



edp

Sustainable Supply Chain Report 2022

We Choose Earth



Our Purpose

Our energy

Speaks of our stamina, our track record and what drives us to continuously deliver green energy

and heart

Highlights our people and their key role in delivering our commitment to our clients, partners and communities

drive a better

Reflects our ambition and leadership in making change happen

tomorrow

The reason why we work every day

Contents

2026 Supply Chain Goals

Action Plan 2023

01 Supply Chain Risks and Challenges

- Scope 3 of everything

- EDP's core supply chain

- Challenges faced by EDP

02 Sustainable Supply Chain Management

- The Due Diligence ESG Matrix

- Sustainable purchases ESG Protocol

03 Sustainable Supply Chain Indicators

04 Supply Chain Policies and Procedures

- 04.1 Sustainable Purchasing Policy

- 04.2 Sustainable Supply Chain Protocol

- 04.3 Supplier Code of Conduct

- 04.4 Human and Labor Rights Policy

- 04.5 Supported Industry Initiatives

- 04.6 Health and Safety Policy

- 04.7 Environmental Policy

- 04.8 Personal Data Protection Policy

- 04.9 Integrity Policy

2026 Supply Chain Goals

Engaging our partners for an impactful transformation

Goal 1

All suppliers must pass:

- Integrity and Compliance Due Diligence
- Specific ESG Due Diligence ¹

100%

suppliers compliant
with ESG Due
Diligence

Goal 2

Critical partners must implement management systems and define transparent targets for:

- Decarbonization
- Human and Labor Rights ²
- Circular Economy
- Biodiversity
- Health and Safety

90%

of purchases
volume aligned with
EDP's ESG goals by
2026

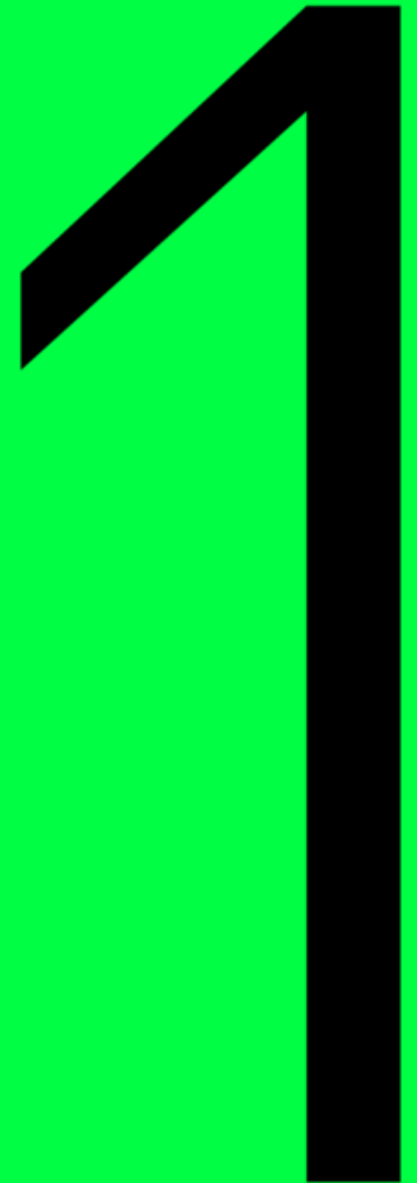
1. Regarding other ESG issues relevant to the contract, through the ESG risk matrix for each purchase category. 2. Includes Diversity

Action plan 2023

Engaging our partners for an impactful transformation

<p>Align suppliers with EDP's goals</p>	<ul style="list-style-type: none"> • Hold the international EDPartners event to promote suppliers' commitments to the renewable and sustainable energy strategy. • Share knowledge through the EDPartners community
<p>Guarantee Human and Labour Rights</p>	<ul style="list-style-type: none"> • Collaborate and support the implementation of certification in Human and Labour Rights • Extend human rights training to meet new legal requirements • Collaborate with suppliers in the creation of risk maps
<p>Promote Transparency and Reporting</p>	<ul style="list-style-type: none"> • Support the publication of sustainability reports, the provision of SpeakUp channels through contractual measures and sharing of experience
<p>Decarbonise the supply chain</p>	<ul style="list-style-type: none"> • Adapt the procurement categories to European taxonomy • Interconnect databases with information on companies' CO₂ emissions, strategies and certificates. • Establish comparability criteria for carbon intensity at the product or service level. • Support the suppliers' decarbonisation journey
<p>Ensure integrity and compliance with the law</p>	<ul style="list-style-type: none"> • Adapt Due Diligence procedures to the specific requirements of the new legislation and to the rules that will be adopted by the business sectors. • Develop and build the capacity of assessments and independent auditors
<p>Promote the circular economy</p>	<ul style="list-style-type: none"> • Promote Environmental Product Declaration (EPD) after life cycle assessment (LCA) following applicable product category rules (PCRs) and ISO 14025 standard. • Collaborate in initiatives that develop product passports dedicated to electrical and electronic equipment
<p>Develop strategic ESG partnerships</p>	<ul style="list-style-type: none"> • Fund and collaborate in Europe's Solar Stewardship Initiative (SSI) project, which aims to set the ESG standard for policy, due diligence and traceability in the photovoltaic sector • Continue to fund and collaborate on the Bettercoal project, which ensures ESG qualification of coal mines • Collaborate with non-governmental organisations and participate in the working groups of corporate associations that promote sustainability in supply chains

Supply Chain Risks and Challenges



Scope 3 of everything

Recent years have seen a profound evolution in the regulatory framework and societal expectations regarding supply chains, with companies now assuming responsibility beyond their direct suppliers and subcontractors and into human and labour rights, integrity, cybersecurity and circularity. Companies should manage their scope 3 with respect to human rights, integrity and environment and not just CO₂. The renewable sector is particularly exposed to this demand because of the hopes for decarbonisation and access to electricity placed in it, and because its supply chain is based on cutting-edge technology, consuming energy and natural resources in a global market that is too concentrated, with numerous supplier layers, and lacking the required transparency. In particular, the photovoltaic and semiconductor sector is one of the most exposed to these demands.

Another challenging year

2022 was marked by Russia's invasion of Ukraine, with economic and humanitarian consequences including rising energy and food costs, and an ever-present climate crisis whose effective mitigation will require global transition to a low-carbon economy. Inflation accelerated in many countries as a result of pandemic-related disruptions combined with consumer demand and higher commodity prices. As a result, economic recovery plans focused on re-industrialisation are emerging simultaneously in the US and the EU, accompanied by increasingly demanding legislative packages for the environment and human rights.

This whole context is increasingly defined by the interaction of complex disruptions with disparate origins and long-term consequences for which organisations in general are not fully prepared, forcing an adaptation of the way risk is managed in this new environment.

In this sense, the concept of resilience, particularly in supply chains, gains relevance, as it is seen as the ability of organisations to cope with adversity, adapt and continuously accelerate as disruptions and crises arise over time.

For an organisation like EDP, present in multiple markets and business areas, supply chains hide interdependencies, potentially leading to crises, where hidden interruptions may arise, unexpectedly impacting the company's business plan.

However, the changes introduced during the COVID-19 pandemic, and more recently with the war in Ukraine, have also represented a new impetus for accelerated growth: the shift to digitalisation, new hybrid working models, rethinking supply chains and accelerating climate change investments. 2022 is therefore representative of the capacity to reinvent and innovate in the face of disruption.

Supply chain – 2022 review

Reporting Directive: the EU has approved new transparency and reporting rules for large companies. The measure will boost comparability between companies and favour procurement processes through the standardisation of indicators.

Due Diligence: in anticipation of the European Due Diligence Directive, companies are already embracing the substance of the law internally, cooperating to define sector standards and audits.

DNSH and minimum safeguards: the concepts of Do No Significant Harm and minimum safeguards have become the letter of the law with the European taxonomy. The funder must assess the negative effects of the projects it is financing on human rights, climate, biodiversity, water and material consumption. Direct and indirect effects.

Scope 3: the SBTi initiative has become the benchmark for assessing decarbonisation trajectory and Scope 3 emissions must be calculated by all companies.

War and monopolies: The invasion of Ukraine and the US-China geopolitical tension have shown the energy imbalance between the powers. The West has decided to accelerate renewable energy and reindustrialisation.

Forced labour: The complicity or alienation of companies in relation to forced and/or unprotected, poorly paid, segregated, repressive labour has become a frequent reason for scrutiny in dialogue between companies and suppliers.

Material scarcity and innovation: Uncertainty about timing, quantities, prices and continuity of access to suppliers is being accompanied by a high level of innovation and diversification in the electricity sector.

EDP's core supply chain

Materiality

EDP's value chain can be understood by segmenting purchases into four types of supply and ESG risks.

Electrical/Industrial technology

EDP does not develop any type of equipment, neither designs nor manufactures it, directly or indirectly. The procurement of equipment is aimed at finished technologies, wholesale, ready to install, which must comply with previously defined technical and sustainability specifications. For each type of technical equipment, the number of manufacturers is small, resulting from prior specifications and requirements.

Technical Services and Construction

Technical and construction services are aimed at local suppliers and include both preparatory work for the installation of infrastructure and the actual installation of equipment and technologies. Often, the same suppliers are responsible for the maintenance work. This type of activity is based on direct service providers and, depending on their expertise, includes subcontracted providers. EDP qualifies not only contractors but also subcontractors.

Corporate Services and IT

Corporate and IT services are developed by service providers under medium/long-term contracts, on an outsourcing basis. These activities have a low level of direct consumption of equipment and energy since they are office extension and local logistics activities. The exception is data storage and management.

Fuels

The last supply segment of the value chain is fossil fuels, which is composed of a small number of suppliers, typically around 10. Coal suppliers, which will remain in the supply portfolio until 2025 at the latest, when EDP will cease the last coal fired power plant; and natural gas suppliers, either through pipelines in the European system or through liquefied gas imported by ship, which will remain in the portfolio until 2030, when EDP will cease all thermal activity.

PURCHASES RISKS AND SEGMENTATION	2022	2021	2020
Electrical/Industrial technology ESG upstream footprint	13%	22%	24%
Technical Services and Construction Waste, Safety, Subcontracting, local impact, ESG upstream footprint	41%	40%	53%
Corporate Services and IT Data Privacy, Cybersecurity, Integrity	16%	18%	14%
Fuels CO ₂ emissions and pollutants, waste, safety, working conditions, upstream ESG footprint	30%	20%	9%



Project development

Construction

Power machinery

Electric technology

IT technology

Maintenance operations

Fuels

Office outsourcing

Challenges faced by EDP

In 2022, overall, EDP worked with 4,199 suppliers and purchased €10,074 million. 97% of the spend was directed to 1,586 suppliers (spend under centralized procurement). Among these, 685 were classified as critical, amounting to 92% of the total spend, or 95% of the spend under centralized procurement. (See section 3 for indicators details)

Compared to the previous year's trend, the EDP's purchase volume increased by 96%, although the number of critical suppliers has declined 15% due to a centralization policy, favourable to the implementation and control of uniform management methodologies.

Such strong spend growth corresponded to the acceleration of the business plan but also reflects price increases in international markets, especially those resulting from the disruption of supply chains. In fact, procurement faced market shortages and sharply rising fossil fuel costs and confronted the difficulties of timely supply of photovoltaic modules, wind, and electrical equipment.

At the same time, procurement met the growing number of EDP investment projects, portfolio realignment and geographical expansion, which required structural organisational measures, including diversification suppliers. Likewise, new and upcoming regulatory changes have required measures to update processes and procedures.

2022 was also a special year regarding the implementation of due diligence to indirect suppliers of the photovoltaic industry, which aimed to ensure the traceability of the origin of the crystalline silicon used in the manufacture of wafers.

Likewise, by participating and supporting initiatives in the renewable sector, EDP has expanded its sphere of action at the international level. The Solar Stewardship Initiative is an example of an industry-led project that aims to ensure respect for human rights throughout supply chains.

Disruption and inflation

Procurement faced market shortages and sharply rising fossil fuel costs and confronted the difficulties of timely supply of photovoltaic modules, wind, and electrical equipment

Accelerating the Business Plan

Procurement met the growing number of EDP investment projects, portfolio realignment and geographical expansion.

Leveraging industry-led initiatives

The Solar Stewardship Initiative is an example of an industry-led project that aims to ensure respect for human rights throughout supply chains

Improving Due Diligence

Due Diligence assessments were improved to support the Business Plan acceleration, portfolio realignment, geographical expansion, and risks.

Traceability

Indirect suppliers of the photovoltaic industry were mapped to ensure the traceability of the origin of the crystalline silicon used in the manufacture of wafers

Sustainable supply chain management



Sustainable supply chain management

Risk identification and mitigation

Through criticality analysis, EDP identifies and segments the potential risks associated with each type of specification. The analysis is carried out using the Sustainability Matrix (EDP Sustainability Protocol), which combines the relevant risks of the activity, identified by consulting stakeholders and attributable to the sector, with the characteristics of the specifications. Based on this tool, 13 dimensions are analysed: financial, business relevance and continuity; dependence and autonomy; access to data; facilities; customers; local communities; cybersecurity; emissions potential; waste; environmental accidents; accidents at work; integrity and compliance; human and labour rights. Once the risks of each type of purchase have been identified, non-negotiable clauses are included in the specifications that establish the minimum qualifications that suppliers must meet, as well as the rules for monitoring execution of the contract. Suppliers that submit proposals only enter the negotiation phase after due diligence of integrity, legal and ethical, financial, technical, social and environmental compliance is carried out.

Through the application of Go/No-go rules in the selection of suppliers and contractual clauses that include monitoring, audits and performance assessment, EDP ensures that it works with low-risk suppliers with skills appropriate to each activity's inherent risks.

Indirect risks and traceability

Through qualification and rules for direct suppliers (scope 1) and subcontractors (scope 2), EDP also leverages the mitigation of indirect risks (scope 3), mainly attributable to upstream activities in the supply chain. However, in the equipment and technology chain the full identification of specific indirect suppliers is unfeasible until an international standard for traceability and origin of materials can be established (see [Action Plan](#)).

Management tools

- Sustainable Purchasing Policy
- Supplier's Code of Conduct
- Sustainability in Purchasing Protocol:
 - Due Diligence
 - Risk analysis
 - Assessments, audits, and annual appraisal
 - Contractual clauses
- Human and Employment Rights Policy
- Climate and Environment Policy
- Prevention and Safety Policy
- Code of Ethics for contractors
- Integrity Policy
- Ethics and Speak Up Channels
- Sustainable Purchasing Committee
- Objectives and KPI policy

Sector tools

- SEIA – Traceability Protocol
- SPE – Solar Stewardship Initiative
- Bettercoal – Code
- ISO 20400

Critical Suppliers

Critical suppliers include all key suppliers for the success of the business plan, as well as suppliers that perform activities that may expose them to ESG risks: occupational accidents, waste, informal subcontracting, access to personal data, etc.

Due Diligence Program (Page 15–16)

EDP systematically scrutinises any evidence of human rights violations that may be related to any counterparty, and especially to the electricity sector and decarbonisation, through a due diligence process on legal compliance, integrity, human and labour rights to counterparties with deals above €25,000. This process results in the exclusion of those who do not guarantee compliance with national and international standards. Additionally, for

the suppliers of the electricity sector's value chain, and according to specific risk maps, there is scrutiny on climatic and environmental issues, on skills and sustainability management practices, financial risks and business continuity, cybersecurity, prevention and safety management, and quality, among others. Once the contractual relationship has been established, where the ESG requirements are converted into contractual clauses, EDP monitors, audits and evaluates the performance of its critical suppliers.

However, the Due Diligence process has been directed at contracted or yet-to-be contracted suppliers. Currently, regarding the relevant sectors for the value chain of the electricity sector, EDP is extending Due Diligence to indirect suppliers. Conducting audits of the suppliers of suppliers is an emerging issue on the international agenda – it requires time, a change in mentality, and collaborative work from companies. EDP is currently working on this issue, discussing with its suppliers exposed to risks, modifying contractual clauses, requesting equivalent commitments and the principle of independent auditing.

In this area, the photovoltaic panels sector is a priority, insofar as it is a strategic technology in EDP's business plan and is exposed to geopolitical conflict, is affected by accusations of forced labour, customs controls, price rises and logistical disruptions, generating significant medium/long term uncertainty.

Believing that extending the practice of due diligence to indirect suppliers depends on companies from each industry sector working together, EDP is a co-founder of the Solar Stewardship Initiative, a Solar Power Europe programme, which has established a code of conduct and auditing principles specific to the solar sector. Auditing of companies, especially those exposed to charges of colluding with forced labour.

Country/sector/product level risks

Country and industry risk assessment is indispensable to pre-identify salient risks that are characteristic or may be present in certain contracts. Through this process the risks specific to each commodity are identified. The pre-identification of risks is a necessarily generic screening tool that must be developed for each concrete case. Depending on this identification, mitigation and contractual control measures must be applied in a specific manner and in accordance with a monitoring plan. For example, a contract that includes access to and management of personal data is riskier the lower the legal and market maturity of each country. But, at the same time, a country with high levels of data protection requirements can expose companies to insufficient procedures.

Valuing ESG criteria in supplier selection

ESG criteria are technical specifications that suppliers must demonstrate they possess to be selected for the negotiation phase. The definition of the required ESG criteria is established on two levels. First, as minimum contractual conditions applicable to any and all purchase contracts. Second, as specific conditions for certain types of contracts, depending on and appropriated to pre-identified risks. These specifications are Go/NoGo criteria. For example, for a contract exposed to occupational accident risks, the supplier must demonstrate the existence of a certified management system, including the qualifications of its employees, and report accident indicators lower than a threshold.

Applying minimum weight to ESG criteria in purchases

Through the Go/NoGo mechanism, based on thresholds, it is guaranteed that the ESG criteria are non-negotiable. However, sometimes, depending on the situation in each market, it is possible that there is a shortage of supply, situations of dependence on certain specific technologies, or poor qualification of suppliers, given the defined ESG thresholds. In this case, the proposals are ordered according to a criteria-by-criteria score and it is necessary to proceed with an approval by exception. For all intents and purposes, through the ESG Matrix, these cases are previously identified. But suppliers are excluded from contracting if they cannot achieve minimum ESG requirements within a set timeframe.

Responsibilities and supplier management

The sustainable purchasing policy, the supplier's code of conduct and the Sustainability protocol are EDP standards whose oversight is attributed to the EDP board of directors. The EBD directly monitors the purchase process and has procurement and contract management structures that implement the policies. A permanent working committee for sustainable purchases ensures that procedures are reviewed, updated and reported, thus assuring a daily management of ESG in the supply chain.

Training and KPIs

EDP's strategic objectives, expressed in the 2026 Business Plan, are deeply dependent on the ESG quality of suppliers, who contribute around 75% to the total value delivered by EDP. Both in terms of reducing scope 3 emissions, as well as developing circularity, respect for human and labor rights, data protection, reducing accidents, and including transparency and traceability, EDP's objectives depend profoundly on the contribution of its suppliers.

