ALIANCA

Integrity Program Annual Report

2025

Program Development

2016

Beginning of the Integrity Program implementation process.

2018

Launch of the Ethics and Compliance Hotline and approval, by the Board of Directors, of the policies deemed essential to the Integrity Program.

2020

Enhancement of third-party due diligence processes and governance over donations, sponsorship, and engagement activities.

2022

Development of the Compliance Risk Assessment.

2024

Implementation of the Consequence Management Process.

2025

- Adherence to the Ethos Institute's Business Pact for Integrity and Against Corruption and to the Brazil Integrity Pact of the Office of the Comptroller General (CGU).
- Initiation of the Sanctions Compliance Process.
- Enhancement of the processes for Engagement with Public Officials and Agents, and for Donations, Sponsorship, and Engagement activities.

Message from the Executive Board

"In 2025, we celebrate **the 10th anniversary of Aliança** and reflect with pride on everything we have built and on the values that have guided us since the very beginning. Among these values, **'integrity is non-negotiable'** has always been at the core of our decisions.

In line with the Company's growth, it became necessary to establish practices that embed this value into concrete actions. This gave rise to our Integrity Program, which has evolved over the years to become a cornerstone of our corporate culture. More than a set of policies and procedures, it represents the practical expression of who we are and how we choose to conduct our business: with transparency, respect, and ethics in every decision.
v
The consolidation and maturation of our Program have been pivotal in reaffirming our commitment and ensuring that our growth continues to be supported by the solid values for which we are recognized.

In 2025, we renewed our commitment to act with integrity, fostering an environment of trust, accountability, and pride for everyone who is part of this journey."

Carlos Pavanelli
Chief of Operations and Engineering

Paulo Cruz
Chief Financial and Administrative Officer

Foundations

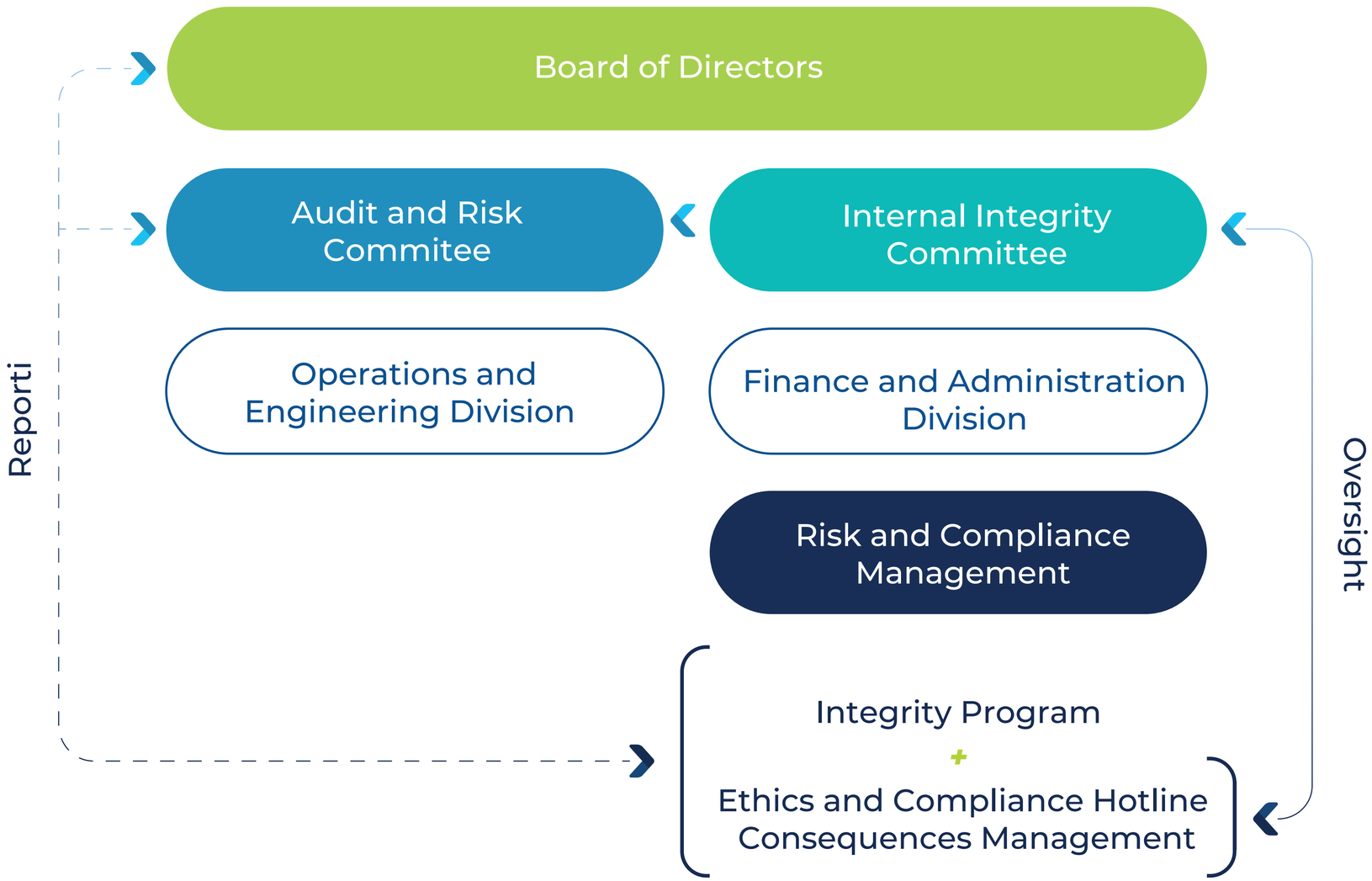
Aliança Energia's Integrity Program is built upon foundations that reinforce ethics, transparency, and trust in all its relationships, and is structured to promote the **prevention, detection**, and **correction** of misconduct and irregularities.

