

EDP Group Code of Ethics

# Our Energy



# Our Energy

## 1 Personnel in charge

**Preparation:**  
Ethics & Compliance Officer.

**Approval:**  
Ethics Commission, Executive Board of Director (EBD) and General Supervisory Board (GSB).

## 2 Review and update

The approved Code of Ethics, including annexes A and B, replaces the EDP SA, EDP Renewables and EDP Brasil Codes of Ethics from 2022.

The Code of Ethics is reviewed every two years, notwithstanding the fact that, if warranted.

Note: the online version, available only to EDP Group employees, may include specific changes deemed appropriate from a user experience perspective, without prejudice to the prevalence of this document in the event of any discrepancy. These changes will be considered in each periodic or extraordinary revision of this document.

## 3 Dissemination

The Code of Ethics is released on the various EDP Group companies' institutional websites and made available online through their respective internal networks.

The Code of Ethics is published in Portuguese, English and Spanish. Should there be any discrepancy in interpretation between this text in Portuguese and its translation into another language, the original spirit of the text written in Portuguese should prevail.

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# Message from the CGSB and Chair of the Ethics Commission

Ethics Codes have become indispensable tools for the most responsible companies in their relations with employees, investors, administrative authorities, regulators, suppliers, and partners. In the case of EDP, as a publicly traded company operating in more than twenty countries, the Code is, above all, a privileged means of communicating our values and corporate culture.

It is clear that ethics at EDP is a heritage of all those who work here: no Code of Ethics is effective if it is not shared, if we do not all see ourselves in its fundamental principles, if we do not recognize them in the behaviors and attitudes of the most senior employees or the most inspiring leaders. Ethics is not simply defined top-down, nor can it be merely the result of high-level, general, and abstract codification. The principles and rules presented here were designed for reasons of clarity, predictability, and security, but always assuming that we all intimately adhere to their substance, with these or other equivalent formulations. These are our standards of relationship, it is about shaping a demanding work and business environment in terms of the rights and duties of a balanced and healthy professional ecology. It is also about explaining to the communities where we operate and the external agents with whom we interact what they can expect from us, as well as what we also demand from them.



Chair of the General and Supervisory Board and Chair of the Ethics Commission  
António Lobo Xavier

Our Code of Ethics has behind it a great aspiration for clarity and detail: EDP wants to provide, in addition to a statement of mission and values, a list of policies, conduct standards, and processes aimed at professional performance, covering areas such as employee behavior, the prevention and rejection of harassment and discrimination, as well as issues of conflicts of interest, confidentiality, and the protection and defense of the company's assets. We sought to establish a set of standards appropriate to a Group with the size, internationalization, and social responsibility of EDP, with the concern of being clear about the consequences of violating these values, policies, or processes, ensuring effective and safe instruments for reporting, investigation, and obtaining fair and transparent decisions. On the other hand, we are well

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aware that we will only achieve our goals with careful communication and regular training provided to employees and partners.

Finally, I would like to leave a personal note. I have more than a decade of experience as responsible for corporate ethics in publicly traded companies. I do not want to seem condescending, but I cannot fail to congratulate the teams working in this area, as well as all employees in general: what we do at EDP, together, in terms of ethics, is certainly at the highest level of what can be observed among our peers. This is an unmistakable source of pride and gives us the encouragement to improve even further in the future.



# Message from the CEO

Energy stands at the heart of global progress and development. As economies grow, industries expand, artificial intelligence unfolds, and geopolitics dynamically shape the global agenda, the energy sector faces a range of critical challenges. The urgent need to reduce carbon emissions and ensure energy security and affordability adds further complexity. As individuals, we also face increasing pressure that threatens our physical and mental well-being, driven by the demands of fast-paced environments and constant connectivity.

To navigate these challenges successfully, organizations must uphold strong values and foster a solid ethical culture. At EDP, ethics and integrity must be at the core of everything we do.

The fact that EDP has been recognized by the Ethisphere Institute as one of the world's most ethical companies for more than a decade is a testament to our commitment and shows that we are succeeding in it.