The Due Diligence ESG Matrix

Mapping ESG risks – Country / Sector / activity

Criticality

A two-dimensional concept: relevancy to the Business Plan and exposure to risks.

		ESG CRITICALITY MATRIX		
		LOW	MED	HIGH
Business Plan ↑ Exposure to ESG risks ↓	1 Supply category (value chain country/sector/activity level risks)	LOW	MED	HIGH
	2 Purchase amount (EUR)	LOW	MED	HIGH
	3 Duration of the contract and frequency of supplies	LOW	MED	HIGH
	4 Importance for operation, innovation and investment	LOW	MED	HIGH
	5 Consequence of sudden supply interruption	LOW	MED	HIGH
	6 Irreplaceability of suppliers	LOW	MED	HIGH
	7 Supplier access to equipment/facilities	LOW	MED	HIGH
	8 Supplier access to customers	LOW	MED	HIGH
	9 Supplier access to protected personal data	LOW	MED	HIGH
	10 Supplier access to reserved data and Cybersecurity	LOW	MED	HIGH
	11 Risks of occupational accidents from the contracted activity	LOW	MED	HIGH
	12 Environmental risks from the contracted activity	LOW	MED	HIGH
	13 Ethical, human and labour rights of the contracted activity	LOW	MED	HIGH

But achieving the goals, and ensuring that suppliers also adopt ESG objectives that are similar to those of EDP, requires the development of internal sustainability skills and, specifically, those related to the processes and procedures that ensure the objectives.

The internal training process is carried out through conventional training, including participation in specialized international forums, but above all through the participation of the teams in the development of contractual clauses, in the evaluation of the performance of suppliers, in the implementation of audits.

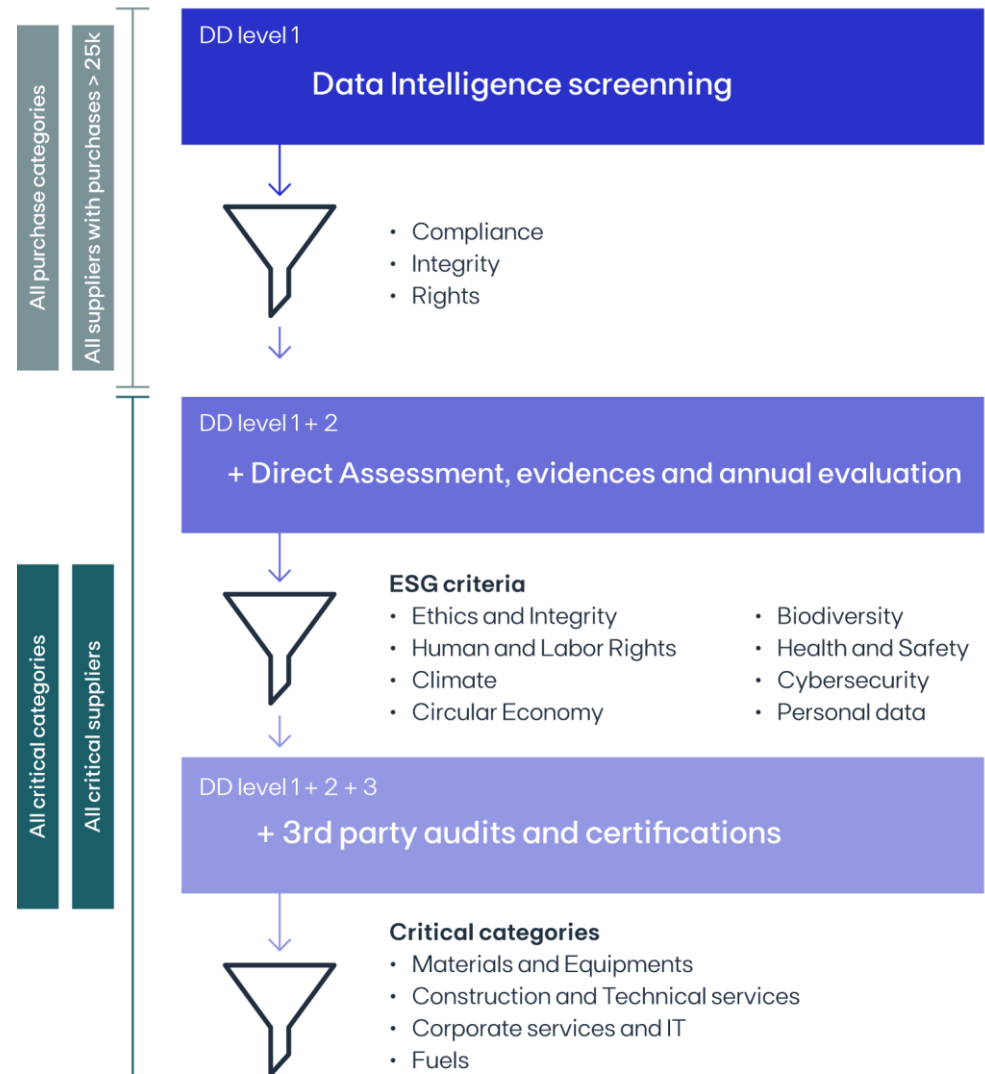
The system of ESG KPIs in the management of sustainable procurement is based on compliance with ESG procedures and is a powerful lever to implement correct risk management and the strategic orientation defined by the 2026 goals.

Engaging suppliers with quality and ESG goals

Through the Due Diligence system implemented by EDP, suppliers are qualified, and, during the contractual relationship, they are monitored through inspections, reports, audits and performance assessment. Depending on the verified performance, EDP proposes to suppliers the development of competences, for example the obtaining of certifications, and improvement programs, whenever the performance results are below expectations. This process is monitored by the contract manager who uses the sustainability team to support suppliers. The holding of workshops with suppliers is a current activity, as well as the sharing of training instruments and the invitation to participate in associations that promote sustainability.

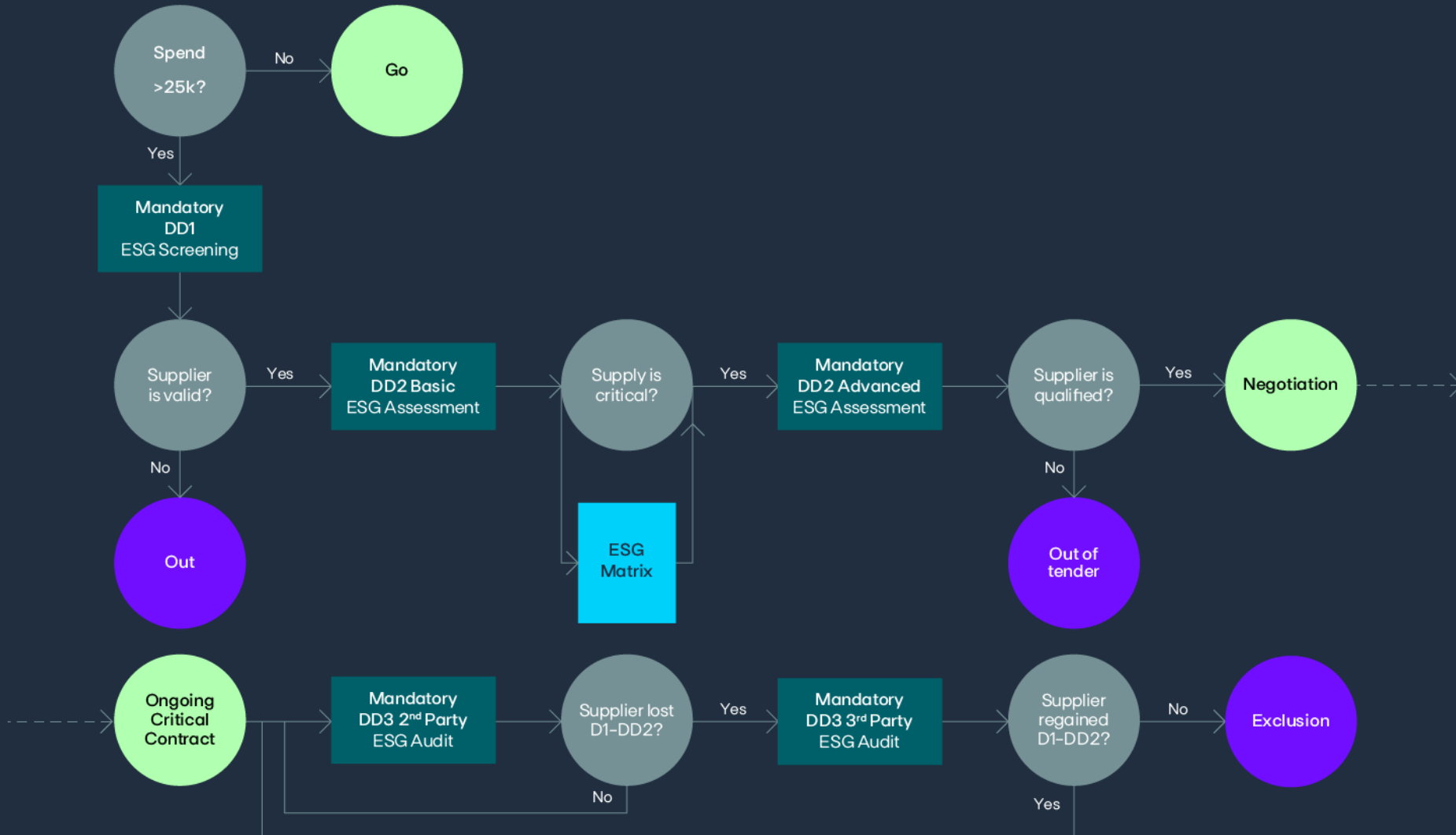
Additionally, EDP invites suppliers to explain their business strategy and ESG 2026 objectives, seeking to promote alignment, share knowledge and provide information on the ESG criteria for selecting suppliers.

EDP has 2026 objectives and targets that require suppliers to be fully aligned with decarbonization, circularity, biodiversity, human, labor and safety rights, data protection, integrity and transparency. (Page 4)



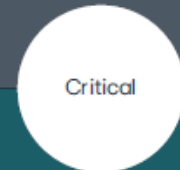
Sustainable purchases ESG protocol

Due Diligence Procedure before negotiation and along contracting period



Sustainable purchases ESG protocol

Due Diligence Layers



Mandatory
DD1
ESG Screening



Supplier Screening – Data intelligence services, including media analytics

Standard

Mandatory
DD2 Basic
ESG Assessment



Supplier Assessment Basic – supplier signs a declaration of compliance with EDP Code of Conduct and informs credentials and quantitative E+S+G information. Procedure is managed by a 3rd party. **Supplier is ESG compliant.**

Critical

ESG
Matrix

Purchase Screening

Supplier will bid a critical tender and must be qualified under strict ESG criteria, in order to prevent the exposure to the potential risk arising from the procured activity. Supplier is ESG compliant, but the procured activity is risky.

Mandatory
DD2 Advanced
ESG Assessment



Supplier Assessment Advanced – supplier is assessed against an advanced questionnaire, specific to the risk of the procured activity. Evidences, face to face and on-site verification. **Supplier is ESG Goal aligned.**

Mandatory
DD3 2nd Party
ESG Audit



Contract Audit – supplier is under monitoring program, including 2nd party audits, reporting, inspections, annual appraisal, DD1 and DD2 update, and improvement program if needed. Purchase Manager is in charge.

Mandatory
DD3 3rd Party
ESG Audit



Supplier Audit – supplier failed expected ESG performance level and is invited to accept 3rd party audits and certificates or termination.



Sustainable supply chain indicators



SUPPLIER MANAGEMENT	UN	2022	2021	2020	2019
SUPPLIERS					
Number of Suppliers by purchase region	#	4,199	13,385	13,185	16,686
Portugal	#	1,052	3,649	3,923	4,200
Spain	#	549	1,421	2,552	1,966
South America	#	1,053	3,749	4,720	4,353
North America	#	357	654	594	763
Rest of the Europe	#	1,381	3,916	1,559	5,404
APAC	#	0	1	0	0
Purchase volume by purchase region	M€	10,074	5,724	4,738	5,391
Portugal	M€	3,003	1,395	965	1,078
Spain	M€	1,500	722	615	1,047
South America	M€	596	887	617	753
North America	M€	3,010	1,268	1,376	1,182
Rest of the Europe	M€	1,965	1,429	1,165	1,331
APAC	M€	0	23	0	0
Local Suppliers volume of purchases					
Portugal	%	27	58	76	92
Spain	%	40	51	58	88
South America	%	99	99	99	99
North America	%	99	100	100	100
Rest of the Europe	%	82	100	45	92
APAC	%	0	0	0	0

Critical Suppliers¹					
ISO 14001 or equivalent	%	81	25	69	82
OHSAS 18001 or equivalent	%	80	36	55	65
Assessed by ESG criteria	%	97	100	100	n.d.
Service providers with audited ESG risks	%	63	45	53	n.d.
Human and labour rights due diligence	%	100	100	100	n.d.

ORIGIN OF FUEL					
Coal Origin					
Colombia	%	58	100	100	76
USA	%	2	0	0	13
South Africa	%	0	0	0	0
Russia (prior to ban)	%	10	0	0	8
Australia	%	3	0	0	0
Kazakhstan	%	27	0	0	0
Ukraine	%	0	0	0	3
Gas Origin					
USA	%	57	81	n.d.	n.d.
Russia	%	0	12	n.d.	n.d.
Equatorial Guinea	%	6	5	n.d.	n.d.

SUPPLIER MANAGEMENT	UN	2022	2021	2020	2019
Nigeria	%	0	2	n.d.	n.d.
Trinidad and Tobago	%	37	0	n.d.	n.d.
PURCHASE CATEGORY					
Materials and Equipment	%	13	22	24	n.d.
Corporate Services and IT	%	16	18	14	n.d.
Construction and technical services	%	41	40	53	n.d.
Fuels	%	31	20	9	n.d.

¹Critical Suppliers exposed to environmental or health and safety risks.

SUPPLIERS UNDER PROCUREMENT	UN	EDP Group	EDP R
2022 Critical Suppliers			
Under Procurement	#	1586	605
Spend Under Procurement	M€	9 809	4 872
Total Critical Tier 1	#	685	194
Critical Business Plan	#	604	194
Critical ESG	#	476	80
Spend with Critical Tier 1	M€	9 298	4 651
Critical ESG Tier 2	#	287	49
2022 Due Diligence to critical Suppliers Tier 1 and Tier 2			
DD Assessments (DD2)	#	1549	325
DD Assessments (DD2) - Goal = 100% of critical suppliers	%	99	95
Need for certificated management systems	#	54	25
Supported in corrective action plan to achieve certifications	#	28	11
Non-compliant suppliers against international covenants	#	0	0

SUPPLIER MANAGEMENT					
CLIMATE CHANGE					
SCOPE 3 emissions					
CO₂ equivalent emissions					
Scope 3 ⁷	ktCO ₂ eq	9,279	10,304	9,595	11,730
Purchased goods and services (C01)	ktCO ₂ eq	713	721	1,116	28
Capital goods (C02)	ktCO ₂ eq	2,935	2,610	1,878	349
Fuel and energy related activities (C03)	ktCO ₂ eq	4,159	5,185	4,131	6,784
Upstream transportation and distribution (C04)	ktCO ₂ eq	6	66	39	611
Waste generated in operations (C05)	ktCO ₂ eq	10	18	11	n.a.
Business travels (C06)	ktCO ₂ eq	9	3	3	7
Commuting (C07)	ktCO ₂ eq	11	12	11	n.a.

SUPPLIER MANAGEMENT	UN	2022	2021	2020	2019
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ETHICS AND COMPLIANCE	UN	2022	2021	2020	2019
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CLAIMS					
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Total claims ¹	#	427	344	464	588
Claims before the Ethics Commission ²	#	321	146	147	150
Client	#	22	10	8	7
Citizen	#	15	20	22	16
Employee	#	153	33	27	25
Supplier	#	26	9	8	2
Anonymous	#	105	74	82	100

HEALTH & SAFETY	UN	2022	2021	2020	2019
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CONTRACTORS					
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Accidents at work ¹	#	105	132	115	82
Fatalities	#	5	7	3	2
Frequency rate ²	Fr	2.18	2.09	2.12	1.84
Severity rate ³	Sr	144	109	100	88

¹Accidents occurred at the place and working time or on a journey, with one or more days of absence and fatal accidents.

²Number of accidents at work in service with absence/fatalities, per million hours worked.

³Number of calendar days lost due to work accident per million hours worked, in the reference period.

