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REVIEW/SUPPORT:

Process and Standards Management
Certification Management
Risk Management Directorate
Corporate Governance Directorate

APPROVAL:

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1 INTRODUCTION

1.1 OBJECTIVE

To establish AXIA Energia's strategy for managing processes related to dam safety, maintaining high technical standards and best engineering practices. To ensure standardization, risk management, and a dam safety culture, taking into account best engineering and operational practices, legal requirements, and corporate commitments in the socioeconomic and environmental spheres.

1.2 SCOPE

This policy applies to professionals, managers, executives and board members of AXIA Energia.

2 REFERENCES

2.1 Law No. 12,334, of September 20, 2010 – establishes the National Dam Safety Policy (PNSB) for water accumulation for any use, final or temporary disposal of tailings, and accumulation of industrial waste, creates the National Information System on Dam Safety, and amends the wording of art. 35 of Law No. 9,433, of January 8, 1997, and art. 4 of Law No. 9,984, of July 17, 2000.

2.2 ANEEL Normative Resolution No. 1,064, of May 2, 2023 – establishes safety criteria and actions for dams associated with hydroelectric plants regulated by ANEEL, in accordance with Law No. 12,334, of September 20, 2010.

3 DEFINITIONS

3.1 ACRONYMS

3.1.1 **ANEEL** – National Agency for Electric Energy
3.1.2 **CA -** Board of Directors
3.1.3 **DE -** Executive Board
3.1.4 **PAE** – Emergency Action Plan for Emergencies
3.1.5 **PNSB** – National Dam Safety Policy of Brazil
3.1.6 **PSB** – Dam Safety Plan for Dams
3.1.7 **SPE** – Special Purpose Entity

3.2 CONCEPTS AND DEFINITIONS

3.2.1 **Managing area -** The area responsible for managing and/or executing the process and for corresponding standardization.

3.2.2 **AXIA Energia –** Centrais Elétricas Brasileiras S/A and companies in which it holds direct or indirect corporate control.

3.2.3 **Board of Directors (BD) -** Collegiate body of AXIA Energia responsible for setting the general direction of the company's business, defining its strategic direction, ensuring the proper functioning of governance systems, risk management and internal controls, and ensuring orderly succession of management.

3.2.4 Executive Board (EB) – A collegial body composed of the President and Vice-Presidents, which has specific competencies and authorities granted by the Bylaws and the Board of Directors.

3.2.5 Emergency Action Plan (EAP) – A technical document that is an integral part of the DSP, prepared by the project developer. The EAP establishes the necessary actions in emergency cases and defines the agents to be notified in case of such occurrences. The main objective is to prevent or minimize damage with loss of life and damage to property and downstream communities in case of a potential disaster.

3.2.6 Dam Safety Plan (DSP) – An instrument of the DNSP that is mandatory for implementation by the project developer, composed of various documents, whose objective is to assist in the management of dam safety.

3.2.7 Professional – For purposes of this standard, it is equivalent to the term worker, as described in ISO 45001 – a person who performs work or work-related activities that are under the control of AXIA Energia.

Note 1: People who perform work or work-related activities, according to various procedures, paid or unpaid, such as on a regular or temporary, intermittent or seasonal, casual or part-time basis.
Note 2: The professionals include Administration, people at managerial and non -managerial levels.
Note 3: Work or work-related activities performed under the control of the organization may be carried out by professionals employed by the organization, professionals from external suppliers, contractors, individuals, professionals from agencies, and other persons, to the extent that the organization shares control of their work or work-related activities, according to the context of the organization.

3.2.8 Special Purpose Entity (SPE) – A business entity whose corporate purpose is limited to a single objective, which may be formed with private capital or a combination of public and private capital.

3.2.9 Management System – A set of activities through which the organization identifies its objectives and determines the processes and resources necessary to achieve the desired results.

4 PRINCIPLES

4.1 Preservation of life, the environment, the integrity of people, socioeconomic activities, and AXIA Energia's assets in all processes related to dam safety.

4.2 Acting ethically, with integrity and transparency, considering all parties involved in activities related to dam safety.

4.3 Performance in pursuit of excellence and best practices in engineering and operations, on a continuous basis, in all processes and activities related to dam safety.

4.4 Promotion and maintenance of a prevention culture related to dam safety.

4.5 Promotion of the integration of the dam safety process across all of its assets.

4.6 Assurance of resources and infrastructure necessary for the management of dam safety.

4.7 Consideration of dam safety in the various phases of project development.

4.8 Support for scientific and technological development applied to dam safety.

5 GUIDELINES

5.1 AXIA Energia must:

5.1.1 Act in an integrated manner to standardize procedures, monitoring routines, and indicators related to dam safety across all of its assets.