The Program reinforces the organization's responsibility to uphold high standards of integrity. Through ongoing initiatives in improvement, communication, and engagement, it aims to strengthen an ethical culture, ensuring that governance and compliance principles are effectively embedded in the Company's practices and decisions.

Under the coordination of the Compliance Department, Aliança's Integrity Program is supported by the commitment of Senior Management.

Governance

Ensuring independence and transparency, Aliança's **governance structure** provides for the continuous monitoring and oversight of the Integrity Program by the Internal Integrity Committee, the Audit and Risk Committee, and the Board of Directors, thereby ensuring the effectiveness and credibility of the practices embedded.

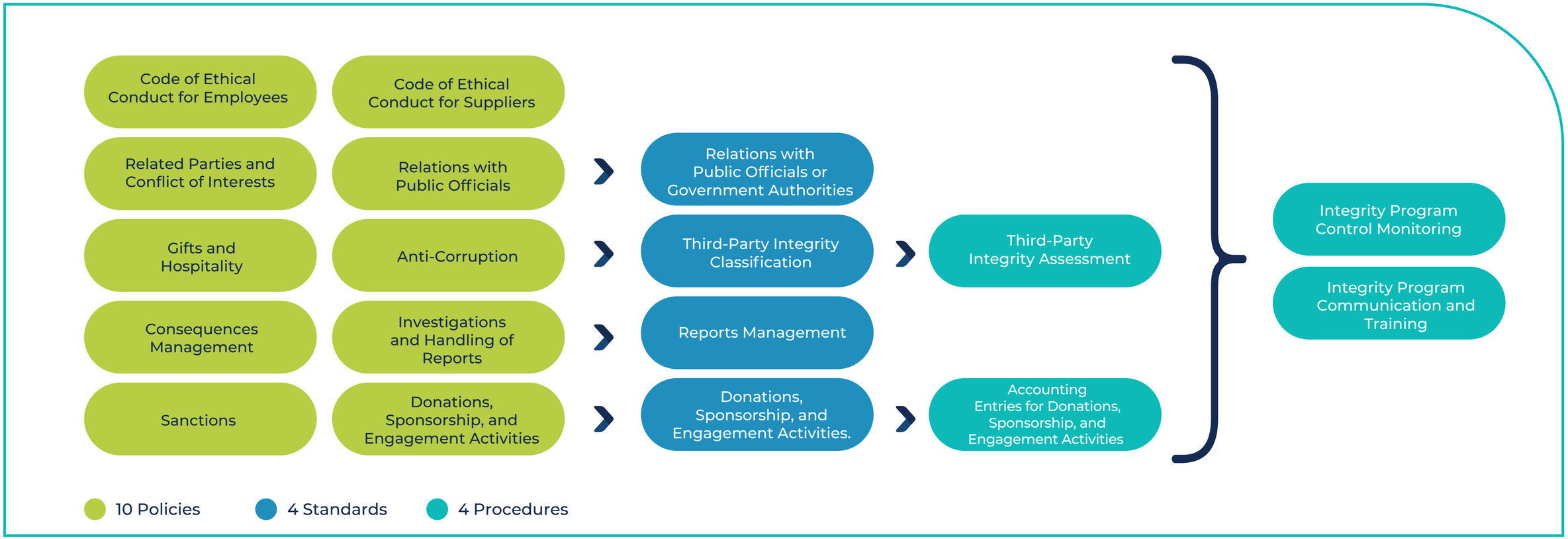


Guidelines

Explore the Policies and Guidelines of Aliança's Integrity Program

Since 2018, Aliança has been developing and updating the Policies, Guidelines, and Procedures that make up its Integrity Program, always aligned with ethical principles, legal requirements, and best governance practices

Aliança reaffirms its objective of embedding its ethical principles into frameworks of integrity and transparency that clearly and precisely establish the expected conduct in the performance of its business activities. Full awareness of and adherence to each of these guidelines are indispensable conditions for consolidating an organizational culture grounded in integrity and transparency.



Communication and Training

Beyond merely disseminating information, Aliança's Integrity Program aims to foster initiatives that actively embed the company's ethical values among its stakeholders. Training, awareness, and refresher initiatives were conducted throughout the year, with content tailored to meet the needs of each audience.

24
Training

81%
Company employees trained on the Code of Conduct

22
Communication Initiatives

11
Newsletter Editions "Integrity Session"

Compliance in Practice

Training sessions designed to address the key guidelines of the Code of Conduct and other frameworks of Aliança's Integrity Program, created by the compliance team to deliver a dynamic and hands-on learning experience.

In 2025, **17** training sessions were conducted, covering the headquarters and Aliança's **7** operational units, reaching a total of **460** employees and third parties. In addition, **3** editions of the training were conducted at the Igarapava and Capim Branco consortia, taking into account the specific characteristics of each project.

Onboarding

The compliance team periodically delivers training sessions to familiarize newly hired employees with the key guidelines of the Employee Code of Conduct, the Integrity Program, and the Ethics and Compliance Hotline.

Integrity Week

Held in April, the event aimed to strengthen employees' and third-parties' understanding of, and alignment with, the guidelines of Aliança's Integrity Program. In addition, a dedicated lecture was held focusing on the prevention and combat of moral and sexual harassment.

Communication and Training

Annual Ethical Perception Survey

A key initiative implemented in 2025 to assess employees' understanding of ethics and integrity topics, gauge the company's needs, and better guide the actions to be carried out by the Compliance team in 2025.

The Annual Ethical Perception Survey was an important guiding tool for Aliança's Integrity Program, particularly regarding the prioritization of communication and training initiatives.

96%

of employees understand that ethics and integrity topics are addressed with importance within the Company.

92%

feel engaged with Aliança's Integrity Program.

86%

feel comfortable reporting unethical behavior or violations of company policies.

86%

believe that the Integrity Program's regulations are consistently followed throughout the company.

Risk Assessment

One of the key cornerstones of Aliança's Integrity Program, **the Compliance Risk Assessment, is conducted annually and tailored to each case through a systematic identification of compliance risks that may impact the company's operations, reputation, and business sustainability.**
This process involves the identification, classification, and prioritization of risks, taking into account factors such as likelihood of occurrence, severity of impact, and areas of greatest exposure.