2022	UN	GROUP	POR-TUGAL	SPAIN	SOUTH AMER-ICA	NORTH AMER-ICA	REST OF THE EU-ROPE	APAC
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HEALTH AND SAFETY (H&S)								
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Contractors								
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Covered by certification	#	20,689	7,699	2,839	6,215	549	517	0
Covered by certification	%	81	100	100	49	37	99	0
Work-related injuries ⁴								
Recordable work-related injuries	#	161	55	33	64	9	0	0
High-consequence work-related injuries (excluding fatalities)	#	10	5	3	2	0	0	0
Fatal work-related injuries	#	5	3	0	2	0	0	0
Work-related ill health								
Recordable ill health	#	0	0	0	0	0	0	0

2022	UN	GROUP	POR-TUGAL	SPAIN	SOUTH AMER-ICA	NORTH AMER-ICA	REST OF THE EU-ROPE	APAC
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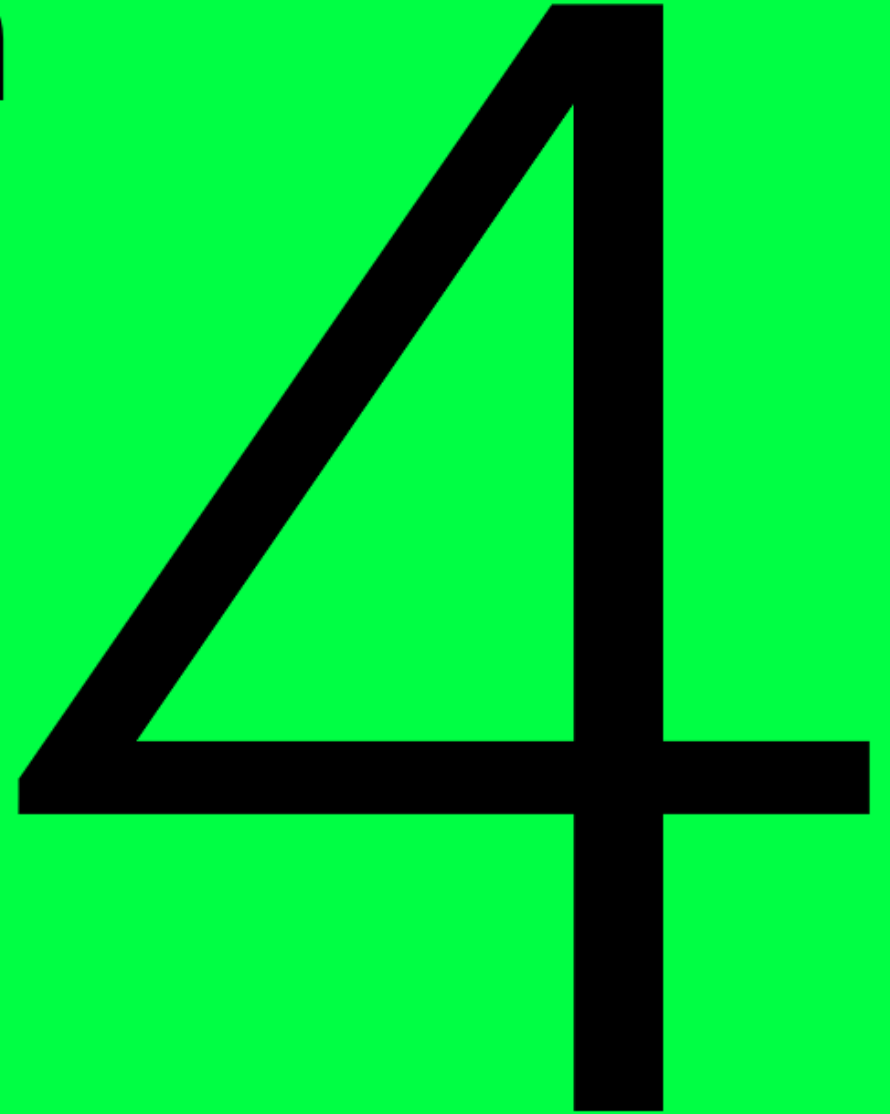
Fatalities as a result of ill health	#	0	0	0	0	0	0	0
Accidents with lost workdays ⁷	#	105	50	23	32	0	0	0
Hours worked	hours	50,470,660	15,213,865	5,609,617	25,063,733	2,933,039	1,030,850	619,556
Rates								
Frequency rate ⁹	Fr	2.18	3.48	4.10	1.36	0.00	0.00	0.00
Severity rate ¹⁰	Sr	144	208	361	79	0	91	0
Overall severity rate ¹¹	oSr	749	1,412	361	566	0	91	0
Work-related injuries ⁵								
Recordable Frequency Rate	RFr	3.19	3.62	5.88	2.55	3.07	0.00	0.00
High consequence Frequency Rate	HFr	0.20	0.33	0.53	0.08	0.00	0.00	0.00
Fatal Frequency Rate	FFr	0.10	0.20	0.00	0.06	0.00	0.00	0.00

H&S TRAINING								
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Contractors								
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Awareness actions	#	9,388	5,880	109	3,194	0	198	7
Employees	#	35,432	24,817	1,171	8,674	0	610	160
Training hours	hours	173,241	50,903	153	120,377	0	180	1,628

Supply chain policies and procedures



EDP Sustainable Purchasing Policy

4.1

EDP

Sustainable Purchasing Policy

1. Compliance with laws and regulations in force and internal governance procedures applicable to the activity of the interested stakeholders;
2. Adoption of a responsible environmental policy that respects the environment by mitigating the adverse impact of the business activities;
3. Equal, transparent and impartial treatment, ensuring advantageous dialogue and respect for the commitments mutually made;
4. Making adequate consultation and communication channels available to all stakeholders;
5. Adopting high moral and ethical standards and acting with integrity, based on the EDP Group Code of Ethics, abstaining from any practices of bribery, corruption, extortion or fraud;
6. Confidentiality of all shared information, ensuring its non-transmission to others and respect between the parties involved;
7. Elimination of conflicts of interest that undermine objectivity and independence in decision-making;
8. Promotion of respect for dignity and human rights and rejection of any form of forced labor or child labor, harassment, discrimination, abuse or other types of physical or psychological violence;
9. Satisfaction of the requirements concerning occupational safety, hygiene and health;
10. Support for the economic development of local communities in which the group operates;
11. Foster continuous improvement, innovation and the sharing of best practices in efficiency, quality of goods or services and the proposal of new market solutions/opportunities.

This policy was approved by the Executive Board of Directors (EBD) on June 1st 2016

EDP

Sustainable Supply Chain Protocol

4.2

EDP Sustainable Supply Chain Protocol

Framework

The Procedures Protocol incorporates the principles of sustainability management set out in the EDP Group's Procurement Manual into decision mechanisms, implementing the ISO 20400 standard, of March 2017.

The assumption of the methodology used is the existence of a stable supplier base, with sustainability gains based on the ongoing improvement of supplier performance, guaranteed by the reinforcement of sustainability criteria in the supply chain, of monitoring, namely through ESG assessments and evaluation of contractual performance.

For the purposes of the previous paragraph, the definition of the Criticality Matrix is essential for the identification of critical supplies to the EDP Group.

This Procedures Protocol establishes management standards that shall be complemented with the following variable criteria:

- During the Licensing/Qualification phase of suppliers, with the application of minimum criteria for the admission of suppliers;
- After assessing the criticality and risk of supply, with the application of adjusted minimum criteria and methodologies.

To the extent that the suppliers to be contracted are exposed to the specific aspects of the respective sector and the activity carried out, an analysis of the risks inherent to the supply shall be carried out in order to establish, as a result of this, sufficient requirements to mitigate them.

In operational terms, the Procedures Protocol establishes 7 (seven) aspects:

- Identification of contractual clauses appropriate to the sustainability risks and requirements;
- Licensing/Qualification of suppliers according to the criticality of the supply;
- Common methodology for establishing Licensing/Qualification requirements;
- Evaluation of the performance of suppliers according to the criticality of the supply;
- Common methodology for evaluating contractual performance;
- Monitoring the undertaking of the most critical contracts;
- Common methodology for using incentives and penalties in contracts.

Definitions

For the purposes of this Procedures Protocol, the terms identified below shall have the following meaning:

Supply – includes supply of goods and provision of services

Supplier Sheet – Repository that brings together all the relevant information about a supplier. This can be found in the EDP Group's supplier Management System.

Licensing/Qualification – Process establishing a list of suppliers qualified to supply goods or provide services to the EDP Group companies, and, as a general rule, the information providing support to the Licensing/Qualification decision comes from the Supplier Registration System.

Criticality Matrix – Methodology used to identify and mitigate the risks associated with this criticality by defining procedures to be considered when contracting and in the carrying out of the contract pursuant to ANNEX A.

Supplier Registration – Process through which any supplier interested in supplying goods or providing services to EDP must provide information regarding its respective activity, competencies and organization, in accordance with the applicable registration level.

Management System – System, generally computerized, that supports the procurement processes and those relating to the management of the contractual relationship.

Purpose and scope of application

1. This Procedures Protocol aims to implement uniform contracting procedures for all EDP Group companies, namely through the application of sustainability criteria in the selection of suppliers and through the respective monitoring of the carrying out of the contract.
2. If the activity in question is subject to a specific law or regulatory rule, namely to the Public Contracts Code, the respective regime must prevail over any provisions incompatible with this Procedures Protocol.

Changes

Regarding the amendments to this Procedures Protocol:

- Annexes A and D may be amended with the agreement of the EBD
- Annexes B and C may be changed whenever the Global Procurement Unit of EDP Global Solutions and the Sustainability Department of the Corporate Center agree to such an amendment.

Transitional Period of Implementation

The implementation of this Procedures Protocol shall be completed by 30 June 2020.

Integrated Supplier Analysis

1. In view of the ongoing improvement of supply chain management and the mitigation of risks associated with contracted activities, this Procedures Policy aims to implement an integrated supplier analysis, in accordance with the policies and objectives of the EDP Group.
2. Integrated supplier analysis consists of the following interconnected procedures:
 - (i) Licensing/Qualification of suppliers;
 - (ii) Environment, Social and Governance Assessments (ESG);
 - (iii) Evaluation of contractual performance.
3. The results of the integrated supplier analysis are used to:
 - (i) Document contractual performance;
 - (ii) Optimize market analysis in the search for suppliers to consult;
 - (iii) Characterize suppliers in consultation processes;
 - (iv) Identify the risks in hiring and ensuring the respective mitigation;
 - (v) Identify opportunities for supplier development and ongoing improvement in supply chain management;
 - (vi) Analyze the aggregated performance of suppliers.

Implementation Steps

Requirements of the Sustainability Protocol; 1. Criticality Analysis; 2. Performance monitoring plan; 3. Supplier qualification; 4. Contracting; 5. Evaluation of Supplier Performance; 6. ESG audits; 7. Due Diligence & Integrity; Procurement; Need; Market analysis; Consultation; Proposals; Analysis of proposals; Negotiation; Adjudication; Contracting; Contract management

Criticality Analysis

1. Criticality Analysis is the procedure by which critical aspects are identified, as well as the risks of a certain supply which must be taken care of through Licensing/Qualification requirements, adapted contractual clauses and a Monitoring Plan for the carrying out of the contract.

2. The Criticality Analysis is done in relation to consideration of the supply itself and not in relation to the supplier, and it is necessary to:

(i) Identify minimum requirements for the Licensing/Qualification of suppliers, in order to ensure that those chosen have the necessary skills and have implemented sufficient best practices to mitigate the supply risk in relation to their respective criticality;

(ii) During the period of the contract, protect against any business continuity and reputational negative occurrences through the inclusion of adapted contractual clauses;

(iii) Outline Monitoring Plans for contracted suppliers in order to prevent and eliminate the occurrence of negative events.

3. The Licensing/Qualification requirements, the adaptation of contractual clauses and the Monitoring Plans must always be specifically defined when medium or high risks are identified.

4. The Criticality Analysis shall be subject to the principle of proportionality, that is, the risk mitigation measures must be proportionate to the specific risks and not to the general risks.

5. The Criticality Analysis is based on accumulated experience, and it is important to consider the following criteria:

(i) Probability of occurrence of the critical event(s) and the risk(s) identified;

(ii) Impact for business continuity;

(iii) Reputational impact for the EDP Group.

6. For methodology purposes, all supplies that have at least one criterion with a “High Risk” assessment are considered critical.

7. Whenever the purchase specifications are drawn up, the Business Unit must carry out the Criticality Analysis by completing the respective Criticality Matrix, according to the following scale: (i) Low Risk, (ii) Medium Risk or (iii) High risk.

8. In order to guarantee harmonized assessment, the assessor should take into account the scoring grid prepared for this purpose and available in ANNEX A.

CRITICALITY CRITERIA	RISK AS- SESSMENT	MITIGATION STRATEGY		
		Require- ments	Protect	Monitor
1 Supply Category		Spend category		
2 Purchase Amount (EUR)		Spend		
3 Duration of the contract and frequency of supplies				
4 Importance for operation, innovation and investment				
5 Consequence of sudden supply inter- ruption				
6 Irreplaceability of suppliers				
7 Supplier access to equipment/facilities				
8 Supplier access to customers				
9 Supplier access to protected personal data				
10 Supplier access to reserved data				
11 Risks of occupational accidents from the contracted activity				
12 Environmental risks from the contracted activity				
13 Ethical, human and labor rights of the contracted activity				

9. Whenever the criteria are scored with Medium Risk, it will be necessary to specify Licensing/Qualification requirements and include adapted contractual protection clauses.
10. Whenever the criteria are scored with High Risk, it will be necessary, in addition to that specified in the previous paragraph, to establish a Monitoring plan for carrying out the Contract.
11. As an example, filling in the Criticality Matrix shall result in the following forms:
12. In the specific case of supplies of energy sources, namely gas or coal, the respective contracts shall always be classified as being highly critical, taking into account the following assessment and risk criteria:
13. The minimum requirements referred to in the preceding point shall also include three complementary obligations:
 - (i) Certified environmental management system, according to ISO 14001 or later;
 - (ii) Certified prevention and safety management system, according to OHSAS 18001 or ISO 45001;
 - (iii) Compliance with the Bettercoal Code, or equivalent, for coal purchases.
14. Monitoring of contractual performance is also mandatory for supplies of energy sources.

Supplier Licensing/Qualification

1. The Licensing/Qualification of suppliers is the process through which a list of licensed/qualified suppliers of goods or services to EDP Group companies is established according to the supply for which the suppliers were identified.
2. As a general rule, the Licensing/Qualification must be a phase prior to the consultation procedure, as the list of suppliers to be invited for the consultation procedures must be a result of the prior assessment of their respective profile and skills in order to ensure that all suppliers comply with the minimum necessary requirements.

3. Suppliers will be considered licensed/qualified whenever they meet the minimum requirements, which cut across all categories of supply, as well as specific requirements, determined due to the assessment of criticality and the technical requirements for the supply.
4. Specific requirements, whether technical or relating to sustainability, must be defined in the specification of the need for each purchase.
5. Compliance with the specific requirements referred to in the preceding paragraph may be assessed at a consultation stage and after submission of the respective proposal.

Supplier Licensing/Qualification Requirements

1. The Licensing/Qualification of the supplier will be dependent on:
 - (i) Registration score after answering the Licensing/Qualification Requirements Questionnaire according to the model provided for in ANNEX B, regarding consultation and performance requirements in terms of environmental, safety, legal, ethical and human and labor rights compliance criteria, through registration in the EDP Group's Supplier Management System available at www.edp.com;
 - (ii) Verification and compliance with the provisions of OS 03/2010/EBD, of 17 May, and the Regulation on Conflicts of Interest and Business between EDP's Related Parties or any other internal applicable regulation at all times, on this matter;
 - (iii) Absence of litigation with EDP, which shall be assessed with the support of the Corporate Center's Legal Advisory Department;
 - (iv) Knowledge of the General Conditions for the Acquisition of Goods and Services (except energy) of the EDP Group and of the Supplier Code of Conduct, even though exceptions may be agreed during the consultation procedure;
 - (v) Absence of debts to the Social Security, the Tax Authority or to workers, namely overdue wages;
 - (vi) Solvency, with positive net worth;

(vii) Not having obtained a grade lower than 40%, in at least one of the aspects of contractual performance evaluation and/or ESG assessments in the previous year, if it has been an active supplier in the period in question.

2. Except when suppliers are duly registered in the EDP Group's Supplier Management System or when they are not registered but have been instructed to submit the respective responses along with the proposal, suppliers' responses to the Licensing/Qualification Requirements Questionnaire shall be previously evaluated, given that:

(i) Failure to deliver a response to the Questionnaire implies that the supplier is not licensed/qualified as a supplier and, consequently, its proposal may be considered invalid, by the Global Procurement Unit (UPG), in agreement with the Business Unit, and for the purposes of the negotiation under tender;

(ii) The inaccuracy of relevant information, provided by the supplier, may result in the exclusion of the latter from the consultation procedure, by the UPG, in agreement with the Business Unit;

(iii) The inaccuracy of relevant information, provided by the supplier, found after adjudication, must be communicated immediately to the Corporate Center's Legal Advisory Department;

(iv) Occasional shortcomings detected in the responses to the Licensing/Qualification Questionnaire must be notified to the supplier for clarification;

(v) Suppliers with requirements below the minimum required may be excluded from the consultation.

3. When preparing the specification of the need for a purchase, the Business Unit shall include, in the documentation, the obligation for the supplier to comply with the admission conditions, including the completion of the Licensing/Qualification Requirements Questionnaire:

(i) If the supplier is registered in the EDP Group's Corporate Supplier Management System, the supplier will ensure that its respective data are up to date; otherwise, the supplier must update the information available in that system;

(ii) If the consultation includes requirements not foreseen in the Supplier Management System, the Business Unit shall develop a supplementary questionnaire in order to guarantee coverage of all the minimum requirements, with the said questionnaire being able to establish qualitative and quantitative requirements.

Contracting

1. The contract to be signed must be adapted to ensure the protection and monitoring of the criticality matrix of the identified supply.

2. Without prejudice to the previous paragraph, the information resulting from the Supplier Licensing/Qualification Requirements Questionnaire must be considered for the purpose of drawing up the respective contract, namely with the introduction of contractual clauses adapted to the risks identified.

3. The structure and typology of contracts must evolve in order to promote the standardization of the respective clauses.

Monitoring the carrying out of the Contract

1. Whenever a criterion is identified as High Risk (Critical), the Business Unit must prepare a Monitoring Plan for carrying out the Contract in relation to the respective criterion, which can be shared with the supplier.

2. The Monitoring Plan for carrying out the Contract drawn up and monitored by the Business Unit:

a. Should include the following elements:

- The identification of the contract manager, types and frequency of monitoring;

b. It may also include (among other aspects):

- Periodic report provided by the supplier;

- Inquiries, inspections and surprise surveys regarding the supplier and/or planned audits;
- Consequences of deviations from contractual targets and Licensing/Qualification requirements.

3. The results of the monitoring actions shall be consolidated and used to:

- (i) Apply corrective actions and promote improvement plans;
- (ii) Communicate incidents and non-conformities to line management;
- (iii) Support the assessment evaluation of contractual performance.

4. As a result of an audit or inspection, the contract manager will assess the need to suspend the supplier's work whenever there is non-compliance or a high risk of legal or contractual non-compliance is identified, including the terms of the Supplier Code of Conduct.

5. In particular, whenever the reason for suspending work is due to non-compliance, or a high risk of non-compliance, of provisions relating to ethical duties, human rights, labor rights, environmental damage or circumstances that jeopardize the safety of human life, the contract manager must immediately and directly report this situation to the Board of Directors of the respective Business Unit.

Evaluation of Contractual Performance

1. During the carrying out of the contract, the performance of suppliers must be assessed in accordance with the EDP Group's Assessment Model.

2. The assessment model shall take into account the following aspects:

- (i) Execution and Management;
- (ii) Ethics, Human and Labor Rights;

(iii) Prevention and Safety*;

(iv) Environment*.

* If applicable

3. Each aspect is scored from 1 to 100, according to the model provided in ANNEX C.

4. The aspects (i) Execution and Management and (ii) Ethics, Human and Labor Rights must always be considered.

5. If the activity has an impact on the aspects (iii) Environment and (iv) Prevention and Safety, then these aspects must be evaluated.

6. The Business Unit or an entity designated for the purpose, shall assess evaluate the performance of the supplier by filling in the Assessment Questionnaire defined for the purpose.

7. If shorter periods are not established by the Business Units, the assessment evaluation takes place:

- (i) Upon the conclusion of the contracted supplies;
- (ii) Once a year, for multi-annual contracts.

8. If applicable, the documents used to support the Assessment Evaluation must be attached to the reply response to the Assessment Evaluation Questionnaire.

9. The result of the Assessment Evaluation must be included in the Supplier' Sheet.

10. Access to the Assessment Evaluation results is restricted to the manager responsible for the assessment evaluation and responsible for the area as well as the Supplier Relationship Management areaarea of relations with suppliers, and the result may also be made available to:

- (i) The supplier whose contract has been assessed evaluated;
- (ii) EDP employees operating within supply chain management.

11. The Contractual Performance Assessment Evaluation Questionnaire must be published in accordance with the model provided for in ANNEX C.
12. The result of the Contractual Performance Assessment Evaluation shall be composed of the score for each of the contractual aspects assessed/evaluated.