Our Code of Ethics has now been updated, emphasizing the key principles that must guide us to always act with integrity and make the right choices for the right reasons. It provides clear guidance on how we should approach every decision, identifies specific risks and ethical challenges we may face in our business, and includes concrete examples of how these can be resolved.



Chief Executive Officer  
Miguel Stilwell de Andrade

The Code also reminds us that in the event of suspected breaches of its principles or guidelines these situations should be reported through the Speak Up channel, with a guarantee of confidentiality and non-retaliation for those who do so.

I urge you all to embrace and adhere to our Code of Ethics to uphold the highest ethical values and compliance standards at EDP, choosing every day to follow the right course. Together, let us choose integrity, lead by example, and build a legacy we can be proud of – today and for generations to come.

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# Message from the Ethics and Compliance Officer

Throughout its history, the EDP Group has promoted a strong ethical culture based on values that guide how we act, decide, and relate. Our Code of Ethics, implemented more than a decade ago, has been a guide to action and an essential pillar in consolidating this culture, promoting integrity, respect, and responsibility.

This revised and updated version seeks to reflect the transformations in the contexts in which we operate, social changes, and the emerging ethical challenges. More than a necessary update, this process reinforces our ongoing commitment to transparent, fair, and responsible conduct, keeping us up-to-date and aligned with the highest standards of conduct.

More than a set of guidelines, the Code of Ethics is a tool that strengthens our culture of integrity and supports us in making decisions aligned with the values we share. It is essential that each of us, regardless of our role, understands, integrates, and applies these principles in our daily activities, thus promoting an environment of trust and collaboration. Ethics is not just a distinctive element in the market but what allows us to build lasting relationships with our stakeholders, in particular, and with society in general.



Ethics and Compliance Officer  
Rita Sousa

I also remind you that the EDP Group has a strong commitment to promoting a safe environment where everyone can “speak up” about any ethical concerns or possible violations of current regulations without fear of retaliation.

I encourage everyone to take a moment to carefully read this new version of the Code of Ethics, reflecting on its importance in the context of our daily activities. The Ethics & Compliance area is always available to clarify doubts or support in resolving any situations that may arise.

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# Our identity...

EDP is a company present in all stages of the energy sector the value chain and in four strategic regions – Europe, North America, South America, and APAC (Asia-Pacific).

The company's vision **is to lead the energy transition to create superior value for all.**

EDP's transformation in recent years into a more global, inclusive, and future-focused company, emphasizing sustainability, innovation, and social responsibility, is now reflected in its image and brand signature '**We Choose Earth.**' This claim gives voice to this change and aims to mobilize the entire society in this urgent and necessary transition.

At EDP, we anticipate goals and have very ambitious commitments to the planet, combating climate change, and leading a fair and inclusive energy transition: **being coal-free by 2025; having 100% renewable production by 2030; and achieving zero greenhouse gas emissions across the entire value chain ('NetZero') by 2040.** EDP's position is very clear: we are a brand that chooses Earth

in our words, decisions, and actions, and we act accordingly with concrete actions: we walk the talk, meaning we communicate what we do after making it happen.

For EDP, leading the energy transition is not a trend – it is our purpose: **our energy and heart drive a better tomorrow.** This narrative, aligned with the business vision, refers to a common DNA shared



by all those who are part of EDP and clearly translates who we are, how we operate, and what impact we want to have on the world. At EDP, our "Why" is well-present in the purpose: **working for a better tomorrow.**

# ...and main ethical commitments

The future we aspire to is undoubtedly based on sustaining the company on **key values**, on a unifying purpose and also on the existence of a strong Code of Ethics, a fundamental pillar of **OUR ENERGY!**

And, this purpose is not only technical and economic, but above all an ethical commitment, which materialize in a company...

