures must be taken so that the professionals involved are informed about the relevant rules and the applicable rules of conduct.

2.5 Third-party due diligence

Cemig shall take appropriate measures so that third parties, in the conduct of activities related to the Company, maintain standards of compliance and integrity compatible with those adopted by it, regulating, encouraging and supervising the adoption of compliance policies and procedures by these third parties.

Suppliers must be classified according to the level of risk they pose to the Company and integrity and compliance assessment procedures appropriate to the level of risk identified and the characteristics of the relationship between Cemig and the supplier must be carried out.

Similar measures to mitigate *compliance risks* should also be adopted in the relationship with third parties in operations of marketing, sponsorship, donation, agreement, acquisition and disposal of assets and equity interests.

2.6 Compliance monitoring and verifications

Cemig must develop appropriate actions to ensure that the Policy is complied with. These actions include:

- decentralized development, by Cemig's areas, of projects and activities aimed at the progressive execution of the guidelines of this Policy, which must be reported to the *compliance area*;
- mapping, by the *compliance area*, of the structural and priority measures, aiming at the implementation of this Policy, which must be executed by the other areas of Cemig;
- monitoring and reporting to Senior Management of the status of measures related to this Policy;
- periodic monitoring of *compliance* risks and internal controls related to these risks;
- evaluation of employees' perceptions of Cemig's culture of ethics and integrity and its commitment to compliance with norms and standards of conduct;
- evaluation of the effectiveness of communication and training provided for in the Communication Plan and Compliance Training;
- development and monitoring of internal controls and audit of internal controls, in order to ensure compliance with Internal and External Standards and the effectiveness of the Policy;
- carrying out checks to assess *compliance risks*; and,
- execution of compliance *Due Diligence* on third parties, according to their risk classification.

Compliance monitoring and verifications should be directed to monitor compliance risks, gather information on new risks, monitor compliance with the Cemig Code of Conduct and other Internal and External Standards. These mechanisms should highlight the risks that are not being sufficiently mitigated, enabling greater effectiveness in the review and improvement of this Policy. The results of these activities will compose the evaluation of the effectiveness of the Policy.

2.7 Consultation and reporting channels

Cemig must maintain widely publicized channels of consultation and denunciation, with mechanisms that guarantee anonymity and confidentiality, in which Cemig Professionals and any other interested parties may seek guidance or report illegal conduct.

Complaints received should be screened and investigated with due diligence and confidentiality. The Company must provide transparency to internal and external stakeholders about the results of the channel.

Cemig ensures that no form of retaliation is tolerated for the consultations and denunciations made through these channels and repudiates any discrimination or retaliation against whistleblowers who have, in good faith, reported transgressions, infractions, offenses, even if suspicious, in accordance with the policy of non-retaliation and non-identification established in the Cemig Code of Conduct. The Company shall take the necessary measures to ensure the protection of whistleblowers in good faith and the penalization of any employees who act in disagreement with these guarantees, regardless of the hierarchical level exercised by them.

2.8 Responses to transgressions and corrective action plans

When detecting non-compliance with Internal and External Standards or misconduct, Cemig must take the necessary measures to respond appropriately and prevent the recurrence of these occurrences.

Cemig must develop crisis management plans and elaborate, whenever necessary, corrective action plans, with the objective of minimizing any damage caused by the materialization of risks or by conduct that does not comply with Internal and External Standards. Responses to detected transgressions and crisis management plans and corrective actions should include, at a minimum, the immediate cessation of the transgression; reporting and cooperating with authorities, where appropriate; the remediation of the damage caused; disciplinary measures and modifications to the processes in question and to the internal control systems.

2.9 Disciplinary measures

The proof of violations of Internal and External Rules or omissions in the face of their possible violations, as well as the nonconformities and misconduct identified must be duly treated. Educational and "rehabilitation" measures can be applied in any case, even if the origin is not proven, as a way of preventing and improving the work environment. Whenever necessary, the appropriate penalties should be applied, ranging from warnings to dismissals.

In the case of suppliers, business partners or other related individuals and legal entities, the proven disregard for Cemig's laws, policies and norms and the clauses established in contracts or legal instruments may result in annulment, suspension or termination of the contract, without prejudice to the application of the judicial measures provided for in specific legislation and in the Internal Regulations of Bids and Contracts.

2.10 Guidelines for the Cemig Group

Cemig must exert influence, through appropriate means of governance, so that compliance measures are adopted in the companies of the Cemig Group according to the needs of each subsidiary. The degree of influence exerted by Cemig and the measures are conditioned to the particularities of each company and their relationship with Cemig.

The companies of the Cemig Group must develop activities aimed at ensuring compliance with the legislation and with relevant norms and the ethical conduct of their employees and third parties with whom they relate. The subsidiaries and affiliates of the Cemig Group may have their own compliance programs, *customized according to their activities, or they may follow the guidelines of compliance programs of the Group's or controlling companies.* In any of the alternatives mentioned, the company must always ensure that the activities developed by it are in accordance with the Internal and External Norms in force.

In the development and execution of its *compliance* programs, the degree of formality, the scope of the measures that the organization must take and the volume of resources allocated must be related to the size of the organization, its obligations to stakeholders and the regulation of the sectors in which it operates.

Cemig undertakes, through its representatives and the appropriate corporate governance structures, to always implement the best *compliance* practices in the companies of the Cemig Group and in future ventures.

The managers of the Cemig Group companies have a decisive role in ensuring that this Policy is observed in decisions, in the implementation of compliance structures and activities and *in the consolidation of an organizational culture that encourages ethical conduct and commitment to compliance with the laws throughout the Cemig Group.*

3. DEPLOYMENT AND MONITORING

3.1 Implementation

The *Compliance area* should point out structural and priority measures for the implementation of the Policy and the improvement of the structures and procedures related to it, issuing recommendations to the responsible areas. If the recommendation is not complied with, the responsible area must justify in a substantiated manner the reason for non-compliance.

All Professionals at the Service of Cemig must be committed to the implementation and compliance with the Policy within the scope of their work. The attributions related to the implementation of this Policy must be included in the internal regulations of the other collegiate bodies, and in the rules of the organization of the areas.

For the management of the implementation of the Policy, as well as for the evaluation of its effectiveness, instruments created by external control bodies may be used to evaluate *Cemig's* compliance practices.

The Executive Board shall exercise periodic supervision over the implementation of the *Compliance* Policy in order to ensure its effectiveness, as well as exercise supervision over Cemig's risk management, *compliance* and internal control systems.

3.2 Periodic review and continuous improvement

Periodic evaluations will be conducted:

- at least every 2 (two) years in order to verify the state of implementation of the Policy guidelines, and;
 - at least every 3 (three) years, the effectiveness of the structures and measures related to *compliance* at Cemig.
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The results of these evaluations shall be presented to the Executive Board and the Board of Directors.

At least every three (3) years, this Policy must be reviewed and submitted for further approval. At each revision, its guidelines must be improved in order to ensure continuous improvement, adaptation to Cemig's environment and objectives, as well as the mitigation of the main *compliance risks*.

BOARD OF DIRECTORS

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