Environmental, Social and Governance Assessment (ESG)

1. The ESG assessment aims to categorize suppliers, and in this way provide for mitigation of the implicit business risk and explicitly address fundamental sustainability issues.
2. The ESG assessment must result in the identification and analysis of non-conformities and/or opportunities for improvement that ensure the commitment of suppliers to the themes of corporate sustainability, namely human rights, governance, social responsibility, prevention and security, labor and environment relations and rights.
3. ESG assessments are normally pre-announced. However, whenever there are reports of anomalous situations or, as a result of an unacceptable level of risk, these may occur in an unannounced manner.
4. As a result of the ESG assessment, a report is submitted to suppliers with all the identified findings and a plan for corrective and, if applicable, improvement actions, with a view to developing a cycle of ongoing improvement.
5. If, as a result of an assessment that identifies a non-conformity, an action plan is established, this must specify an implementation deadline in the shortest possible time.

Annual Report

1. The Sustainability Department and the Global Procurement Unit shall prepare an Annual Report on sustainability in the Supply Chain, submitting it to the Sustainability Committee.

2. As an example, the following can be considered as chapters of the Annual Report:

- (i) Global and specific performance and definition of KPIs;
- (ii) Changes in Policies, Procedures and Organization;
- (iii) Improvements in services and information systems;
- (iv) Supplier training, assessment and interaction results;
- (v) Transfer of best practices and innovation;
- (vi) Collaborative sustainability development activities;
- (vii) Internal training program;
- (viii) Audit program;
- (ix) Supply chain analysis, trends and benchmarking.

3. The Annual Report shall include an autonomous chapter on the improvement plan which may, among other aspects, specify the following actions:

- (i) Definition of objectives, indicators and targets;
- (ii) Identification of resources and attribution of responsibilities;
- (iii) Alignment with the EDP Group's Sustainability objectives.

ANNEX A – Criticality Score Matrix

ANNEX B – Licensing/Qualification Requirements Questionnaire

ANNEX C – Contractual Performance Assessment Evaluation Questionnaire

ANNEX D – Responsibility Matrix

EDP

Supplier Code of Conduct

4.3

EDP Supplier Code of Conduct

The EDP Supplier Code of Conduct applies to entities that supply or intend to supply goods and services to any of the EDP Group companies (hereafter “Supplier” or “Suppliers”), which is deemed to be the group of companies in a control or group relationship with EDP, regardless of whether their headquarters are in Portugal or another country.

Approval and compliance with the Code of Conduct is a contractual obligation. It is a binding annex of the bidding documents for EDP Group procurement as well as in contracts for the supply of services or sale of goods, to be signed by the supplier and any EDP Group company. The contracts to be signed by the EDP Group and Suppliers shall envisage that in case of serious or systematic breach of this code, the EDP Group may terminate the contractual relationship.

This Code of Conduct does not establish commitments contrary to existing law, regulations or current contractual provisions, nor does it add or derogate from new rights. Its provisions and standards are supplementary in nature.

Suppliers should promote the adoption of sustainability policies in procurement and make the best efforts to ensure that levels of demand equivalent to those of this Code are also respected in their own supply chains.

Suppliers of the EDP Group agree to the following commitments, taking as reference the principle of highest demand:

Compliance commitments

Comply with national and international legislation in force that is applicable within the scope of the existing contractual relationship with the EDP Group, namely the laws, regulations, the operational, technical and sectoral rules and regulations, on matters such as: processing and protection of personal data, combating corruption, separation of activities in the sector, anti-trust, environment, health and safety, intellectual property rights, as well as the contractual arrangements established with the EDP Group companies.

Not to pursue, permit, consent to or collude with any activity, practice or conduct likely to constitute or appear to be an act of bribery and/or corruption, criminally punishable under applicable law. Also, to institute procedures and implement necessary and appropriate measures aimed at preventing their occurrence.

Respect internationally accepted corporate principles, values and best practices in matters concerning human rights, labor rights, workplace safety and health, prevention and combating corruption, and having measures in place to prohibit the practice of anti-trust acts or acts seeking to restrict competition in the market.

Ethical commitments

Promote and respect the highest ethical, moral and human integrity standards, in particular the principles enshrined in the EDP Group Code of Ethics.

Respect the principles and commitments with customers and communities, whenever acting on behalf of the EDP Group, working in their facilities or using their information.

Inform, through the Ethics Ombudsman or other EDP Group Ethics channels, of the existence of potential conflicts of interests in relations with the EDP Group, whether of a business or personal nature.

Refrain from offering gifts, goods or free services, or coerce or restrict EDP Group employees in any way to influence their business dealings with the EDP Group.

Truthfully and accurately convey information concerning management practices.

Environmental commitments

Comply with national legislation and international standards for environmental protection, and obtain the environmental certifications required for their business activities.

Identify, monitor and mitigate the environmental risks and impacts of their activities, products, materials and means of transport, promoting continuous improvement and conserving the environment.

Promote the continuous streamlining of the consumption of energy and natural resources and the reduction of emissions and waste generated by the business activity.

Comply with the EDP Group's environmental requirements when acting on EDP Group premises or facilities or acting on behalf of the EDP Group.

Labor commitments

Respect freedom of association and the collective bargaining of their workers, establishing mechanisms of dialogue free from any reprisals or discrimination.

Ensure and promote the respect for free labor, based on fair and transparent contracts for workers, refusing to use and be complicit with forced labor, unjustified restrictions on free movement, misappropriation of documents and remuneration and human trafficking.

Respect diversity, promoting equality and non-discrimination based on race, age, gender and sexual or marital orientation, ethnic or national origin, name, disability, pregnancy, religion, politics, cultural or trade union orientation. Respecting also any other conditions that may be defined by contract or protected by applicable law.

Ensure adequate remuneration to workers, in accordance with current legislation and collective labor agreements, when applicable, which shall be paid on time, respecting the minimum wages established in each country, paying overtime and other compensation, social security contributions and taxes that are due.

Ensure compliance with current labor legislation and collective labor agreements, when applicable, regarding the maximum normal and supplementary working hours, as well as the rest periods and rest days.

Prevent any form of child labor, under national regulations and ILO 138 of the International Labor Organization.

Establish disciplinary measures and procedures in accordance with the laws and international conventions, publicizing the standards and ensuring the hearing and defense by those accused of disciplinary breaches, and preventing in all cases any intimidation, verbal or physical abuse or aggression, or any other type of moral or physical harassment.

Workplace Safety and Health commitments

Comply with national legislation and international standards in force on workplace safety and health, as well as the EDP Safety Policy and the specific certifications required, observing the

precautionary principle in all activities, promoting responsibility and the awareness of everyone involved.

Identify, monitor and record all risks associated with their activity and specific work tasks, establishing prevention, reduction and continuous improvement measures.

Train the workers and equip them with the means and equipment for their personal protection, ensuring they have adequate working conditions.

Define accident management and emergency preparation measures appropriate to the type of activity, location and circumstances.

Comply with the EDP Group's Safety and Health requirements when acting on EDP Group premises or facilities or acting on behalf of the EDP Group.

Community and Human Rights commitments

Promote the consultation, respect and protection of human rights, the dignity of people and privacy of each individual, of the communities on which the business activities impact in their area of influence.

Ensure that all business activities are conducted without recourse to violence or abuse and reject and refuse any complicity with human rights violations.

Management commitments

Adopt management procedures that permit compliance with this Code to be monitored. There is an obligation to report any serious breaches to EDP and to provide evidence of compliance when requested by EDP.

Ensure that all persons employed, regardless of the nature of the legal relationship, comply with the provisions of this Code of Conduct and are informed, qualified and competent to perform their duties in accordance with its terms.

Executive Board of Directors, May 2017

EDP

Human and Labor Rights Policy

4.4

EDP

Human and Labor Rights Policy

A – Purpose and scope

1. SUBSTANTIATION

In 2003 the EDP Group subscribed to the United Nations Global Compact, the following year approved its Sustainable Development Principles and, in 2005, published the first edition of the Code of Ethics. No longer than 2006, the EDP Group established a new business strategy setting the priority to renewable energy investment. In 2021, the EDP Group reinforced its growth and internationalization strategy, assuming the “All Green by 2030” ambition and enlarged international recognition, for its ethical excellence and deep respecting of human and labor rights in all dimensions of its activity.

Since the founding years of the internationalization and decarbonization strategy, the Code of Ethics has been updated and revised enabling the organization to face new challenges and risks, tackling the contemporary social transformation, and, in the same way, several policies were published, orienting specific themes, developing the principles established in the Code of Ethics. In this sense, in 2017, the Declaration of Respect for Human and Labor Rights was approved, committing to the United Nations Guiding Principles on Business and Human Rights, including the development of risk maps, deeper reporting on human and labor rights management, enhanced internal procedures, particularly in supply chain management.

Now, taking the strengthening of the internationalization strategy through investment in renewable energy and the revision of the EDP Group’s Code of Ethics, carried out in September 2020, it became necessary to update related policies and procedures, namely the specific policy of respect for Human and Labor Rights.

Accordingly, and informed by international references, listening to stakeholders, the complaints system and the media, the Executive Board of Directors (EBD) decided to update the EDP Group’s Declaration of Respect for Human and Labor Rights Policy (article 14–a), transforming it into the Human and Labor Rights Policy, on July 2021, as follows.

2. OBJECTIVE

The Human and Labor Rights Policy aims to ensure respect for Human and Labor Rights in the EDP Group’s sphere of activity, implementing the commitments defined in its policies, specifying the international reference treaties and standards and establishing the procedures that ensure compliance with them.

3. SCOPE

The Policy applies to all EDP Group companies and employees, business relationship and activities, in all its geographic locations, regardless of the local practices or level of social and economic development.

In implementing the Policy, the EDP Group respects national legislation and international treaties and standards according to the stringent standards. The Policy is in force even though national law may not transpose the international treaties and standards.

B – Internal and external references

4. EDP’s REFERENCES

This Policy develops and implements the principles of respect for human and labor rights established in the following EDP fundamental policies:

- i. Code of Ethics
- ii. Stakeholder Relationship Policy
- iii. Supplier Code of Conduct

5. INTERNATIONAL STANDARDS AND DIRECTIVES

This Policy transposes to EDP’s sphere of activity the human and labor rights commitments and procedures defined by international standards and directives, namely:

- i. United Nations Global Compact
- ii. United Nations Guiding Principles on Business and Human Rights

- iii. OECD Due Diligence Guidance for Responsible Business Conduct
- iv. Directive of the European Parliament and of the Council on Corporate Due Diligence and Corporate Accountability

6. INTERNATIONAL TREATIES AND CONVENTIONS

The Policy sets out for the EDP Group’s sphere of activity its commitment to respect all internationally recognized human and labor rights, namely:

Within the scope of the United Nations Organization:

- i. “International Bill of Human Rights”, including:
 - ii. Universal Declaration of Human Rights, 1948
 - iii. International Covenant on Civil and Political Rights, 1966
 - iv. International Covenant on Economic, Social and Cultural Rights, 1966

Instruments to protect vulnerable people and groups, including:

- i. International Convention on the Elimination of All Forms of Racial Discrimination (1965)
- ii. Convention on the Elimination of All Forms of Discrimination against Women, 1979
- iii. Convention on the Rights of the Child, 1989
- iv. International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, 1990
- v. Convention on the Rights of Persons with Disabilities, 2006
- vi. Declaration on the Rights of Indigenous Peoples, 2007

Within the scope of the International Labor Organization (ILO):

- i. Eight Fundamental Principles and Rights at Work and related conventions, including:
 - i. Freedom of Association and Protection of the Right to Organize Convention, (No.87), and the Right to Organize and Collective Bargaining Convention, (No.98)
 - ii. The elimination of all forms of forced or compulsory labor (Conventions 29 and 105)
 - iii. The effective abolition of child labor (Conventions 138 and 182)
 - iv. The elimination of discrimination in relation to employment and occupation (Conventions 100 and 111)
 - v. Respect Labor Standards on Working time (Conventions 1, 14 and 106)
 - vi. Protection of Occupational Health and Safety (Conventions 155 and 187, Protocol 2002)
 - vii. The guarantee of payment of a minimum wage (2008 ILO Declaration on Social Justice for a Fair Globalization).
 - viii. Understanding the Indigenous and Tribal Peoples Convention, 1989 (No. 169)
 - ii. The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy regarding the principles and conventions not included in the eight Fundamental Principles and Rights at Work where applicable.

C – Description and responsibilities

7. STRATEGIC COMMITMENTS

The EDP Group is committed to respecting and enforcing all internationally recognized human and labor rights, identified in article 6. This commitment means:

Support the International Bill of Human Rights, subscribe to and implement the Principles of the Global Compact and the instruments to protect vulnerable people and groups.

Apply the ILO Declaration on Fundamental Principles and Rights at Work and related conventions and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

Operate a human and labor rights management system that is active and present in all its activities, implementing the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and the Directive of the European Parliament and of the Council on Corporate Due Diligence and Corporate Accountability.

8. ACTION PRINCIPLES

The EDP Group implements its strategic commitments to respect all internationally recognized human and labor rights, identified in article 6, through the application of the following action principles:

- a) Identify, prevent and monitor the risks related to human and labor rights that are salient in its sector of activity, developing and keeping a Human and Labor Rights Risk Map up to date.
- b) Guarantee it will not be complicit in human and labor rights abuses or disrespect.
- c) Recognize as stakeholders: workers and their families, local communities, and any other person or group of people whose lives and environment may be influenced by EDP's activities, including their legitimate representatives, labor unions, social or environmental organizations.
- d) Engage constructively with its stakeholders, especially those affected or likely to be affected by its activities, incorporating their views and concerns within business decisions and the development of its approach to human and labor rights.
- e) Avoid adverse impacts that may arise from business operations or relationships, ensuring remediation in the event of their occurrence and undertaking not to retaliate against accusations, and cooperating in initiatives that promote access to remediation through legitimate judicial or non-judicial mechanisms.
- f) Ensure the proper functioning of a system to report occurrences and make complaints, with a guarantee of confidentiality and non-retaliation.

- g) Communicate and report with transparency its approach to human and labor rights, identifying risks and impacts, mitigation, compensation and remediation measures taken and the results of such actions.
- h) Extend the same commitments to its business partnerships and suppliers, working towards to extend these same commitments to their supply chains and their partnerships.
- i) Work with its partners and suppliers to mitigate adverse impacts that are directly linked to its operations, products or services through its own mechanisms or through cooperation in the development of third-party non-judicial solutions.

9. ASSIGNMENTS

To ensure effective management of respect for Human and Labor Rights established in this Policy, the EDP Group:

- a) Establishes the Human Rights Working Committee, chaired by a director of the EBD, managed by the corporate director responsible for Human and Labor Rights, and made up of the corporate directors with assigned responsibilities in the area of this policy, that is, ethics, sustainability, compliance, legal, auditing, management and labor relations, procurement and supplier management, prevention and safety, risk, and stakeholder management.
- b) Assigns a corporate senior director to the strategic and operational management of the Policy implementation, that assumes direct responsibility to the EBD.

10. HUMAN RIGHTS WORKING COMMITTEE

The Human Rights Working Committee works closely together with the Policy director, giving statements on issues to be submitted to the EBD and ensuring consistency of the procedures across all departments and business units. The duties of the Human Rights Working Committee are:

- a) Assess the Annual Report and the Improvement Plan, prepared by the Human and Labor Rights corporate director, submitting it to the EBD.
- b) Analyze impact assessment and due diligence procedures.

- c) Consider and contribute to the salient Human and Labor Rights Risk Map.
- d) Advice on the development of performance indicators and provide an opinion on external assessments related to Human and Labor Rights.
- e) Analyze negative occurrences relating to Human and Labor Rights and the measures taken.
- f) Consider matters submitted to it by the corporate director of Human and Labor Rights.

11. OPERATIONAL PROCEDURES

Policy implementation in field activities is ensured through the adoption of operational procedures that include, in particular:

- a) Adopting a risk mapping methodology involving the ongoing updating and quality control of the risk map and salient impacts on human rights related to the EDP Group’s activities, informed by international references, by proactive listening to stakeholders, by the complaints system and by the media.
- b) Carrying out and publishing human rights impact assessments (HRIA) or environmental and social impact assessments (ESIA) covering human and labor rights, prepared by independent third parties, whenever substantial infrastructure projects or closures are undertaken, or when entering new businesses or geographies.
- c) Communicating human and labor rights to its target audiences in an accessible and appropriate manner, especially to affected stakeholders who raise issues, providing quality information to assess the appropriateness of the response(s), in a way that does not pose risks to stakeholders or affected personnel.
- d) Applying human and labor rights criteria when establishing investment partnerships, implementing a Due Diligence system ensuring the United Nations Guiding Principles on Business and Human Rights, as well as the OECD Guidelines for Multinational Enterprises.

- e) Applying requirements for assessment, contracting, training, auditing, and exclusion of suppliers regarding human and labor rights practices. Specially for supply chains that are internationally recognized as being at risk, suppliers shall be bound to the following obligations:
 - i. The obligation to provide complaint channels or mechanisms (proprietary, third-party, or shared).
 - ii. The obligation to apply conflict minerals regulations and ensure import minerals and metals come from responsible sources.
 - iii. The obligation to certify contractors that provides infrastructure security.
 - iv. The application of a Human and Labor Rights Policy and a Due Diligence system implementing the United Nations Guiding Principles on Business and Human Rights, as well as the OECD Guidelines for Multinational Enterprises.

12. ETHICS CHANNEL

The Ethics Channel is accessible to all individuals, workers and citizens, and communities or organizations, that may be adversely impacted by the company or, irrespective of this, that wish to complain, denounce, clarify or expose any situation, i.e. those related to human and labor rights.

13. COMMUNICATION

The communication of this Policy is carried out on a permanent basis, as follows:

- a) Published on the corporate website and intranet, as well on the institutional websites of the business units.
- b) Communicated, explained, and explicitly made known to and acknowledged by the employees.
- c) Integrated within the training plans on Ethics, with special attention given to decision-makers and managers and the salient issues of human and labor rights.

- d) Included in the EDP Group's business relationships with other companies, namely suppliers, equity stakes and joint ventures.
- e) Published in the body of the annual report on Human and Labor Rights and disclosed together with the other policies of the EDP Group.

D - Final provisions

14. ENTRY INTO FORCE

- a) This Policy replaces the Declaration of Respect for Human and Labor Rights approved in May 2017.
- b) The Policy is effective from the date of its approval and for an indefinite period, and may be updated or revised, by deliberation of the EBD.
- c) The EDP Group companies are responsible, within the scope of their action, to implement the necessary procedures and actions for the correct implementation of the Policy.
- d) The internal standards and procedures impacted by the Policy should be updated to incorporate and ensure their full implementation and periodic updating.