5.1.2 Promote actions that encourage and maintain a dam safety culture across its assets.

5.1.3 Encourage SPEs in which it has a stake to adopt actions consistent with those presented in this policy.

5.1.4 Ensure that key information related to dam safety permeates the entire company governance.

5.1.5 Secure the budgetary, infrastructure, and personnel resources necessary for the management of dam safety.

5.1.6 Encourage training and promote training programs for staff and third parties directly and indirectly involved with dam safety.

5.1.7 Enable external assessments to be conducted according to criteria indicated in the normative documents derived from this policy.

5.1.8 Create and maintain emergency management committees for dam safety at its projects, according to procedures established in the EAPs.

5.1.9 Honor commitments to compliance with dam safety design criteria in each of its projects.

5.1.10 Consider dam safety risk events in its risk analyses.

5.1.11 Assess, in case of accident, incident, or exceptional event that poses a risk to dam safety, whether there are situations with similar technical characteristics in its other assets, to mitigate the risk of future occurrences of the same nature.

4.1.12 Encourage research and academic activities aimed at improving its processes and technology for diagnosis with a focus on dam safety.

4.1.13 Encourage interaction with public and private agents and other interested parties on matters related to dam safety.

5.1.14 Conduct global *benchmarking* (national and international) to improve and incorporate processes and technologies related to dam safety.

5.1.15 Observe adherence of Dam Safety processes, procedures, and practices to Management Systems and their regulatory requirements, maintaining documented information to the extent necessary.

6 RESPONSIBILITIES

6.1 Area of the *Holding* Responsible for Dam Safety and Reservoirs

6.1.1 Promote the development and updating of this policy and its implementations.

6.1.2 Coordinate the integration of the dam safety process at AXIA Energia.

6.1.3 Act in accordance with the corporate governance process defined by the regulations resulting from this policy.

6.1.4 Monitor the results of the dam safety process at AXIA Energia and coordinate stakeholders in identifying and implementing improvements.

6.1.5 Consolidate and report the results of the dam safety process to the Operational Safety Directorate, the Vice-Presidency of Operations and Safety, the Executive Directorate and the Board of Directors.

6.1.6 Act in mapping corporate risks related to dam safety.

6.2 Director of Operational Safety

6.2.1 Act in accordance with the corporate governance process defined by the regulations resulting from this policy.

6.3 Vice-Presidency of Operations and Security

6.3.1 Act in accordance with the corporate governance process defined by the regulations resulting from this policy.

6.3.2 Promote the development and updating of this policy and its derivatives.

6.4 Executive Board (EB)

6.4.1 Approve this policy and its revisions and ensure its implementation.

6.4.2 Act in accordance with the corporate governance process defined by the regulations resulting from this policy.

6.5 Board of Directors (BD)

6.5.1 Approve this policy and its revisions.

6.5.2 Act in accordance with the corporate governance process defined by the regulations resulting from this policy.

6.6 Risk Management Area

6.6.1 Support the mapping and monitoring of risks related to dam safety.

6.6.2 Coordinate the periodic updating of internal controls and risk factors related to dam safety.

6.7 Internal Audit

6.7.1 Audit compliance with AXIA Energia's internal procedures in actions related to dam safety, including the processes established to meet this policy and its related documents.
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7 GENERAL PROVISIONS

7.1 Exceptions, potential violations, and cases not covered by this policy must be submitted for review by the *holding* area responsible for dam and reservoir safety and forwarded for subsequent approval by the competent bodies.

7.2 Compliance with legal requirements and other applicable requirements must be ensured through the implementation of processes for identifying, evaluating, updating and communicating such requirements to interested parties. In cases of certified Management Systems, proper documented information must be maintained.

7.3 The legal and regulatory provisions related to this subject and the specific legal determinations and agreements in force at the company must be observed.

7.4 This policy may be detailed in other specific regulatory documents, always aligned with the guidelines established here.

7.5 All normative documents and provisions contrary to this policy are hereby revoked, in particular the Dam Safety Policy edition 3.0, approved by Resolution RES-049/2024, of 02/06/2024 and by Deliberation DEL-016/2024, of 02/22/2024.

8 EDITION HISTORY

Edition	Name	Doc. and approval date
1.0	Dam Safety Policy of Eletrobras Companies	RES-067/2020 of 02/10/2020 and DEL-012/2020 of 02/18/2020
2.0	Dam Safety Policy of Eletrobras Companies	RES-595/2021 of 09/13/2021 and DEL-183/2021 of 09/23/2021
3.0	Dam Safety Policy	RES-049/2024 of 02/06/2024 and DEL-016/2024 of 02/22/2024
4.0	Dam Safety	RES-141/2025 of 04/01/2025 and DEL-071/2025 of 04/17/2025
4.1	**Key changes**	
New standardization and adjustment of the regulatory document.		