



# SECURITIES TRADING POLICY OF ISA CTEEP

February/2022

## **I. PURPOSE**

The Securities Trading Policy of ISA CTEEP – Companhia de Transmissão de Energia Elétrica Paulista establishes the criteria and procedures to be observed by the Company and all persons bound by it for the orderly and transparent trading of the securities issued, or those referenced to such securities, ensuring the non-use of insider information that may influence their market price, in accordance with CVM (Securities and Exchange Commission of Brazil) Instruction 44, which replaced CVM Instruction 358/02, with due regard for ISA CTEEP’s Policy for Disclosure of Material Information, approved by the Board of Directors on June 24, 2002.

## **II. PERSONS BOUND BY THE SECURITIES TRADING POLICY**

**II.1.** The following are bound by this Policy:

- a)** ISA CTEEP - Companhia de Transmissão de Energia Elétrica Paulista;
- b)** The direct or indirect controlling shareholders, executive officers, directors and members of the Fiscal Council, Internal Audit Committee, Compensation Committee and any other technical or advisory bodies, whether or not created pursuant to the Bylaws;
- c)** Other employees who, by virtue of their job, function or position in the Company, are aware of material information not disclosed to the general public;

- d)** Individuals and/or legal entities that have trust-based professional or commercial relations with the Company, such as consultants, independent auditors, institutions belonging to the distribution system and any others that have access to material information prior to its disclosure;
- e)** Spouse, partner or family members up to 2<sup>nd</sup> degree, in a direct or collateral line, consanguineous or by affinity, of persons bound by this Policy, as well as companies controlled directly or indirectly by such individuals.

**II.2.** All the persons listed in sub-items “b”, “c” and “d” of item 2.1, except those specified in sub-item 2.2.1, as well as any others that the Company’s administrators deem necessary or appropriate must adhere to this Policy by signing the Statement of Adherence. People who adhere to this Policy must act diligently.

**II.2.1.** Institutions belonging to the distribution system are exempted from signing the Statement of Adherence and must expressly mention in the respective service agreements, clauses on confidentiality and adherence to this Policy.

**II.3.** Administrators who have formalized their departure from the Company prior to the public disclosure of the material fact or event initiated during their tenure remain bound by this Policy for six months from the date of their departure or until the disclosure of said material fact or event, whichever occurs first;

**II.4.** Persons who adhere to this Policy are accountable for any trade against the rules established here, carried out by a family member or company among those listed in sub-item “e”.

## **III. INFORMATION ABOUT TRADING BY ADMINISTRATORS AND RELATED PERSONS**

**III.1.** The executive officers, directors and members of the Fiscal Council, Internal Audit Committee, Compensation Committee and any other technical or advisory bodies, whether or not created pursuant to the Bylaws, must inform the Company, through the Investor Relations department, of the ownership and trades on securities issued by the Company, its parent company and subsidiaries (if publicly-held companies).

**III.2.** Such communication must specify trades involving

derivatives or any other securities referenced to the securities issued by the Company or its parent company or subsidiaries, and must include:

- a) name and identification of the notifier, as well as the individual / corporate taxpayer number (CPF/CNPJ);
- b) number, by type and class, in case of shares, and other characteristics in case of other securities, identification of the issuer and the position held before and after the trade;
- c) the form of acquisition or sale, price and date of the transactions.

**III.3.** The persons listed in item 3.1 must also inform the securities issued by the Company owned by their spouse from whom they are not legally divorced, their partner, any dependent included in their annual income tax return and companies directly or indirectly controlled by them, as well as any trade on these securities.

**III.4.** The communication must be submitted:

- a) within five (5) days after each trade;
- b) on the first business day after taking office.

## **IV. RESTRICTIONS**

**IV.1.** The following practices are forbidden:

- a) providing insider information to third parties for their benefit and use (tipping);
- b) using insider information for one's own benefit (insider trading) by acquiring or selling securities while aware of material information that is not yet public knowledge.

**IV.2.** The Company and persons listed in item 2 are prohibited from trading securities issued by the Company, or those referenced

to such securities, in the following cases:

- a)** from the date of becoming aware of any material fact or event until the date of disclosure of such fact or event to the market, regardless of the assessment about the existence of material information pending disclosure or the intention with regard to trading;
- b)** during the fifteen (15) days prior to the disclosure of quarterly (ITR) and annual financial information (DFP and Reference Form) of the Company, excluding the date of disclosure, but securities may be traded on that date only after said disclosure.

**IV.3.** The Investor Relations Officer may, at their discretion, extend the restrictions set forth in item 4.2 t to beyond the date of disclosure of the material fact or event whenever there is a hypothesis of trade detrimental to the shareholders or the Company.

**IV.4.** The prohibitions established here apply both to trades on the stock exchanges and over-the-counter markets, whether or not organized, and to those carried out without the intervention of an institution belonging to the distribution system.

## V. EXCEPTIONS

The prohibitions set forth in item 4.2 do not apply to:

- a)** trading on fixed income securities, when carried out through transactions with combined commitments to buy the seller and to sell by the buyer, for settlement on a pre-established date, prior to or on the maturity date of the underlying securities to the transaction, with predefined yield or remuneration parameters;
- b)** transactions aimed at meeting obligations undertaken prior to the start of the lockup period

stemming from lending of securities, exercise of call or put options by third parties and forward purchase or sale contracts;

- c) trades by financial institutions and legal entities belonging to its business group, provided these are conducted in the ordinary course of their business and within the parameters established in the Company's trading policy.

## **VI. VIOLATION OF POLICY**

**VI.1.** Breach of the rules established here is a serious violation and subjects the perpetrator to applicable administrative, civil and criminal sanctions and the penalties set forth in article 11 of Federal Law 6,385/76.

**VI.2.** In case of breach by third parties who, by any circumstance, may be aware of material information, such as consultants, independent auditors and analysts of risk rating companies, such breach will be considered a breach of contract and the Company may, without any burden, terminate said agreement and demand the payment of the fine established therein, without prejudice to losses and damages.