15. ETHICS CHANNEL CONTACT

As of today, the Ethics Channel is available on the Internet at:

<https://www.edp.com/en/about-us/speak-up>

<https://www.edpr.com/en/speak-up>

<https://www.contatoseguro.com.br/edpbrasil>

Executive Board of Directors

July 2021

EDP

Supported Industry Initiatives

4.5

Working together

Leveraging Human Rights for a sustainable power sector

EDP actively participates in the activities of business associations that promote human rights and sustainability. Working in cooperation allows us to address challenges that an isolated company does not have the leverage to do.

In addition to the joint publication of position papers, EDP works in association with companies in the renewable sector to develop standards, audits, codes of conduct, traceability and transparency mechanisms that ensure respect for human rights.

Solar Energy Industries Association (SEIA)

Solar Industry Forced Labor Prevention Pledge

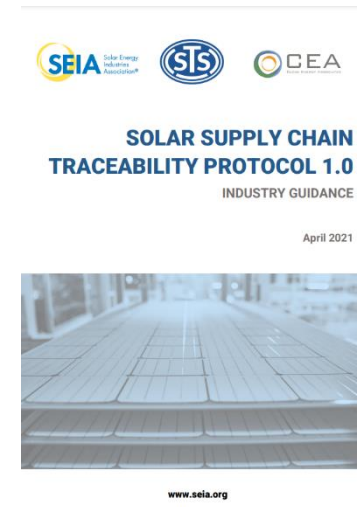
[Link source](#)

Solar Industry Forced Labor Prevention Pledge We, the undersigned companies and organizations, state our firm opposition to the use of forced labor within the solar supply chain. We hereby commit to helping ensure that the solar supply chain is free of forced labor and raising awareness within the industry on this important issue. To assist in these efforts, we support the development of an **industry-led solar supply chain traceability protocol** as a tool for identifying the source of primary raw materials and inputs and tracking their incorporation into finished products, including solar modules.

As of 2023 February, more than 340 companies have signed this Pledge.

The SEIA Traceability Protocol

[Link source](#)



The SEIA Traceability Protocol (Protocol) lays out a series of steps that a manufacturer can take to track the origin of material inputs through specified stage(s) of production, processing, and distribution, e.g., the factory location and production date of polysilicon used in a finished solar module. The Protocol aims at helping capture and making transparently available to stakeholders which companies and facilities participated in the manufacturing of renewable energy products on the market.

It is worth noting that the Protocol itself does not seek to determine other features of the product, such as product quality. Rather, it aims to equip stakeholders with trustworthy and transparent information about the supply chain.

For each “step” or “link” within the supply chain, the Protocol requires that certain information about the material inputs used within each production step is conveyed to the next step of the production process. In the event a step in the process includes multiple sources of materials, the Protocol asks for the producer to track which products use which input material and, if necessary, to segregate input materials.

In a robust implementation of the Protocol, a supplier could show the provenance of, for example, polysilicon used in a crystalline silicon photovoltaic module. This information can be used, for example, to address inquiries from U.S. Customs and Border Protection (“CBP”) or customers regarding the source of material inputs.

The Protocol also recognizes that strong organizational controls must be in place to ensure compliance and, in turn, confidence in a supplier's claims. Examples of such controls include:

- Independent, third-party audits applied to internal processes and third-party suppliers;
- Corporate social responsibility codes of conduct;
- Security measures to safeguard information and prevent tampering of goods;
- Due diligence and monitoring of suppliers;
- Compliance programs;
- Trainings of employees; and
- Enforcement of policies and procedures along with corrective action plans.

Role of Manufacturers in the Application of the Protocol
Manufacturers along the supply chain are responsible for implementing the Protocol.

Solar Power Europe

Statement on Forced Labor

[Link source](#)

We strongly condemn the use of forced labour, and any such abuse of human rights, and are committed to investigating reports related to forced labour in the solar supply chain in China's Xinjiang region, in order to better understand the context and production dynamic. We take these reports very seriously, and as a sector that strives for the highest standard of sustainability, we remain vigilant across our supply chain in meeting global human rights standards.

We urge our members to respect the labour and human rights standards outlined in the ILO Declaration on Fundamental Principles and Rights at Work or the UN Global Compact, and to abide by existing guidelines and standards on sustainability practices, including labour practices, across the supply chain; such as the OECD Due Diligence Guidance for Responsible Mineral Supply Chains, or the UN Guiding Principles on Business and Human Rights. As for other European sectors impacted, this brings attention to the importance of increasing the transparency of global supply chains. We are actively contributing to the work of the European Union in this regard, in particular on corporate governance, draft EU Taxonomy rules, and the public procurement framework. We are looking forward to further cooperation with the EU and national governments, and count on their support in addressing human rights violations.

In parallel, we have been working with our members to improve supply chain transparency and due diligence policies, as well as the development of a Solar Sustainability Best Practices Benchmark, with the aim of producing industry standards for improved traceability and full disclosure of environmental and social aspects in the supply chain to ensure that the solar sector remains a champion of sustainability. Our goal of diversifying the solar supply chain means that we strongly support the strengthening of an EU solar industrial base to improve Europe's position in the supply chain, while remaining integrated in an open, global market for solar and other sustainable technologies.

Solar Stewardship Initiative

<https://solarstewardshipinitiative.org/>



The Solar Stewardship Initiative (SSI) was set in motion by SolarPower Europe and Solar Energy UK in March 2021, as part of a programme established in 2015 to promote responsible production

in the solar value chain.

The Solar Stewardship Initiative works collaboratively with manufacturers, developers, installers and purchasers across the global solar value chain to foster responsible production, sourcing and stewardship of materials.

Over 50 organisations are behind the Initiative, which has the support of the International Finance Corporation (World Bank Group) and the European Investment Bank.

The official launch of the SSI in September 2022 marks a critical milestone for the solar industry.

Through our strategic Roadmap and Code the SSI puts into practice the shared commitment of over 50 companies to ensure the integrity of their supply chains and improve ESG performance. The Solar Stewardship Initiative has developed a consultation version* of the

SSI Code relevant to the solar value chain based on internationally recognised standards, certifications and guidelines, including:

The United Nations Guiding Principles on Business and Human Rights (UNGPs)

United Nations Global Compact (UNGC)

OECD Due Diligence Guidance for Responsible Business Conduct

International Labour Organisation (ILO) Conventions

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

WRI/WBCSD Greenhouse Gas Protocol

ISO 14001:2015 Environmental Management systems

ISO 14044:2006 Life cycle assessment

By adopting this Code, companies in the solar value chain demonstrate a clear commitment to ethical and transparent practices in each area.

The Solar Stewardship Initiative's ambition is to enhance transparency, sustainable development and responsible production in the solar supply chain. Hearing from and incorporating the views and perspectives of stakeholders is key to the success of the Solar Stewardship Initiative.

The Consultation Version of the SSI Code will be subject to a public consultation planned for mid2023. The development of and revisions to the Code are informed by international good practice guidance, including ISEAL Code of Good Practice for Standard Setting.

The Solar Stewardship Initiative Assurance System will recognise existing credible and equivalent third-party standards systems, reporting frameworks, and certifications in order to avoid redundancy, audit fatigue, and to promote the use of such programmes.

The criteria, process and timeline for recognising and determining levels of alignment of third-party sustainability standards systems with the SSI Code are under development and will be made public in the beginning of 2023. Our supporters have been implementing a range of sustainability standards and frameworks in their own value chains. As a starting point, the following sustainability standards systems, which are currently implemented by our supporters, are being assessed for recognition by and alignment with the SSI Code.

[Aluminium Stewardship Initiative Performance Standard](#)

[Amfori BSCI Code of Conduct](#)

[CDP \(for GHG\)](#)

[ETI Base Code](#)

[ISO 20400 Sustainable Procurement](#)

[ISO 37001: Anti-bribery management system](#)

[ISO 14001: Environmental management system](#)

[ISO 45001: Health and safety management system](#)

[Responsible Business Alliance Code of Conduct](#)

[ResponsibleSteel Standard](#)

[SA8000: Social Accountability standard](#)

[Together for Sustainability](#)

Wind Europe

Industry Principles for Supply Chain Sustainability

[Link source](#)

[Link source](#)

In 2108, Wind Europe approved the Industry Principles for Supply Chain Sustainability, a document that establishes a Code of Conduct for companies in the wind energy sector and incorporates recommendations from the United Nations and the OECD. After five years, the document remains valid in all its instances. Human rights are covered on the following sections:

Due Diligence and Transparency

Non-discrimination and Harassment

Disciplinary Measures

Modern Slavery

Child Labor

Working Hours, Wages & Benefits

Freedom of Association & Collective Bargaining

Grievance Channels and Remediation Mechanisms

Health & Safety in the Workplace

Hazardous Materials

Operating in Conflict-affected Areas

Sourcing Conflict Minerals
Community Engagement & Development

Bettercoal

Bettercoal Code

<https://www.bettercoal.org/>



[Link source](#)

[Link source](#)

Companies that want to ensure the coal they purchase is produced to the highest international standards, join Bettercoal as Members.

Bettercoal and its Members work to encourage increasing numbers of coal producers, from across the globe, to commit to the Bettercoal Code and so increase the network of businesses working towards a global, responsible coal supply chain:

PRINCIPLE 01 Business Integrity
PRINCIPLE 02 Policy and Management
PRINCIPLE 03 Transparency
PRINCIPLE 04 Mine Rehabilitation and Closure
PRINCIPLE 05 Human Rights
PRINCIPLE 06 Labour Rights
PRINCIPLE 07 Occupational Health and Safety (OHS)

PRINCIPLE 08 Communities and Stakeholders
PRINCIPLE 09 Water Stewardship
PRINCIPLE 10 Management of Emissions and Waste
PRINCIPLE 11 Greenhouse Gas Emissions
PRINCIPLE 12 Biodiversity and Land Use

Continuous improvement

Continuous Improvement is key to the way that Bettercoal works. This is embodied in the Continuous Improvement Plan (CIP) framework. Every coal producer in the Bettercoal network commits to a site assessment against the Bettercoal Code by an independent, third-party assessor, and the development of a CIP to ensure progress in meeting the provisions of the Code.

Bettercoal Producers have committed to improving their Environmental, Social, and Governance (ESG) performance by assessing their operations against the 144 provisions of the Bettercoal Code. Each producer undergoes an independent, on-site mine assessment to assess how closely they meet the requirements of our Standard. Based on the assessment findings, actionable tasks / goals are set into a tailored Continuous Improvement Plan (CIP). This CIP supports the producer in working towards alignment with the 144 provisions of our Standard.

Once the CIP is in place, the producer now officially becomes a Bettercoal Producer. They then regularly submit information to the assessors, to evidence the changes they are implementing in order to meet their CIP goals. Assessors verify whether changes meet the expectations of our Standard. In some cases, on-site verification is required to verify that expectations have been met. After 4 years, the CIP process starts afresh, with new assessments and a new tailored CIP created. The producer implements more changes and evidence submission starts again.

EDP

Health and Safety Policy

4.6

EDP Health and Safety Policy

The Health and Safety of all those who contribute to the development of the activities of the companies which are part of the EDP Group, workers, suppliers, Contractors, customers and other stakeholders is deemed a key value and a priority for the success of EDP as a business Group. The consolidation of a positive safety culture is only possible with the participation and involvement of everyone in a participatory and collaborative attitude towards safety at work.

People are at the centre of the EDP Group's strategic agenda, which assumes the responsibility of ensuring the necessary conditions for its adaptation to the new demands of work motivated by the evolution of the business and the digitization of processes, particularly in matters related to Occupational Health and Safety.

EDP makes a commitment based on the principles for sustainable development and, through applying the highest ethical standards, exceptional performance levels will be achieved making the EDP Group an increasingly better place to work.

The EDP Commitment

The corporate management of the EDP Group is determined to constantly strengthen the culture of Occupational Health and Safety, by developing awareness, deepening willingness and making available the resources required for:

- Ensuring a safe and healthy work environment guaranteed to prevent adverse health effects;
- Ensuring compliance with legislation and other requirements voluntarily undertaken by the EDP Group;
- Promoting the training and informing of employees regarding activity-related risks, raising their awareness of compliance with safety standards and procedures;
- Protecting facilities and equipment by adopting the best techniques, combined with monitoring and updating operating procedures in order to eliminate or minimize risks to employees, Contractors and stakeholders who might come into contact with the EDP Group's infrastructures.

- Ensuring the participation and consultation of workers and their representatives in planning, implementing and evaluating the performance of Occupational Health and Safety management.

Safety is an integral part of the quality of the services and products of EDP Group companies.

The efficacy of the safety policy and the ongoing improvement of the EDP Group in the area of Occupational Health and Safety must be achieved with the involvement of all management levels and the support and contribution of all employees, Contractors, suppliers and the other stakeholders.

To this end, the EDP Group requires everyone to adopt practices in line with the principles of this policy.

Guidelines for occupational health and safety practice within the EDP Group

1. Safety – understood as Occupational Health and Safety – is an integral part of the activity of the EDP Group companies and is present in every decision: in planning, construction, operation and maintenance, in staff management, procurement, commercial activities, customer relations, supplier relations and with the general public.
2. Safety is an attitude and a will – inherent in everyone's activity – which is expressed at all times in the respect for and compliance with the legal requirements, standards, rules and procedures applicable, and in the initiative and contribution to its improvement.
3. Safety is an inherent component of line management, with line managers being responsible for enforcing regulations, undertaking a visible, permanent personal commitment, promoting training and information provision for their employees and controlling the environment in which work takes place.
4. At all times and under any circumstances, each Company undertakes its activities aiming at "zero accidents" through the continuous improvement of safety management and performance, defining concrete goals for progress.
5. Safety at work should be achieved through the systematic analysis of risks, involving the workers and their representatives, as well as Contractors, as applicable, so

as to identify and deal with all situations with potential risk, during the preparation of the work, in order to converge to an acceptable level of risk. If safety conditions for the carrying out of a job are not sufficient, it must not be started or, if it is already in progress, it must be stopped.

6. The investigation and analysis of incidents – accidents and nearaccidents – will be carried out systematically and conclusions will be drawn to prevent their repetition, an essential condition for the ongoing improvement of the prevention of occupational accidents and adverse health effects.
7. No action shall be taken against any employee who expresses concern about an Occupational Health and Safety matter or is involved in a nearaccident, unless s/he has consciously and intentionally carried out an illegal action or willfully disregarded a safety rule or procedure.
8. Safety procedures must be kept up to date at all times in accordance with existing risks and the applicable local regulations.

Approved by the Executive Board of Directors on the 28th July 2020.

EDP Environmental Policy

4.7

EDP Environmental Policy

A – OBJECTIVE AND SCOPE

1. Foundation

The continuous growth in the world's population supported by economic models and consumption patterns that lead to climate change, the accelerated degradation of natural resources and biodiversity and the inherent risks to public health, require responsible actions from companies as well as proactive and differentiating strategies capable of reversing these trends, promoting respect for the environment and the development of a society based on sustainable consumption patterns.

The EDP Group's activities are carried out within the framework of its Sustainable Development Principles, guided by the highest ethical standards while consistently promoting the guiding principles of the United Nations (UN) Global Compact.

In this sense, and recognizing the crucial role of the energy sector, EDP – Energias de Portugal, S.A. (EDP) is committed to contributing to the successful implementation of nine Sustainable Development Goals (SDGs) of the UN Agenda 2030, and highlighting those of greatest environmental relevance: (i) 7 – contributing to ensuring affordable, reliable and sustainable energy, (ii) 12 – contributing to ensuring sustainable production and consumption patterns (iii) 13 – acting to combat climate change, and managing the risks arising from this, (iv) 15 – collaborating in the protection of life on Earth, through the sustainable use of terrestrial ecosystems and, in particular, fresh water, and (v) 17 – establishing partnerships to accelerate the implementation of these objectives.

This EDP Group Environmental Policy outlines the strategy and respective action plans, the implementation of which must be monitored, giving priority to the use of methodologies of recognized international merit.

2. Objective

This Environmental Policy establishes EDP's vision and commitments regarding the management of environmental and climate issues, the guiding principles for the ongoing improvement of environmental performance, in the short and long term, and the foundations for the definition of objectives and targets for the EDP Group in considering the expectations of stakeholders.

3. Scope

The Environmental Policy applies to (i) EDP (ii) companies 100% owned, directly or indirectly, by EDP and (iii) the companies in which EDP is in a controlling relationship within the limits established in the Binding Instructions and in the Policies and Procedures in force. This Policy is also applicable to Fundação EDP, to Fundação EDP and to Instituto EDP – which, for the purpose of this normative, shall be considered part of EDP Group.

The Environment Policy is also applicable to entities that provide services at EDP facilities or in the name of and on behalf of companies that are part of the EDP Group.

EDP will also promote the application of the principles of this policy to the other stakeholders in the value chain, whether these are joint ventures, customers, or service providers.

B – EXTERNAL AND INTERNAL REFERENCES

The preparation of this Environmental Policy was based on the following guidelines:

4. External:

- ISO 14001:2015
- ISO 26000:2010
- Global Reporting Initiative
- UN Global Compact
- ISO 14040:2005/AMD:2020
- Sustainable Development Goals – United Nations 2030 Agenda
- OECD Guidelines to Multinational Enterprises

5. Internal:

- Principles of Sustainable Development for the EDP Group
- EDP Code of Ethics
- Supplier's Code of Conduct
- Stakeholder Relations Policy
- EDP's Social Investment Policy

6. Terms and Definitions

Due diligence: this is the process of analyzing a company before entering into a contract. The analysis includes areas of activity, the outlook regarding the future of the business, and the status of its assets and liabilities.

Joint venture: agreement between two or more companies that establishes strategic alliances for a common commercial objective, for a fixed period.

Climate adaptation: internalizing the knowledge and practices necessary to strengthen the capacity of the company to prevent, respond to and repair damage resulting from the effects of climate change, in the context in which it operates, while taking advantage of the opportunities that may arise.

Circular economy: this is a production and consumption model which involves sharing, leasing, reusing, repairing, reconditioning, and recycling existing materials and products for as long as possible. In this way, the product life cycle is extended.

Natural Capital: a way of contextualizing nature and assessing the environment from an economic perspective, with the living (for example, biodiversity) and non-living (for example, fossil fuels, minerals, metals, wind, and solar energy) elements of the environment seen as a "stock" or an "asset", resulting in numerous benefits in the form of ecosystem services.

Ecosystem Services: these are the benefits that people derive from ecosystems. These include provisioning services, such as food and water; regulating services such as flood, drought, land degradation and disease regulation; support services such as soil formation and nutrient cycling; and cultural services, such as recreational, spiritual, religious services and other non-material benefits.

Mitigation hierarchy: a framework for managing risks and potential impacts related to biodiversity and ecosystem services. This results from a sequence of actions to anticipate and avoid and, where it is not possible to avoid, minimize, and, when impacts occur, restore, and, where significant residual impacts persist, compensate with biodiversity offsets.