Based on the assessment results, action plans and appropriate response timelines are defined for each identified risk, in order to ensure timely and effective mitigation of the vulnerabilities detected. Additionally, the risk assessment serves as the foundation for defining preventive and mitigating controls, which are then integrated into the monitoring and oversight plan of the Integrity Program.

This approach allows the company to uphold an ongoing control environment and continuously enhance its integrity practices, thereby reinforcing its commitment to ethics, transparency, and regulatory compliance.

16
Identified Risks

3
Key Risks for 2025

19
Risk Response Plans

Monitoring and Control

The Monitoring and Control function ensures the continuous improvement of, and adherence to, Aliança's Integrity Program, aligning it with internal regulations, applicable legislation, and best practices in governance and compliance.

Its primary purpose is to systematically assess the effectiveness of internal integrity controls, which are subject to annual review by the Compliance team. The review is conducted through the evaluation of the updated compliance risk assessment, the results obtained from the execution of controls carried out in the previous year, and any necessary adjustments identified.

The implementation of monitoring and control enables the identification of compliance gaps, operational vulnerabilities, and emerging risks. This allows for the development of action plans to promptly address necessary corrective measures and continuously enhance processes, thereby fostering a robust control environment and mitigating the company's vulnerabilities.

Monitoring and Control in 2025:

20 Controls

12 Preventive Controls

8 Mitigating Controls

38

Control Activities

Monitoring and Control

2025 KPI's

34
High-Risk Supplier Integrity Assessments.

16
Suppliers flagged for attention.

2
No recommendations.

63
Integrity Assessments of Donations, Sponsorship and Engagement Activities Requests.

30
Entities flagged for attention.

1
No recommendation.

70
Conflict of Interest Assessments.

28
Detected Potential Conflicts of Interest.

4
Conflicts of Interest Requiring Mitigation Plans to Maintain the Integrity of Relationships.

8
Gifts and Hospitality Assessments.

Without Expressing Objections to Offering or Receiving

Ethics and Compliance Hotline

Since 2018, Aliança has maintained its Ethics and Compliance Hotline, a secure and confidential channel for submitting inquiries regarding the Integrity Program or reporting suspected or actual violations of Aliança's principles and guidelines, including corruption, human rights violations, moral or sexual harassment, discrimination, fraud, and other irregularities.

The hotline is managed by an external, specialized company and is available to all Alliance stakeholders. It can be accessed through the website (https://canaldeetica.com.br/aliancaenergia/) or by phone (0800 941 9007), 24 hours a day, 7 days a week

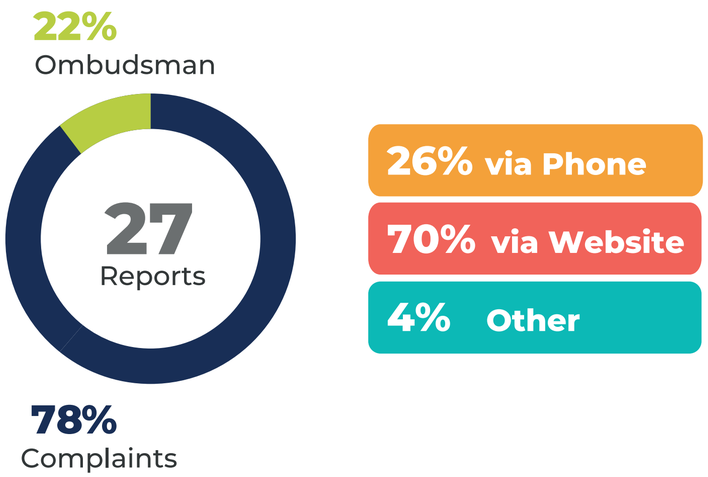
Safeguard

All submissions can be made **anonymously or disclosed**, ensuring **confidentiality**, the **safeguarding of information**, and **protection against any form of retaliation.**

