 Confidentiality	Document Type:	Procedimento
	Application Area:	Governança Corporativa
	Document Title:	Legal Opinion

## Summary

1. OBJECTIVE .....	Erro! Indicador não definido.
2. APPLICATION SCOPE .....	Erro! Indicador não definido.
3. DEFINITIONS.....	Erro! Indicador não definido.
4. REFERENCE DOCUMENTS .....	Erro! Indicador não definido.
5. RESPONSIBILITIES .....	Erro! Indicador não definido.
6. BASIC RULES.....	Erro! Indicador não definido.
7. RECORDS CONTROL.....	Erro! Indicador não definido.
8. APPENDIX .....	Erro! Indicador não definido.
9. CHANGE LOG .....	Erro! Indicador não definido.

## 1. OBJECTIVE

In order to further reduce the company's operational risks and ensure the company's sustainable and stable development, regarding the Relevant Decisions of Board of Directors, before submitting the subjects for deliberation, the Legal Department- IJ or Corporate Governance Department - IG, as applicable, shall provide Legal Opinions for Board of Directors, after receiving the completed Review Request Form and all the supporting documents from the Business Area.

## 2. APPLICATION SCOPE

**2.1. Company.** This rule is applicable to CPFL Energia S.A. and all its subsidiaries and affiliates

**2.2. Area.** This rule is applicable to all the Business Areas submitting a Relevant Decision to be deliberate by the Board of Directors of CPFL Energia S.A.

## 3. DEFINITIONS

**3.1 Board of Directors** – refers to the Board of Directors of CPFL Energia S.A.


**3.2 Business Area** – is the area of the company that is requesting the Board of Director's deliberation.

**3.3 Legal Opinion** – the opinion rendered by IJ or IG, as applicable, supported by outside lawyers, as deemed necessary. The scope of the opinion will be limited to the legality of the matter to the extent detailed in the Review Request Form submitted to the Board of Directors.

**3.4 Relevant Decisions** – are the matters submitted to the Board of Directors, regarding the following subjects, related to the Company and/or its subsidiaries:

1. The incorporation of companies and amendment to the companies' bylaws (IG);
2. Equity investment (IG);

Document # 18043	Category: Instrução	Version: 1.1	Approved by: Valter Matta	Publication date: 08/09/2021	Page: 1 de 5
---------------------	------------------------	-----------------	------------------------------	---------------------------------	-----------------

 Confidentiality	Document Type:	Procedimento
	Application Area:	Governança Corporativa
	Document Title:	Legal Opinion

3. Fixed asset transfer [acquisition or any other kind of paid or free transfer] (IJ);
4. Corporate restructuring (including changes in the nature of the company, new establishments abroad, mergers, spin-offs, other restructurings) (IG);
5. Company dissolution and liquidation (including bankruptcy etc.) (IG);
6. Transmission and energy auctions (IJ);
7. Issuance of debentures, shares and other securities (IG and IJ);
8. All forms of guarantees offered (IJ);
9. Other matters that the Board considers necessary to issue a Legal Opinion (IG/IJ).

#### 4. REFERENCE DOCUMENTS

- CPFL Energia Bylaws
- CPFL Energia's Board of Directors Internal Regulation
- Corporate Governance Guidelines
- Corporate Law and CVM regulation.

#### 5. RESPONSIBILITIES

**Corporate Governance Department** – will be responsible for (i) the Legal Opinion process; (ii) providing a Legal Opinion, as applicable.

**Business Area** – will be responsible for requesting the Legal Opinion.

**Legal Department** – will be responsible for providing a Legal Opinion, as applicable.

#### 6. BASIC RULES

**6.1. The Business Area shall determine whether the subject is a Relevant Decision or not based on the list abovementioned. If the subject is deemed a Relevant Decision, a Legal Opinion is required.**


The Business Area should then fill out and submit the completed Review Request Form (as described in Annex 1) to Corporate Governance Department that will provide the Legal Opinion or forward the Review Request Form to the Legal Department, depending on the legal nature of the Relevant Decision.

When the Business Area submits the completed Review Request Form, it shall also provide all the supporting documents and evidence.

#### 6.2. Review Request Form and its supporting documents and evidences.

The supporting documents includes: Resolution (when applicable), Review Request Form; the explanation of background, necessity and feasibility description; legal policies, rules and regulations; the opinions and comments of other related business areas involved, and any other materials.

A) For the ordinary Board of Directors meetings, the Business Area shall provide completed Review Request Form and supporting materials together or before submitting the subject to the Board of Executive Officers meeting that will deliberate about the subject. The Review Request

 Confidentiality	Document Type:	Procedimento
	Application Area:	Governança Corporativa
	Document Title:	Legal Opinion

Form shall be upload as a support material in the Jurídico RD system. The absence of the completed Review Request Form may result in the cancellation of the respective RD.

In case the subject in not a matter that shall be deliberated by the Board of executive Officers, the Review Request Form shall be submitted to the Corporate Governance department by e-mail (rcaenergia@cpfl.com.br) within 25 days before the respective Board of Directors meeting.

B) For extraordinary meetings, the Review Request Form shall be submitted with five (5) business day in advance of the respective Board of Directors Meeting.

### 6.3. Legal opinion issued by the Legal Department or Corporate Governance Department

The Legal Department or the Corporate Governance Department shall complete the legality review within 5 working days, after receiving the materials from Business Area.

The Corporate Governance Department or the Legal Department, as applicable, shall forward the Review Request Form with Legal Opinion and other supporting documents to VPI for approval, and issue a Legal Opinion to support the deliberation by Board of Directors.

## 7. RECORDS CONTROL

Identification	Storage and Preservation	Protection (access)	Recovery and use	Retention	disposition
Review Request Form	Internal network (Corporate Governance Department)	Network access	Control sheet	Indefinite period	Not applicable


## 8. APPENDIX

### APPENDIX 1


#### Review Request Form

Business Area : \_\_\_\_\_ Initials: \_\_\_\_\_

Subject for deliberation	
--------------------------	--

 Confidentiality	Document Type:	Procedimento
	Application Area:	Governança Corporativa
	Document Title:	Legal Opinion

Supporting materials	1. 2. 3. .....
Business Area comments:  The submitted resolution is in compliance with all CPFL's internal regulations: <input type="checkbox"/>	
In agreement: _____ Date: ____/____/____  _____ Business Area Director Name: _____ Internal register number: _____	
<b>Corporate Governance Department</b> <input type="checkbox"/> Date of Receipt ____/____/____ <b>Legal Department</b> <input type="checkbox"/> Date of Receipt ____/____/____	
Lawyer responsible for the Legal Opinion: _____ Date: _____ ____/____/____ _____ Name: _____ Internal register number: _____	

 Confidentiality	Document Type:	Procedimento
	Application Area:	Governança Corporativa
	Document Title:	Legal Opinion

Name: _____ Internal register number: _____	
VPI's comments  Date: ____/____/____  VPI Signature and stamp	<input type="checkbox"/> In agreement <input type="checkbox"/> Not in agreement <input type="checkbox"/> Other comments below:

## 9. CHANGE LOG

### 9.1. Employees

Company	Area	Name
CPFL Piratinga	IG – Corporate Governance Department	Ana Cristina Fernandes Borelli

### 9.2. Changes

Previous version	Previous Release Date	Changes from Previous Version
N/A	N/A	Document in initial version.