7. Description and Responsibilities

EDP recognizes the Environment as a strategic management element, aiming to reduce the impacts and dependencies of its activity through a set of commitments that ensure the implementation and maintenance of appropriate and effective environmental management systems, with the ultimate purpose of Sustainable Development, namely:

- Protect the Environment and integrate its components within decision-making processes at the different stages of development, construction, operation, and decommissioning of infrastructure;
- Properly manage environmental risk, in particular pollution prevention and emergency response in the event of an accident and/or catastrophe;
- Promote ongoing improvement in environmental processes, practices, and performance, stimulating Research and Development and Innovation;
- Comply with applicable environmental legislation, as well as other voluntarily obligations;
- Consider the relevant expectations of the main stakeholders in decision-making processes;
- Extend the management and improvement of environmental performance to the value chain, particularly by including environmental criteria in the selection of suppliers;
- Communicate our performance in a regular and transparent manner to all stakeholders, in particular to local communities;
- Raise awareness regarding the need to improve individual and collective environmental performance, thereby contributing to the public debate;

- Consider the commitments of this Policy when making decisions during due diligence processes related to mergers and acquisitions.

Based on the Group's strategic priorities, EDP also makes specific commitments in order to protect the environment and enhance natural capital:

CLIMATE CHANGE

Achieve carbon neutrality in its activity through:

- Increasing its renewable energy portfolio;
- Ongoing reduction of direct and indirect greenhouse gas emissions;
- Providing low carbon energy solutions to its customers, promoting electrification of consumption and energy efficiency;

Promote climate adaptation, maximizing the resilience of its assets to climate change.

CIRCULAR ECONOMY

Promoting efficient use of natural resources in its activities, wherever possible, within the framework of a life-cycle analysis, in particular:

- Minimize the use of natural resources necessary to properly carry out its activities;
- Optimize and efficiently manage internal products and services, promoting a circular economy for our customers;
- Maximize the recovery of waste and its reintroduction into the economy as by-products;

Pay special attention to the water resource, promoting its sustainable management, either by minimizing its consumption or by mitigating the impacts on its quality.

BIODIVERSITY

- Contribute to reducing the loss of biodiversity, promoting the mitigation hierarchy, and in the long-term aim for a net benefit in terms of biodiversity;

- Contribute to deepening scientific knowledge of biodiversity and ecosystem services, namely through the establishment of partnerships.

8. FINAL PROVISIONS

The objectives of the Policy are implemented through the definition of goals, action plans and monitoring indicators. The choice of indicators and the definition of goals should attempt to be “SMART”^[1], promoting ongoing improvement, implemented in short, medium and/or long-term action plans which are monitored periodically, both in terms of operations and coordination and consolidation at the corporate level and/or within the scope of the compliance function.

8.1 Policy Adjustment in the context of the Group's companies

The scope of the Environmental Policy is for the group of companies that make up the EDP Group, however, taking into account the specificities of each of these companies, there may be case-by-case adaptations to the aforementioned Policy in the following cases:

- I. Some commitments may not be applicable to the reality of a particular company;
- II. Specific commitments may be added, given the context in which a company carries out its activities.

8.2 Revision

This Policy will be revised at least every three years or whenever the external context or the strategic framework of the EDP Group so requires, either at the initiative of one of the Corporate Center Departments or at the initiative of one of the EDP Group companies represented on the Sustainability Committee. In any of these situations, the revision process must be carried out by the structure that proposed it, with the support of the Sustainability Department, while involving the other EDP Group structures whose activities are related to the revision to be undertaken.

8.3 Responsibilities

The Executive Board of Directors is responsible for approving the Environment Policy and its successive revisions.

The Sustainability Committee is responsible for assessing the proposals submitted to the Executive Board of Directors.

The Sustainability Department is responsible for monitoring the implementation of the Policy at the Group level, as well as any revisions.

The Business Units are responsible for implementing the Policy within the scope of their activity and taking the initiative of proposing suggestions for changes to the Policy to the Sustainability Department.

8.4 Communication

Each of the companies that make up the EDP Group is responsible for communicating to stakeholders the Environmental Policy and the commitments assumed, as well as the environmental performance achieved within the specific context of each of them, with the appropriate periodicity and detail. In the event that the companies that make up the EDP Group identify context-specific aspects, they must refer to the respective framework within the EDP Group's Environmental Policy.

8.5 Stakeholder expectations

Identifying and integrating stakeholder expectations in the environmental performance of the EDP Group must comply with the Stakeholder Management Methodology Guide in force.

8.6 Training

The Environmental Policy must be included in the curriculum contents of internal environmental training, throughout the EDP Group and externally, with suppliers and service providers, especially those who act in the name and on behalf of any of the companies that make up the EDP Group, as well as partner entities, when applicable.

[1] Specific, Measurable, Attainable, Realistic, Timely

Approved by the Executive Board of Directors on the 17th February 2021.

EDP

Personal Data Protection Policy

4.8

EDP's Personal Data Protection Policy

The EDP Group companies always prioritize in their relationship with their customers, employees, service providers, suppliers, partners and other interested parties, strict respect for their privacy. The protection of personal data is a cornerstone of the EDP Group companies' activity. Ensuring that we carry out our activities in compliance with all data protection legal requirements and highest standards is fundamental for us.

Hence, the EDP Group companies adopt and follow specific Privacy Policies comprised in the Group's global compliance risk management approach, which content is disclosed to relevant data subjects. These Privacy Policies apply to the entire lifespan of data processing operations carried out by Group Companies and Service Providers. Service providers process the personal data only following documented instructions from EDP.

Data Protection Officer or equivalent officers are appointed in geographies/business units where such legal requirement exists and whenever EDP deems it relevant, despite the inexistence of such requirement. EDP also designates teams responsible for ensuring that the organization complies with legal and regulatory requirements, policies and guidelines approved internally, through the implementation of methodologies and procedures aimed at preventing, detecting and addressing any deviation or non-conformity that might occur, as well as supporting Group employees and raising awareness about the rules to be observed when processing personal data.

These Data Protection Officers or equivalent officers are permanently available to the data subjects, also ensuring the interactions with the competent data protection authorities.

The EDP Group incorporates mechanisms to safeguard data protection in all of its new projects, products and services, continuously monitoring how they impact the privacy of its customers and other data subjects. In this way, we intend to mitigate any data protection risks while ensuring sustainable and ethical innovation and growth. The Group leverages the potential of information technologies in a responsible manner, seeking to avoid any type of discrimination and explaining to all agents involved how such technologies affect their privacy.

In order to support its firm commitment, the EDP Group globally observes the following values and principles:

1. LAWFULNESS AND PURPOSE

EDP Group companies only process personal data for legitimate and clearly defined purposes. The main reason we use data is for the performance of contracts with our customers or, for the management of our operation, contracts with employees, contracts with service providers and other stakeholders.

On the other hand, there are several laws in the legal system that establish legal obligations, which lead to the processing of personal data. For example, tax obligations, corporate reporting or in the context of preventing money laundering and terrorism financing. The processing of data in these cases is the strictly necessary for the fulfillment of such obligations.

For example, if we need to use information about the residence or energy consumption of our customers, we will only do so to provide the requested services or to comply with our legal obligations, unless we have obtained the explicit consent of the data subjects or if our business interests do not override their private sphere.

In fact, unless our customers object at the time of the collection of their contact details and on any other occasion, we use our customers' data to electronically communicate our own similar products. We can also use them to collect overdue debts. These processing operations are carried out within the scope of the performance of the contract and, also, under EDP's legitimate interest, always ensuring that fundamental rights and freedoms of the data subjects are not overridden by such interest.

Lastly, always subject to the explicit consent of the data subjects which can be withdrawn at any time, we may use the collected data for other purposes such as the publication in our internal and external communication channels of images of employees and other participants in internal and public events or to communicate to our customers new products and services adapted to their needs and preferences.

2. FAIRNESS AND TRANSPARENCY

We inform all our customers, users, employees, suppliers and partners about how we process their personal data, why we do it, for how long we keep them and with whom we share them. Where appropriate, we ask data subjects for their informed consent, not harming them if they decide not to consent or to withdraw their consent.

In the event of a personal data breach, we notify the competent supervisory authority and communicate it to the relevant data subjects, whenever the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons. We seek to immediately repair or minimize its negative effects.

3. PROPORTIONALITY

We only collect and use personal data that is strictly necessary in relation to our legitimate purposes.

EDP collects and processes identification data (name and civil or tax identification numbers, contact details: addresses and telephone contacts), data from its customers' energy installations and other information related with the contractual relationship, such as products and services acquired, payment or debts information.

Personal data will only be accessed by persons or entities that have an effective need to know it. These persons will act on our behalf and under our instructions and observe the strictest confidentiality rules. As described above, personal data may also be accessed by tax authorities, other regulatory or supervisory authorities, courts and other entities to whom EDP is required to communicate data under the law.

Once the data is no longer needed, EDP Group permanently erases or makes it unintelligible, unless its retention is legally mandatory.

4. CONTROL

All data subjects of personal data used by EDP Group companies have control over their own data. EDP Group companies provide adequate channels for the exercise of their rights of access, rectification, erasure, limitation, portability and opposition, ensuring effective and timely responses. At EDP, we seek to make things clear to you and respect your decisions.

In addition, EDP continuously monitors compliance with its Privacy Policies, both internally and by its external service providers.

In case of non-compliance with these regulations, EDP has a “zero tolerance” approach, applying the appropriate disciplinary or contractual measures.

5. PRIVACY SINCE “0” MOMENT

When designing a new business or service model, EDP Group companies assess its impact on data subject's privacy, striving to mitigate the risks that may arise from it. In this context, EDP implements security techniques (such as pseudonymization) whenever applicable, restricts access to data to a limited number of people and consults with legal advisors or the competent authorities for advice on the best way to comply with data protection legal requirements.

6. RESPONSIBILITY

We define accountabilities, responsibilities and reporting lines in each EDP Group company in order to ensure compliance with data protection legislation. In this way, each department and employee is, at all times, aware of the concerns they must consider when processing personal data in the exercise of their functions as well as about how to act in case of detection of a personal data breach that may negatively affect the privacy of data subjects.

7. SECURITY

We implement technical measures in line with the best market practices and develop processes and procedures that allow us to maintain all personal data that we handle in appropriate security conditions, considering the risks involved.

In this regard, the EDP Group limits and controls access to all its IT systems, applies encryption and anonymization techniques to the information it stores and performs periodic backups. EDP Group Information Systems Security area works continuously to prevent undue access to the personal data we process and to guarantee the permanent resilience of our companies' information systems.

Additionally, EDP only uses information technology service providers that offer sufficient guarantees of compliance with the rules and data protection in force.

EDP reserves the right to change this Personal Data Protection Policy at any time. Any changes will be duly publicized on the website.

Approved by the EBD in a meeting held in June 2nd, 2020.

EDP Integrity Policy

4.9

EDP's Integrity Policy

Considering:

- The definition of Integrity is broadly associated to concepts of honesty, transparency, awareness and responsibility, as well as to a consistent adherence to solid moral and ethical principles, but also with strict legal and normative compliance;
- The commission of criminal and administrative unlawful acts such as corruption, influence peddling, money laundering and terrorism financing, discrimination, insider trading/dealing, antitrust/anti-competitive practices, disrespect for privacy and for the need for data protection and the requirements to safeguard the confidentiality of information, as well as non-compliance with environment, health and safety law, among others, may, in certain cases, undermine public peace, safety and the well-being of citizens, as well as market stability, and may have implications at several levels: (i) political, since it destabilizes democracy and the rule of law; (ii) economic, since valuable resources necessary for the growth and development of society are diverted; (iii) social, since it fosters instability, insecurity and distrust on the part of the citizens; and (iv) environmental, since it may bring about the deterioration of the ecosystem;
- Both at national and international level, there has been a common approach for the prevention and combating of this kind of unlawful acts, based on a zero-tolerance policy, entailing the adoption of increasingly more stringent and demanding laws, which fosters cooperation between private entities and public authorities;
- The evolution of the EDP Group's context, both in terms of the activities undertaken and in relation to its legal and regulatory framework, in particular the publication in Portugal of the General Regime for the Prevention of Corruption (Decree Law n.º 109-E/2021 of December 9th), and the evolution of the best international practices in the area of integrity, as well as the lessons learned with the application of the Group's Integrity Policy initially defined and implemented in 2018 and revised in 2020;

- The permanent need to align the EDP Group's business operations with the best market practices and with strict compliance with the law and regulations applicable to its activities, namely in terms of preventing and combating the practice of illegal acts, in particular, conducts associated with the practice of acts of corruption, bribery, money laundering and terrorism financing.

A new revision of the EDP Group's Integrity Policy and of the commitments and principles assumed in this matter is carried out, thus reinforcing EDP's active role in promoting integrity and preventing unlawful acts.

2. PURPOSE

This policy aims to define the general principles of action and the duties for EDP Group companies, its directors, employees and business partners, in order to avoid the commission of criminal and administrative offences, in particular, conducts associated with crimes of corruption and bribery, money laundering and terrorism financing, antitrust/anti-competitive practices and non-compliance with data protection requirements.

In addition, it intends to contribute to the promotion of ethical conducts and integrity in the development of the EDP Group's businesses, ensuring compliance with the law and the adopted principles and rules.

3. SCOPE

This Policy is applicable to all entities that make up the EDP Group, its directors, employees, service providers who act in their name or on their behalf and in their direct or indirect interest, regardless of the nature or form of their legal relationship, always in strict compliance with the legal framework applicable in the geographies where the Group is present, namely with regard to EDP Renováveis, S.A., EDP España, S.A. and EDP – Energias do Brasil, S.A. This policy also applies to Fundação EDP, Fundación EDP and Instituto EDP – which, for the purposes of this policy, will be considered part of the EDP Group – its employees and service providers who act on their behalf.

This Policy does not seek to address all legal and regulatory requirements of all jurisdictions where the Group operates, but instead seeks to establish a common commitment in order to ensure compliance with all applicable laws and the principles that bind the Group and its entities.

The controlled entities/companies of the EDP Group and their respective subsidiaries may approve their own policies and procedures, thus ensuring compliance with the applicable local law. In any case, full compliance with the provisions of this Policy must be guaranteed.

Whenever local legal requirements applicable to subsidiaries are less stringent than this Policy and other policies and related procedures, they shall ensure alignment with the principles set out in Group policies.

Local policies that adapt and develop the principles of this Policy to the particularities of the respective jurisdiction, as well as any exception to the application of this Policy due to local legal restrictions, shall be submitted for consultation and review by the Compliance & Internal Control Global Unit (“C&IC”) and by the Legal & Governance Global Unit (“L&G”).

Adequate coordination must be maintained so that such policies or procedures remain permanently consistent with the principles established in this Policy and other related procedures.

EDP’s representatives in the management bodies of the controlled companies, whether based in Portugal or abroad, are responsible for adopting the measures and carrying out the necessary acts for the implementation of this Policy.

EDP representatives in joint ventures and/or in companies in which the EDP Group does not hold a controlling position will always ensure the observance of the provisions of this Policy in the performance of the respective functions and endorse, as far as possible, the application of its principles or similar principles in those companies, namely by promoting the development of specific policies and procedures for that purpose.

4. REFERENCES

• ISO 37301 – Compliance management systems; • ISO 37001 – Anti-bribery management systems; • Decree-Law n.º 48/95, of March 15th, amended by Law n.º 94/2021, of December 21st (Portuguese Penal Code); • Ley Orgánica 10/1995, of November 23rd (Spanish Penal Code); • Law n.º 83/2017, of August 18th, amended by Law n.º 99-A/2021, of December 31st – measures for the fight against money laundering and terrorism financing; • Law n.º 52/2019, of July 31st, which approves the regime for the exercise of functions by holders of political and high public offices; • Decree Law n.º 109-E/2021, of December 9th, which creates the National AntiCorruption Mechanism and establishes the General Regime for the Prevention of Corruption; • Directive (EU) 2019/1937 of the European Parliament and of the Council, of

October 23rd of 2019 on the protection of persons who report breaches of Union law; • Law n.º 93/2021, of December 20th, which establishes the general regime for the protection of whistleblowers of breaches, transposing Directive (EU) 2019/1937 of the European Parliament and of the Council, of October 23rd of 2019; • Directives (EU) 2018/843 of the European Parliament and of the Council, of May 30, 2018, which amends Directive (EU) 2015/849 of the European Union concerning the prevention of the use of the financial system for the purposes of money laundering or terrorism financing; • Organization for Economic Cooperation and Development Standards (“OECD”); • Financial Action Group Recommendations and Guides (“FATF”); • Law n.º 12.846, of August 1st, 2013 (Brazil), which provides for the administrative and civil liability of legal entities for the practice of acts against the public administration, national or foreign, and makes other provisions; • Foreign Corrupt Practices Act (FCPA) – United States of America; • Bribery Act – United Kingdom.

5. TERMS AND DEFINITIONS

For purely interpretative purposes of this Policy, the terms and definitions used therein will have the meaning described below.

Money Laundering: Act of conversion, transfer, assistance in or facilitation of any operation of conversion or transfer of advantages, obtained directly or indirectly, by the agent or by a third party, through the typical illicit acts provided for in Article 368.º – A) of the Portuguese Penal Code, with the purpose of dissimulating their unlawful origin, or avoiding criminal consequences or prosecution for the agent or participant. The definition of money laundering, for preventive purposes, also includes participation in such acts, the association to practice them and the attempt and complicity in their practice, as well as facilitating their execution or advising someone to practice it.

Employee: The natural person hired by any of the EDP Group companies, on a permanent or temporary basis, under an employment contract or professional internship contract, including similar situations.

Conflict of Interests: Situation in which the purpose or the pecuniary or nonpecuniary advantages, whether related or unrelated, which a given employee intends to pursue or achieve with the practice of an action, is suitable to interfering with the performance of duties of impartiality, objectivity and compliance with the Code of Ethics by which the employee is bound in the pursuit of his/her duties or with the interests that the entity of the EDP Group must pursue.