Human-Centered Service

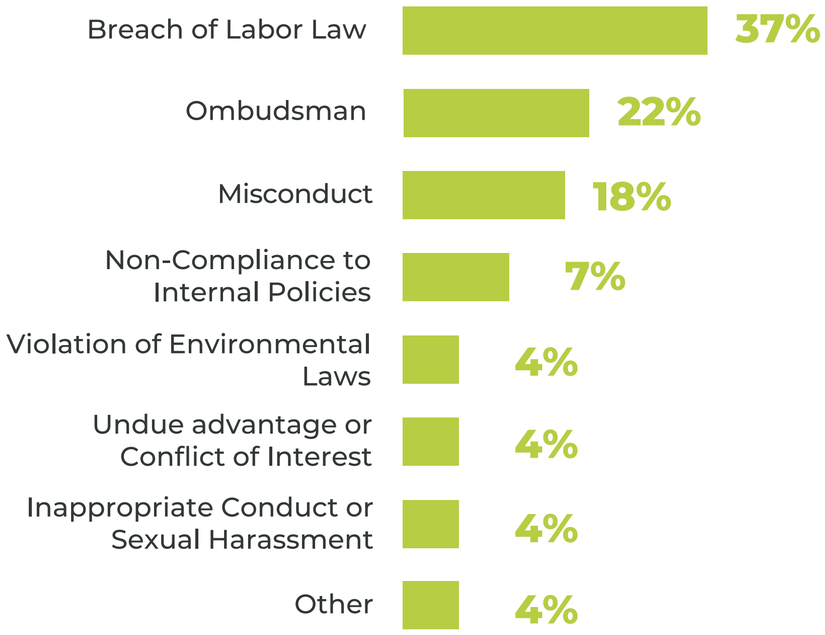
The reporting mechanism enables individuals to indicate a preference for a male or female facilitator when submitting their report. This measure aims to provide greater comfort and support to victims of workplace harassment or sexual harassment.