Corruption: There are various types of corruption, but the following are the most relevant for the purposes of this Policy:

- Passive corruption (of a public official or holder of political office): The request, receipt or acceptance of the promise, directly or indirectly, of any undue advantages, for their own benefit or that of third parties, for the practice or abstention from the practice of an act in the exercise of their functions, contrary or not to the duties of the position, even if prior to that request, receipt or acceptance of the promise;

- Active corruption (of a public official or holder of political office): The promise to deliver or delivery, directly or indirectly, of undue advantages, for their own benefit or that of third parties, so that an official or holder of political office practices or refrains from performing an act in the exercise of their functions, contrary or not to the duties of office, even if prior to that promise or delivery;

- Active corruption to the detriment of international trade: The promise of delivery or the delivery, directly or indirectly, of undue advantages, to an employee (national, foreign or from an international organization), to a holder of a political office (national or foreign), or to a third party with knowledge of them, to obtain or retain business, a contract or other improper advantage in international trade;

- Passive corruption in the private sector: The request, receipt or acceptance of the promise, directly or indirectly, of any undue advantages, for their own benefit or that of third parties or their promise, for any act or omission by the private sector worker that constitutes a violation of their functional duties;

- Active corruption in the private sector: The promise of delivery or the delivery, directly or indirectly, of undue advantages, for their own benefit or that of third parties, so that the private sector worker performs or refrains from performing an act in violation of their functional duties

Decision-maker: All natural persons who, by virtue of the exercise of their respective functions, have direct or indirect authority and responsibility for the planning, direction, and control of activities in EDP Group shall be considered decision makers, under the terms described below:

- (i) The members of EDP’s corporate bodies and its Subsidiaries Companies;

- (ii) (ii) EDP Group employees classified in job grades from 20 to 25 regardless of the EDP Group company with which they have a contractual relationship of in which they perform duties;

- (iii) (iii) Whenever the decision maker defined in (ii) identifies, as decision makers, other Group employees, with a job grade lower than 20, to whom he/she has attributed identical competencies;

- (iv) (iv) Whenever the EBD expressly qualifies EDP Group employees as decision-makers, indicating the respective scope of activity. Top Management: Managers or employees with a sufficiently high level of hierarchy to make decisions that affect EDP's exposure to the risk of non-compliance, not necessarily being a member of the management bodies. Members of management bodies and first-line directors who report directly to members of management bodies are generally understood as such. Donations: Contribution in cash or any other nature, granted to any third party, public or private, namely to entities whose activity consists predominantly in the realization of initiatives in the social, cultural, environmental, sports or educational areas. Family / Close family members: Spouse or cohabiting partner, relatives, by bloodline or marriage, up to the 2nd degree, in a direct line or in a collateral line, the cohabiting partners of such relatives, insofar as they do not benefit from the status of affinity, and also the people who, in other legal systems, have similar positions.

Terrorism Financing: Act of supplying, collecting or holding (directly or indirectly) funds or assets of any kind, as well as products or rights capable of being transformed into funds, intended for use or knowing that they may be used, in whole or in part, in the planning, preparation or commission of terrorist acts.

Public official:

- (i) Civil and military public servants;
- (ii) Anyone who holds public office by virtue of a special bond;
- (iii) Anyone who, even provisionally or temporarily, for remuneration or free of charge, voluntarily or compulsorily, has been called upon to perform or

participate in the performance of an activity included in the public administrative or jurisdictional function;

- (iv) The judges of the Constitutional Court, the judges of the Court of Auditors, the judicial magistrates, the magistrates of the Public Prosecutor's Office, the Attorney General of the Republic, the Ombudsman, the members of the Superior Council for the Judiciary, the members of the Superior of the Administrative and Fiscal Courts and the members of the Superior Council of the Public Ministry;
- (v) The arbitrator, the jury, the expert, the technician who assists the court in judicial inspection, the translator, the interpreter and the mediator;
- (vi) The notary;
- (vii) Anyone who, even provisionally or temporarily, for remuneration or free of charge, voluntarily or compulsorily, performs or participates in the performance of a public administrative function or exercises authority functions in a collective person of public utility, including private institutions of social solidarity;
- (viii) Anyone who performs or participates in the performance of public functions in public association;
- (ix) members of a management or administrative body or fiscal body and employees of public, nationalized companies, with public capital or with a majority share in public capital, and also public service concessionaire companies, and in the case of companies with a shareholding equal or minority shareholder in public capital, holders of a management or administrative body designated by the State or by another public entity are treated as civil servants;
- (x) Judges, officials, agents and equivalents of public international law organizations, regardless of nationality and residence;
- (xi) National officials of other States;
- (xii) All those who exercise functions identical to those described in i) to viii) within the scope of any international organization governed by public law of which Portugal is a member;

(xiii) Magistrates and officials of international courts, provided that Portugal has declared that it accepts the jurisdiction of these courts;

(xiv) All those who exercise functions within the scope of extrajudicial dispute resolution procedures, regardless of nationality and residence;

(xv) Jurors and arbitrators who are nationals of other States.

Facilitation payment: Payment intended to encourage or expedite the performance of an act, not contrary to the duties of the respective positions or functions. Consequently, the facilitation payment always presupposes the demand for a consideration associated with the performance of an act, or adoption of a conduct without such payment being required in the light of the applicable rules.

Personal safety payment: Payment made to a public official in order to ensure health or an individual personal security facing a serious risk.

Designated individuals, entities or countries: Individual, entity or country targeted by restrictive measures adopted by European Union, United Nations Security Council, United States of America Office of Foreign Assets Control (OFAC) or United Kingdom Her Majesty's Treasury.

Sponsorship: Contribution in cash or in kind, granted to public or private entities in order to promote the sponsor's name, image, brand activities or products.

Politically Exposed Person ("PEP"): Actual person who holds, or has held in the previous 12 months, in any country or jurisdiction, the following prominent public offices: i) Heads of State, Heads of Government and members of Government, specifically ministers, secretaries and under-secretaries of State or equivalents; ii) members of Parliament; iii) members of the Constitutional Court, the Supreme Court of Justice, the Supreme Administrative Court, the Court of Auditors, and members of the supreme courts, constitutional courts and other high-ranking judicial bodies of other States and international organizations; iv) representatives of the Republic and members of the government bodies of the autonomous regions; v) Justice Ombudsman, Councilors of State, members of the National Data Protection Commission, the Higher Council of the Judiciary, the Higher Council of the Administrative and Tax Courts, the Office of the Attorney-General of the Republic, the Higher Council of the Public Prosecutor's Office, the Higher National Defense Counsel, the Economic and Social Council, and members of the Regulatory Body for the Media; vi) ambassadors and consuls; vii) General officers of the

Armed Forces and the National Republican Guard (GNR) in active service, as well as the Chief Superintendents of the Public Security Police (PSP); viii) mayors and councilors with executive municipal council positions; ix) members of the boards of governors and supervisory boards of central banks, including the European Central Bank; x) members of the boards of governors and supervisory boards of public institutes, public foundations, public establishments and independent administrative entities, however designated; xi) members of the boards of directors and supervisory boards of state business sector entities, including the business, regional and local sectors; xii) members of the executive management bodies of national or regional political parties; xiii) directors, deputy directors and members of the board of directors or persons who hold equivalent positions in an international organization.

Persons recognized as being closely associated: i) Any natural person, known to be a joint owner, with the politically exposed person, of a legal person or of a center of collective interests with no legal personality; ii) Any natural person who holds the share capital or voting rights of a legal person, or the assets of a collective interests center with no legal personality, which is known to have a politically exposed person as the beneficial owner; iii) Any natural person known to have corporate, commercial or professional relations with a politically exposed person.

Prevarication: Whenever the Employee, within the scope of a procedural investigation, judicial proceeding, administrative offense or disciplinary action, knowingly and against the law, promotes or does not promote, conducts, decides or does not decide, or performs an act in the exercise of powers arising from the position he holds, regardless of to benefit or harm someone with your behavior; or by a holder of political office who knowingly conducts or decides against the law in a process in which he intervenes in the exercise of his functions, with the intention of, in this way, harming or benefiting someone.

Global Compliance Program / Compliance Management System: Set of transversal compliance mechanisms, designed to promote and monitor compliance with relevant regulations in all activities, businesses and geographies in which the EDP Group is present.

Ethics Ombudsman: Responsible for receiving complaints of an ethical nature addressed to EDP Group entities, instructing and documenting the respective processes and for guaranteeing the confidentiality of the identity or anonymity of the complainant.

Undue offer / receipt of advantage: The promise or offer / request or acceptance, directly or indirectly, of undue advantages to an Employee, a Holder of Political Offices or a third party, indicated by him or with his knowledge, resulting from the exercise of functions by the first or

that take place because of these functions, except if it is a matter of socially appropriate conduct and in accordance with usages and customs.

Retaliation: Application of retaliation, or revenge.

International Sanctions: Restrictive measures adopted by specific countries, regional governments or any other entities or multinational organizations under specific international applicable policies and, usually, in pursuit of security objectives. Sanctions may have a trade, economic or financial nature and can target other countries, specific individuals, institutions, entities or goods and services.

Third party: Any physical or legal person who is not an employee but participates in the activities of or represents any EDP Group entity, in the capacity of service provider, supplier as well as business partners or costumers of any company of the Group.

Holders of other political or public offices: Natural persons who, not being qualified as politically exposed persons, perform or have performed, in the last 12 months and in national territory, the positions listed in articles 2 and 3 of Law no. 52/2019, of 31 of July, which approves the exercise of functions by holders of political offices and high public offices. These are the following positions: (i) Candidates for President of the Republic; (ii) The President of the Assembly of the Republic; (iii) The Representative of the Republic in the Autonomous Regions; (iv) Members of executive bodies of local government and holders of senior management positions of the 1st and 2nd degrees, and equivalent, and top managers of the services of city councils and municipal services, when they exist; (v) Members of Organs executive bodies of metropolitan areas and intermunicipal entities; (vi) Members of the management body of a company owned by the State, when designated by the latter; (vii) Holders of senior management positions of the 1st and 2nd grades, and equivalent, and top managers of municipal chambers and municipal services, when they exist; (viii) The heads of cabinet of members of the Republic and regional governments; (ix) Representatives or consultants mandated by the Republic and regional governments in processes for granting or disposing of public assets. Additionally, for the purposes of this policy, members of top structures of General Directorates and political candidates must also be considered holders of other public offices.

Bribery: Persuade or attempt to persuade another person, by means of a gift or a promise of a pecuniary or non-pecuniary advantage, to give false statements, testimonies, expert opinions, etc., even when these are not realized.

Employee of the private sector: Person who exercises functions, including those of management or supervision, under an individual employment contract, provision of services or in any other capacity, even if provisionally or temporarily, for remuneration or free of charge, at the service of an entity in the private sector.

Influence Peddling: On its active side, influence peddling corresponds to the promise or offer, directly or indirectly, of undue advantages, for their own benefit or that of third parties, so that the beneficiary abuses his influence with a public entity and with the purpose of obtaining an unlawful decision favorable to the interests or any claims of the person who makes the said promise or offer, directly or indirectly, of undue advantages. On its passive side, it corresponds to the request, receipt or acceptance of the promise, directly or indirectly, of any undue advantages, for its own benefit or that of third parties, so that the beneficiary abuses its influence, real or supposed, with any public entity.

Unlawful advantages: Proceeds from the commission, in any form of co-participation, of the unlawful acts that constitute the offences of incitement to prostitution, sexual abuse of children or underage dependents, pornography of minors, computer and communications fraud, extortion, abuse of a guarantee or credit card, counterfeit currency or equivalent securities, depreciation of the value of currency or equivalent securities, passing of counterfeit currency in collusion with the counterfeiter, or equivalent securities, passing of counterfeit currency or equivalent securities, or acquisition of counterfeit currency to be put into circulation or equivalent securities, computer fraud, damage related to computer programs or other information technologies data, computer sabotage, illegitimate access, illegitimate interception or illegitimate reproduction of protected program, criminal association, terrorism, drug trafficking, arms trafficking, human trafficking, aid to illegal immigration, trafficking in human organs or tissues, damage to nature, pollution, activities dangerous to the environment, or danger to animals or plants, tax or social security fraud, influence peddling, undue receipt of advantages, corruption, embezzlement, employee fraud, harmful management in a public sector economic unit, fraudulently obtaining or diverting a subsidy, grant or credit, corruption to the detriment of international trade or the private sector, insider trading or manipulation of the market, violation of the exclusive patent, utility model or topography of semiconductor products, violation of exclusive design rights, counterfeiting, imitation and illegal use of trademarks, theft, sale or concealment of products or fraud on goods and of offences punishable with a minimum term of imprisonment of six months or a maximum of over five years, as well as the obtained assets.

Undue advantages: An advantage that is not allowed under applicable laws, this Policy or other binding regulations of the EDP Group entities.

6. DESCRIPTION AND RESPONSIBILITIES

i. EDP's Commitments

EDP Group is committed to pursue its activity in strict compliance with the laws and regulations in force, together with the promotion of responsible action and guided by the highest standards of ethics and integrity. Compliance with the national and international legislation applicable to each entity in the EDP Group, as well as with this Policy and other internal policies, procedures and instruments of any kind approved and applicable, is compulsory, in any circumstance, and any acts or omissions that constitute a breach or infringement of such rules are not tolerated.

EDP Group promotes, not only, a legally compliant, but also an unbiased, honest, upright, professional and fair conduct and requires that Group entities, their employees and service providers acting on their behalf guide their behavior in accordance with this commitment.

Thus, EDP Group actively assumes a zero-tolerance policy in relation to any type of act non-compliant with legal and regulatory applicable requirements, also guaranteeing the availability to collaborate with authorities in order to detect, report and eliminate such behavior.

In this context, each EDP Group entity implements adequate procedures to prevent and mitigate the risk of occurrence of illicit practices in its activities, such as acts of corruption, prevarication, money laundering and terrorism financing, or insider trading/dealing. Additionally, these entities also adopt the necessary procedures to detect eventual occurrences of this type and to communicate them to the competent authorities.

EDP Group is also committed to periodically reviewing and adapting its internal procedures and mechanisms, and whenever they are proven inadequate, safeguarding its alignment with legal requirements and best market practices.

ii. Principles of Action

a. General Principles

All EDP employees, subsidiaries' and other Group entities employees as well as service providers' employees that act on behalf of any Group entity must know and fully comply with the procedures and rules set out in this Policy, ensuring that (i) they do not, and will not infringe

it, (ii) comply with the set of legal and regulatory rules from national or international sources applicable to the activities undertaken, (iii) do not, and will not engage in any improper, irregular or unlawful conduct, (iv) do not, and will not adopt any unlawful action in the name of EDP Group entities, or in the exercise of functions or activities within the EDP Group, and (v) do not, and will not do any act, by action or omission, which may unlawfully or unduly favor third parties, directly or indirectly, either in the private sector or in the public sector.

EDP Group entities shall only enter into formalized legal transactions with third parties, partners and clients that comply with the laws of their countries, international best practices, adopt internal procedures aligned with EDP Group internal policies and standards, and undertake to comply with social responsibility practices in their chain of production.

The practice of any acts or omissions that may fit or create the appearance of framing with situations that constitute crime or that result in non-compliance with legal and regulatory rules and with the integrity rules to which the EDP Group is bound is totally forbidden. Any practice or conduct that may configure, assist or appear any of the situations below are, in particular, strictly forbidden.

- a) corruption;
- b) bribery, including facilitation payments;
- c) money laundering and terrorism financing;
- d) influence peddling;
- e) embezzlement, harmful management in a public sector economic unit;
- f) fraud, extortion; g) other crimes against justice;
- h) insider trading/dealing;
- i) crimes against data protection and privacy;
- j) breach of information security and cybersecurity rules;
- k) crimes against environment and safety;

- l) antitrust/anti-competitive practices;
- m) practices that violate tax legislation;
- n) non-compliance with requirements for the preparation and reporting of financial and accounting information;
- o) financing or association of EDP's brand to political parties, candidates, campaigns, political candidacy structures or related persons or entities;
- p) discrimination against customers or counterparts based on ancestry, gender, race, language, territory of origin, religion, political or ideological beliefs, education, economic status, social status or sexual orientation.

b. Preventing corruption

The EDP Group adhered to the 10 principles of the United Nations Global Compact, which includes the Anti-Corruption principle and within which companies must work to fight corruption in all its forms.

The EDP Group entities, their employees and service providers acting on their behalf may not, under any circumstances, directly or indirectly, give or promise to PEPs, holders of political or public office, public officials, private sector employees and close family members or persons recognized as being closely associated to the aforementioned, as well as to any other third parties, pecuniary or nonpecuniary advantages, that are not owed to them, including facilitation payments.

In addition, they may not under any circumstances, directly or indirectly, request or accept, for themselves or for a third party, pecuniary or non-pecuniary undue advantages, or promise of the same, for the practice of any act or omission (i) contrary, or not, to the duties of the position.

c. Prevention of money laundering and terrorism financing

EDP Group entities may only enter into business and transactions with customers and partners whose commercial activities are lawful and whose funds come from lawful sources.

EDP Group entities considered obliged to comply with the legislation and sectorial regulations related to the prevention of money laundering and terrorism financing, define and adopt

policies, internal control procedures and risk management models that are effective and adequate to their operations, in accordance with best practices and in order to comply with specific legal obligations in terms of anticipating, mitigating, preventing, identifying and monitoring this risk, as well as in what is related to the treatment of information, communication of suspicious operations and to the collaboration with competent authorities.

In particular, EDP Group entities considered obliged to comply with the legislation and sectoral regulations related to the prevention of money laundering and terrorism financing must ensure compliance with the legally established duties, namely, the duties of control, identification and due diligence, communication, abstention, refusal, conservation, examination, collaboration, non-disclosure and training.

Procedures must be adopted to ensure the knowledge of counterparties, in particular with regards to identity, respective beneficial owners, control structure and reputation. EDP Group entities considered obliged to comply with the legislation and sectoral regulations related to the prevention of money laundering and terrorism financing provide the collaboration required by the applicable judicial and sectoral authorities, reporting the operations considered suspicious.

The establishment of business relationships, the carrying out of occasional transactions or the carrying out of other operations must be refused when the identifying elements and the respective supporting evidence are not obtained, as well as information on the nature, object and purpose of the business relationship. In these situations, the entities do not initiate or immediately terminate the business relationship, they analyze the possible reasons for not obtaining the elements, means or information, and whenever the respective assumptions are verified, they report suspicious operations.

The duties, processes and procedures applicable to each of the sectors in which the obliged entities of the EDP Group operate, are materialized in the different internal Regulations and Specific Procedures for the Prevention of Money Laundering and Financing of Terrorism in force, to which reference is made.

EDP Group entities, members of its governing bodies, Employees and others bound by law or via the Group's policies, must comply with all legal and regulatory duties and the internally defined policies and procedures in this matter.

d. Facilitation payments

Facilitation payments are unofficial payments, of a tendentially small amount, made in cash or in kind, to an official, in order to secure or accelerate a decision, procedure or other lawful action, to which the party is already entitled.

The making or acceptance of facilitation payments is strictly prohibited by this Policy, and any activity that may result in a facilitation payment made or accepted or that may suggest in any way that said payment, should be avoided. However, recognizing that an employee may exceptionally be faced with situations where a payment is requested to avoid physical harm or an imminent threat to his health, safety and property, payments for personal safety are permitted under the aforesaid exceptional situations.

These payments shall, if circumstances permit, be preceded by consultation with C&IC.

When there is an imminent threat or danger, these payments may be made without prior consultation, in order to guarantee the employee's personal safety. In these situations, payments must be communicated to C&IC immediately.

e. Contributions to Political Parties

The making of contributions or the association of EDP's brand to political parties to political parties, candidates, campaigns, political candidacy structures or related persons or entities, namely through the delivery of assets or provision of services, directly or indirectly, in the name or in representation of EDP, may affect the integrity of the EDP Group entities and is, therefore, prohibited.