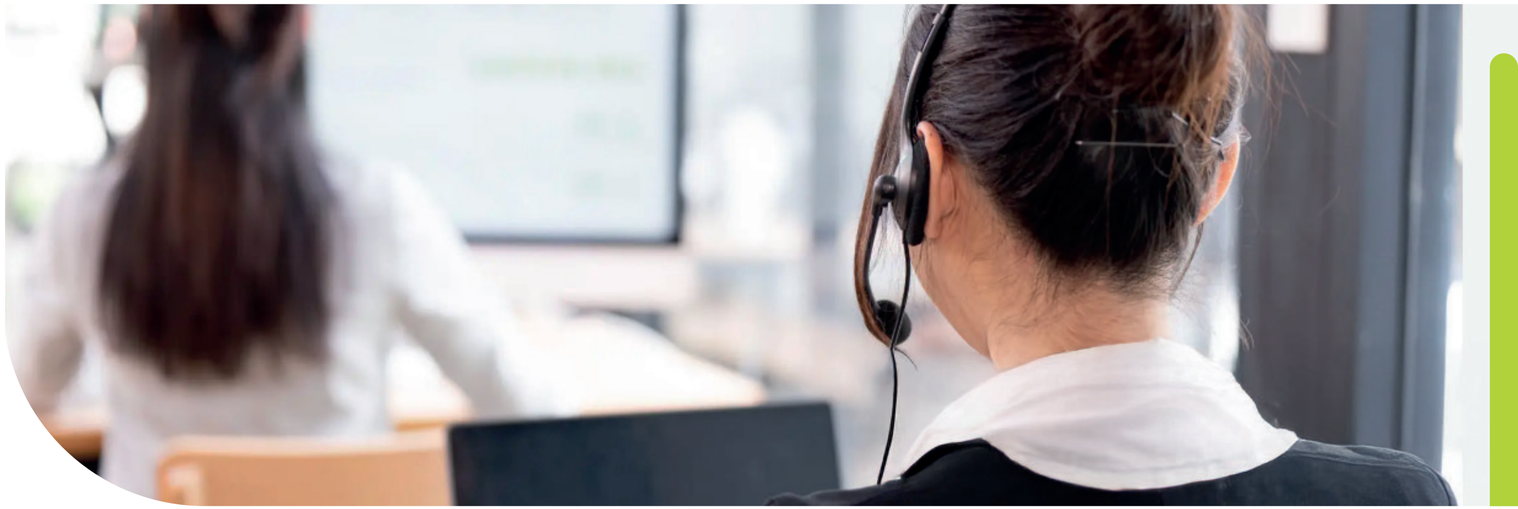
in 2025



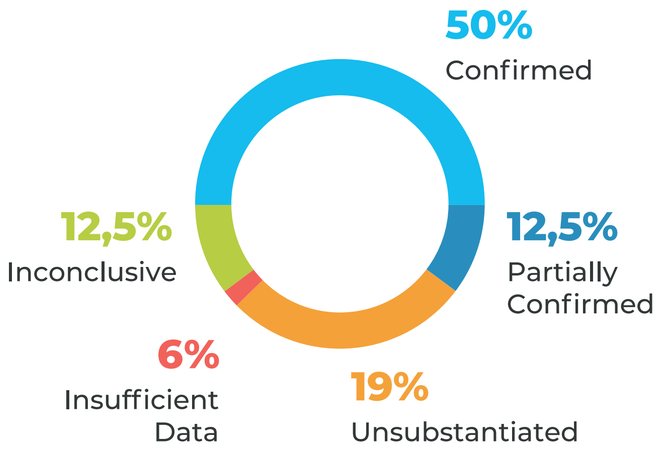
Ethics and Compliance Hotline

Classification

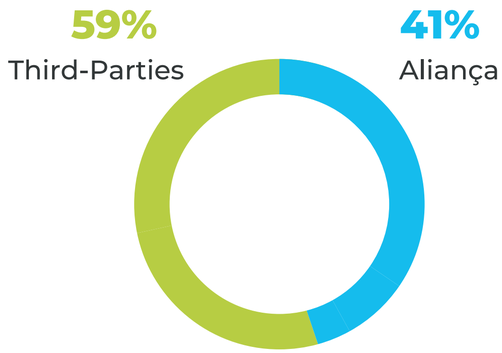




Conclusion of Investigations



Regarding the Individuals Subject to the Reports



Consequence Management

At Aliança, **integrity is expected of everyone.**

In order to ensure equal treatment, proportionality, and progressiveness, Aliança maintains a Consequence Management Policy under which all identified and substantiated misconduct is addressed impartially and consistently.

Misconduct may be identified by employees, managers, or through a report submitted via Aliança's Ethics and Compliance Hotline. Specific guidelines apply to the handling of each case, depending on how the misconduct is identified. In all cases, the immediate manager is primarily accountable for implementing the consequence.

All employees are bound by the Consequence Management Policy, irrespective of their role or hierarchical level, while sanctions stipulated in contractual agreements apply to third-parties.

Integrity Program

Aliança has committed to the Business Pact for Integrity and Against Corruption, promoted by Ethos Institute, and the Brazil Pact for Integrity, promoted by the Office of the Comptroller General (CGU). The company's adherence to these pacts represent significant milestones in consolidating the company's commitment to ethics, transparency, and corporate accountability—fundamental principles for the organizational culture and the reinforcement of the value **Integrity is Non-Negotiable.**

Joining these pacts goes beyond a mere formality: through them, Aliança reaffirms that integrity is non-negotiable and that ethics are at the core of everything we do, whether in daily decision-making or in our relationships with clients, suppliers, and society.

- Adherence to the Integrity Pact - Ethos Institute
- Adherence to the Brazil Pact for Integrity – Office of the Comptroller General (CGU)

Message from the Management

“In 2025, we continued to advance the consolidation of our Integrity Program, reinforcing our ethical culture, enhancing governance and controls, and promoting greater transparency across our processes. The results presented reflect the company’s collective commitment to maintaining an environment that is ethical, secure, and aligned with the best market practices.

More than just numbers, each achievement demonstrates our determination to pursue continuous improvement, fostering trust and credibility with our stakeholders. Corporate Integrity serves as a strategic cornerstone of our business, ensuring that our operations are conducted responsibly transparency, and in strict adherence to ethical principles.

We will remain steadfast in this purpose, expanding initiatives, engaging people, and strengthening mechanisms that ensure an increasingly ethical and promising future for Aliança."

Frederick Nunes

Manager of Risk, Compliance, and Internal Audit

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