If an employee intends to make contributions by delivering assets or providing services, directly or indirectly, he/she may do so on an individual basis but never in association with the image or in any relation to the EDP Group entities.

EDP Group entities should make available the necessary arrangements for its employees to take part, in their strictly personal capacity, in political processes, under applicable law.

It is not permitted to use EDP Group resources, of any kind, for actions related to political processes, unless otherwise strictly required by law.

f. Gifts and Events

The offer or acceptance of goods, services, participation in events or other advantages, even if free of charge, is likely to be interpreted as being associated with undue advantages or the commission of the crime of corruption, undue receipt of advantage or other related offenses. In this context, both offers given to third parties and offers received by employees of any EDP Group entities are relevant.

Therefore, the acceptance, promise, offer or payment of gifts, presents, hospitality or participation in events will only be allowed if the applicable legal rules are met, and in accordance with the principles of the EDP Group Code of Ethics and this Policy, respecting the rules of internal procedures specifically defined for that purpose.

Regardless of the respective value, the acceptance, promise or assignment of offers contrary to the high ethical standards that guide the activities of the EDP Group and which are included in this Policy is prohibited. In particular, acceptance, promise or assignment of offers is strictly prohibited in the following cases: (i) in cash or financial instruments, or other values or instruments of a fungible nature; (ii) when the parties are involved in negotiations, bidding, contractual review / renewal processes; (iii) in other situations that may generate some undue benefit or are likely to create a conflict of interest for any of the parties involved; (iv) that have an illegal or improper purpose or are contrary to the applicable laws and regulations and (v) that are likely to resemble any of the situations mentioned above or when they have a socially reprehensible nature and / or that may jeopardize the good name and reputation of the EDP Group entities, and/or of the one who receives or gives them.

As for service providers who act in the name or on behalf of and in the interest, directly or indirectly, of the EDP Group, the acceptance or attribution of offers, or invitations to events and other similar advantages, when at the service of EDP, must not occur.

g. Donations and Sponsorships

The delivery of any kind of benefit to external entities, in the form of sponsorships or donations, shall be carried out in an ethical, honest and transparent manner, always in accordance with the applicable law, the principles of the Code of Ethics and of this Policy, as well as obeying the specific rules in the social investment policy and other applicable internal procedures.

Benefits can only be attributed to idoneous entities, subject to an integrity due diligence analysis, and these entities are also required to report about the application of financial or in-kind resources they have benefited from.

h. Conflict of Interests

Employees should not become involved in any activity potentially conflicting with the interest of EDP Group business.

The duties, processes and rules designed to ensure that there is no risk of conflict of interest are implemented in specific procedures relating to transactions with related parties (taking into account the definition of related parties provided for therein) and the prevention of conflicts of interest.

All members of the management bodies of companies / entities controlled by the EDP Group and all employees who believe that they are in an apparent, potential or real position of conflict of interest with EDP's businesses, activities and transactions must report the situation to the C&IC, and in accordance with the defined procedures, refrain from issuing an opinion, exerting influence or performing any act in decision-making processes, related to this situation, until recommendations are issued by the C&IC.

Family and close relationships between members of the management bodies, between employees, between these two or between them and third parties must be analyzed on an individual basis for the purpose of mitigating, avoiding or excluding any conflicts of interest.

Family and close relationships that may create potential conflicts of interest, referred to above, are, among others, the following:

- (i) Subordination relations;
- (ii) Professional interactions, even if they work in different areas, but where the activities performed by both are dependent;
- (iii) Situation where the worker performs selection, negotiation, assessment or other functions in the management of a contract with a third party with whom the worker has the above-mentioned ties.

If a conflict of interests risk is detected, measures shall be taken in line with the approved procedures

i. Relations with Politically Exposed Persons (PEPs)

The relationship of the EDP Group companies, employees and service providers acting on their behalf with PEPs, holders of political or public office, public officials and close family members or persons recognized as being closely associated to the aforementioned, as well as with any holder of public functions, must reflect a conduct of honesty, integrity and transparency, in any and all interactions, whether direct or indirect, active or receptive, ensuring compliance with applicable legislation and defined internal procedures.

In this sense, in all interactions with the persons mentioned in the previous paragraph, any kind of privilege or payment, either in cash or in kind (for example, gifts, entertainment, hospitality or invitations to events), intended to corrupt or obtain any type of undue advantage to oneself or to any entity of EDP Group or that can be understood in this sense, will not be tolerated.

As for the interactions maintained by service providers who act on behalf of or in the interest, direct or indirect, of any company or entity of the Group, these must be reported by them to the EDP's areas/Departments for which they are providing services, which, in turn, shall ensure the reporting of the same to C&IC.

The specific rules to be observed regarding this matter are embodied in specific procedures developed for this purpose.

j. Third Party Integrity Due Diligence

In order to deepen and strengthen the general principles of action and the duties included in this Policy and in the Code of Ethics, EDP Group entities have developed and implemented Third Party Integrity Due Diligence procedures, thus reinforcing the internal mechanisms for preventing and combating unlawful acts, in particular conducts associated with corruption, undue receipt or offer of an advantage, as well as responding to the Anti-money laundering and Anti-Terrorism Financing legal requirements, as mentioned on a previous section.

In this context, EDP Group companies, in order to assess and mitigate the integrity risk of the counterparties with whom they relate, must ensure that they know, evaluate and mitigate the integrity risks associated with the business relationships and transactions that they intend to establish, particularly with suppliers, contractors, business partners / counterparties and

M&A, beneficiaries of sponsorships and donations, job candidates and other counterparties subject to anti-money laundering and anti-terrorism financing legal requirements.

k. International Sanctions

EDP Group is committed to preventing money laundering, combating the financing of terrorism and other crimes, committing itself to taking into account international sanctions applicable to its business relationships and respective counterparties, in accordance with their legal obligations and specific procedures developed for such purpose.

Economic and trade sanctions are restrictions imposed by countries or supranational organizations on certain individuals, entities or States to achieve foreign policy measures or other objectives, namely with regard to the sovereignty of States, terrorism, human rights or nuclear threats.

Sanctions can take different forms, including:

- Trade restrictions, for example restrictions on the import or export of goods;
- Financial sanctions aimed at freezing the assets of the sanctioned person or entity or blocking access to capital markets and financial services;
- General prohibitions on investments in certain states / geographies.

EDP Group entities and their employees must endeavor to ensure that they establish business relationships taking into account the international sanctions provided for in the procedures in force, namely, they should not invest, finance, contract, form partnerships or other activities with or for the benefit of any person, entity or State designated as target of sanctions, and shall not make available, directly or indirectly, funds or economic resources that they may use or which they may benefit from.

In this context, the following lists of sanctions are considered:

- List of any economic, financial or business restrictive measure, as well as any trade and arms embargoes imposed by the EU in accordance with Chapter 2 of Title V of the Treaty on European Union and Article 215 of the Treaty on the Functioning of the Union European Union, as available on the official EU website, including any changes or additions that may exist on this or any official website;

- List of any restrictive, economic, financial or trade measures, as well as any trade and arms embargoes issued by the United Nations Security Council in accordance with Article 41 of the Charter of the United Nations, available on the official website of the United Nations, including any alteration or addition that may exist on this or any official website;

- List of individuals and entities owned or controlled by, or acting on behalf of or on behalf of targeted countries, identifying individuals, groups and entities, such as terrorists or narcotics traffickers

- List of Specially Designated Nationals and Blocked Persons (SDN) managed by the Office of Foreign Assets Control (OFAC), part of the US Department of the Treasury, including any changes or additions there may be; and

- List of any economic, financial and trade restrictive measures and arms embargoes issued by the UK Government (including but not limited to those made available on the official UK website), including any changes or additions that may exist.

iii. Compliance Programs

EDP Group adopts principles, standards, measures, processes and procedures in order to prevent, identify and respond to the practice of illegal acts provided for in this Policy and related procedures.

These mechanisms, including this Policy, are systematized in the Global Compliance Program and are defined and periodically reviewed, considering, at each moment:

- The context of the Group, its entities and its activities;
- The legal and regulatory context;
- Stakeholders expectations and inputs;
- Risk assessment results.

a. Responsibilities and Resources

EDP's Executive Board of Directors ("EBD") is the body responsible for setting out the objectives and for approving and implementing the policies and management models of the company and of the EDP Group, in line with said strategic objectives, including this Policy and the Compliance Management System and the respective governance model.

The main responsibilities of the EBD within the scope of the Compliance Management System are:

- Establish a risk culture in relation to Compliance, as well as the tone at the top;
- Define and approve the EDP Group's Compliance management methodology, ensuring its alignment with the Group's strategy;
- Approve and ensure the implementation of the Compliance Management System and Specific Compliance Programs;
- Ensuring an adequate allocation of financial, technical and human resources, as well as access to decision-making bodies and to all necessary information within the scope of the Compliance Function, with a view to the adequate performance of its responsibilities.

The Financial Matters Committee / Audit Committee ("CMF/CAUD") of the General Supervisory Board ("CGS") of EDP, as an independent body, is responsible for:

- Supervising the established risk culture in relation to Compliance, as well as the tone at the top;
- Approve and ensure the follow-up of the C&IC's Activities Plan;
- Supervise compliance with regulations and the alignment of business processes with the requirements of the Compliance Management System.

C&IC is responsible for promoting the development of the Compliance Management System and of the Specific Compliance Programs, fostering a compliance culture and ensuring, namely, the identification, assessment, monitoring and reporting of the legal

and regulatory non-compliance risks, providing mechanisms that promote compliance and also proactively and systematically advising the organization.

C&IC and the Compliance function, in the exercise of their activity and while ensuring their authority and independence, must have:

- Sufficient and adequate economic, technical and human resources, as well as sufficient skills, knowledge and experience on the nature of business and the energy sector;
- Access and ability to communicate with the CAE, the General and Supervisory Board (CGS) and the Financial Matters Committee / Audit Committee (CMF/CAUD) of the CGS, with the Boards of Directors of the different companies in the EDP Group, with the Top Management and other relevant officials;
- Unlimited access to the information and documentation necessary for the performance of its activities, without prejudice to compliance with applicable legal rules; and
- The ability to resort to internal or external advice, when necessary.

On the other hand, in accordance with the provisions of the EDP Group's compliance management methodology, employees who perform Compliance functions must act in accordance with the principles of integrity, independence, diligence and professional competence, transparency, professional secrecy, cooperation and improvement. to be continued.

The afore mentioned governance model also establishes the responsibilities and functions of the top management, the different relevant management areas, the Compliance areas of the different Business Units and the respective interlocutors in the different entities, as well as the relationship model between all these stakeholders.

b. Risk Assessment

EDP Group entities maintain processes for assessing the non-compliance, on a periodic basis and whenever there are relevant changes in context, which should include:

- i. the identification and assessment of risks that the organization can reasonably anticipate;
- ii. the respective analysis and evaluation of the adequacy and effectiveness of the existing control mechanisms;
- iii. the identification of additional risk mitigation and control measures.

c. Procedures and Internal control mechanisms

As a result of the risk assessment carried out, the EDP Group entities develop procedures and implement transversal and or specific control mechanisms, which make it possible to detail and implement the principles of this Policy and mitigate the risks identified within the scope of the Global Compliance Program.

d. Training and Communication

This Policy as well as the procedures associated with the Global Compliance Program, is widely disseminated to all employees of the companies and entities of the EDP Group and it should also be ensured that they understand its reach and significance, commit to act accordingly adopting the necessary procedures.

All new employees must have access to this Policy and to the aforementioned procedures within a reasonable period after they start working at any EDP Group entity.

The entities of the EDP Group shall provide training about the Global Compliance Program to all their employees, with an adequate periodicity, so that they know and understand EDP's Compliance commitments, principles and rules of action.

C&IC is responsible for promoting communication, dissemination and training on this Policy and other related internal procedures and is always available to clarify any doubt. The communication and training to be provided and the respective periodicity must be appropriate to the function of each employee and respective exposure to Compliance risks. It shall also be ensured that the training plan is in line with any updates to this Policy and related procedures, in order to ensure the employees constantly updated knowledge.

e. Contact and whistleblowing channel

EDP Group provides several channels for contacting and whistleblowing reports (identified in Annex I of this Policy) and encourages all its employees to report any type of behavior that, in good faith, they consider to be in violation of this Policy, the Code of Ethics of the EDP Group, the law, regulations, policies and procedures implemented by the EDP Group.

The reporting of situations of non-compliance shall be carried out through the channels mentioned above, so that they are properly dealt with, avoiding the exposure of employees and third parties to unnecessary risks or situations not compatible with the regularity of the EDP Group's activities. Employees shall not, on the one hand, refrain from communicating situations that they consider irregular, and on the other hand, must not individually and directly take any actions aimed at the hypothetical repression of irregular practices.

The reporting channels allow for the safe submission and follow-up of complaints, guaranteeing their independence and impartiality, integrity and conservation. The complaint may be filed anonymously. In any case, the information contained in the complaint is confidential and is protected against unauthorized access, guaranteeing the protection of personal data.

The platform that supports the operation of the channel has security mechanisms for all information, also allowing the establishment of two-way communication / interaction with the respective whistleblower, even while maintaining anonymity. A response is ensured to all situations that are communicated.

EDP ensures the protection, non-discrimination and non-retaliation to whistleblowers, employees or third parties, who report inappropriate practices or non-compliance with current policies and procedures. Any acts of reprimand and retaliation against those who make such communications or complaints in good faith and in a substantiated manner will not be tolerated.

Likewise, EDP will not tolerate any act of reprimand, retaliation, discrimination or disciplinary action against anyone who refuses to engage in a certain activity for reasonably considering that it involved the risk of illicit practices (for example, corruption, undue receipt or offer of advantages or other illegal acts repudiated by this Policy and associated procedures.

Any action in this regard must be reported through the available whistleblowing channels and will be subject to disciplinary action, in accordance with the law and with EDP's internal policies.

C&IC monitors the complaints related to the practice of illegal acts in the scope of this Policy, in order to ensure the identification and mitigation of risk situations and, to this end, the areas responsible for receiving these complaints should inform C&IC of their occurrence. On the other hand, C&IC shall

- (i) ensure the analysis and, when justified, investigation of all situations of non-compliance or misalignment with this Policy that it becomes aware / that are reported to the C&IC and about which any reasonable indication of suspected noncompliance is raised and
- (ii) (promote the development of appropriate corrective actions, under the terms defined in the following section.

f. Monitoring

Continuous Improvement and report C&IC is responsible for promoting appropriate mechanisms and procedures for monitoring the Global Compliance Program, and must also monitor the respective development, including in particular:

- i. Monitoring relevant legislative changes with an impact on the EDP Group;
- ii. Monitoring the adequacy of risk identification and assessment methodologies, policies, procedures, and control mechanisms, promoting updates as deemed necessary;
- iii. Monitoring communications of irregularities/whistleblowing reports associated with this Policy and related procedures;
- iv. Monitoring of the effective implementation / operationalization of the control procedures and mechanisms.

When it becomes aware of situations of non-compliance or misalignment with this Policy, the C&IC shall, namely:

- i. Analyze the situation, namely trying to determine the respective causes and consequences;
- ii. Ascertain the possibility of triggering immediate mitigating actions;
- iii. Determine the possibility of similar situations occurring in other circumstances;
- iv. Identify the necessary corrective actions so that the situation does not occur again in that or any other circumstance;
- v. Promote the implementation of corrective actions, proposing the adequacy of existing procedures and controls, if necessary;
- vi. Ensure the monitoring of the implementation of the corrective actions identified.

C&IC ensures the reporting to the EBD and the Commission for Financial Matters / Audit Committee (“CMF / CAUD”) of EDP’s General Supervisory Board (“GSB”) of the monitoring and continuous improvement activities carried out.

g. Audit

The Internal Audit Global Unit ensures that internal audits are carried out in specific areas of the Global Compliance Program, assessing the Group’s risk management, control and governance processes independently, objectively and systematically, in order to identify deviations and opportunities for improvement in the design and effectiveness of the company’s processes.

Internal audits are planned at regular intervals based on a pre-identified risk map and focus of interest.

When deemed pertinent and / or due to specific events, audits may be requested from specialized third parties in order to obtain an external view of a specific topic or of the Global Compliance Programs itself.

iv. Annual declaration of compliance with the principles of integrity

Decision-makers and all Employees who fit the definition of PEP or equivalent must, by the end of the first quarter of each year, by submitting a declaration created for the purpose, confirm, if true, that, throughout the previous year, were aware of and have complied with, within the scope of the activity carried out at the service of EDP, the provisions contained in this Policy, having carried out their duties with integrity, in a transparent manner and in accordance with the legal provisions in force.

v. Failure to Comply with the Group Policy and Applicable Law

Failure to comply with this Policy will have the disciplinary consequences provided for in the Collective Bargaining Agreement and in the applicable labor legislation, and may, in the limit, result in dismissal. If applicable, non-compliance also gives rise to reports to the competent authorities, for the purpose of determining the criminal, administrative, civil or other liability of the agents, which, in turn, may determine, namely, the condemnation of those involved in the payment of damages or fines, while serving a prison sentence, or banning the exercise of activity, restricting the receipt of loans, subsidies or public incentives, loss of assets, dissolution of the company, among others.

It should be noted that these penalties may apply to both natural and legal persons when the law so provides.

Any criminal or administrative liability of the EDP Group entities will not exclude the individual liability of natural persons who hold directorial, management or supervisory positions, representatives, employees or other workers, whether permanent or occasional.

In applicable and contractually foreseen situations, non-compliance with the principles of this Policy by persons or third parties with whom the EDP Group companies relate (suppliers, service providers, customers, beneficiaries of sponsorships and donations, business partners, associates or others) may result in the suspension of the contractual relationship or in the termination of the respective contract.

7. FINAL PROVISIONS

Any question regarding the interpretation or the application of this Policy and related procedures should be directed to C&IC, which will provide advice on the most appropriate

way of acting. C&IC is responsible for reviewing this Policy every two-years or whenever there are relevant changes to the legal framework and the context of the Group's activities and also when new elements emerge that demonstrate its non-integral adequacy, submitting the change proposals to the approval of the EDP's EBD.

Executive Board of Directors

11/01/2022, and updated 25/10/2022 and 23/05/2023

APPENDIX I – Contacts Whistleblowing channels:

- i. Speak Up Channel: <https://www.edp.com/pt-pt/sobre-nos/edp/speak-up>
- ii. Speak Up Channel – Anti-Money Laundering:
[https://portaletica.dig.corp.edp.com/PortaldeEtica_SitesCorporativos/Disclaimer.aspx? Guid=16364884-4f95-44c0-ae85-f7ae0b5f1283](https://portaletica.dig.corp.edp.com/PortaldeEtica_SitesCorporativos/Disclaimer.aspx?Guid=16364884-4f95-44c0-ae85-f7ae0b5f1283)
- iii. Data Protection Officer channel: - E-mail address: dpo.pt@edp.com

C&IC Contacts: E-mail address: compliance@edp.pt Phone: +351 210 012 106