## 1

... which is **people-centred**, the “heart” of its strategy, ensuring their complete well-being, namely by promoting a culture of respect and acceptance among all and at all stages of their life within the organisation; of freedom to intervene without fear of retaliation; of constant attention to physical and mental health; of encouraging the development of knowledge and the achievement of new skills; of ensuring the most appropriate practices of flexibility at work and the possibility of a good balance between working time and leisure time.

## 2

... that promotes and practices **relationships of trust** with its stakeholders, acting to continuously improve economic and social results, sharing value with employees, shareholders, customers, suppliers and communities, respecting competition and combining social and environmental responsibility concerns. Always with the awareness that a stronger and serious cooperation allows us all to achieve better effects.

## 3

... that consistently works and with a strong sense of urgency and anticipation to lead the profound **transformation of the energy sector** that is underway, committing to audacious decarbonisation goals and the achievement of a fair, inclusive and innovative energy transition, supported by the always responsible use of technology.

## 4

... which maintains a strong commitment to **compliance with internal and external policies** and standards, ensuring compliance with applicable laws and regulations in all jurisdictions in which it is present and maintaining robust internal mitigation systems for the prevention and monitoring of possible infringements.

# Leading with Responsibility

Ethics is one of the fundamental pillars of human activity and, consequently, of business activity. At companies, all of us are assigned the role of making Ethics come alive in our daily actions, but leaders, at any level, have a special mission – being the ones who manage teams, who feed them with competence, guidance and inspiration – which translates into a strong responsibility for the promotion and dissemination of the ethical culture.

This means that leaders are responsible for disseminating EDP's values and its Purpose in day-to-day decisions and through their essential knowledge of the Company's corporate ethics policy, as well as the standards of behaviour that enable everyone to "do the right thing" and, above all, by their example, give the appropriate signals in building the desired organisational culture.

The context of profound social, cultural and geopolitical changes that society is facing entails new challenges for leadership, which we recognise at EDP and on which we seek to ensure the best management, mainly through:

- the understanding of expectations of younger generations with regard to social and environmental responsibility;
- the creation of a healthy environment in which people feel comfortable sharing experiences and reporting less ethical behaviour that they observe;
- the valuing of the richness resulting from the diversity of teams;
- the creation of mechanism that ensure, on the whole, physical and mental wellbeing, that allows people to evolve in a positive way and make their valuable contribution to the organisation, helping to strengthen the ethical culture.
- the ability to listen and understand the concerns reported, creating the conditions for psychological security at all times.

Also, the challenges posed by the technology revolution – new systems, their potential and their risks, as well as the demands for new digital skills – and by significant changes in the world of work – hybrid work, new forms of contractual relationships, generational diversity, among others – place unprecedented performance demands on leaders.

In view of the more demanding expectations placed on companies to develop ethical and responsible businesses and for management to be effective, it is essential that leaders are open to the world and to the multiple ongoing transformations, humane, able to listen and advise, honest, fair, transparent, builders and promoters of a culture, intolerant of ethical violations.

At EDP, awareness of this demanding behavioural standard is clear, and we seek to support people in their preparation so that they can exercise their leadership roles exceptionally well.



# A Code for everyone...

This Code is applicable to all entities that are part of the EDP Group, to the respective members of the corporate bodies, employees, service providers acting on their behalf or in their interest, directly or indirectly, regardless of the nature or form of their legal relationship with the respective entity, always in strict compliance with the applicable legal framework 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 Code is also applicable to Fundação EDP, Fundación EDP, and Instituto EDP – which, for the purposes of this Code, will be considered part of the EDP Group – to their respective employees and service providers acting on their behalf.

The representatives of the EDP Group who are part of the management bodies of the controlled companies, whether based in Portugal or abroad, are responsible for adopting the necessary measures and carrying out the actions required for the transposition of this Code.

On the other hand, the representatives of the EDP Group in joint ventures or in companies where the EDP Group does not hold a controlling position will ensure compliance with the provisions of this Code in the performance of their duties and will encourage the application of its principles or similar principles in those companies, namely through the promotion of the development of specific codes, policies, or procedures for this purpose.





# ...which guides and holds us accountable

The Code of Ethics is an “action guide” reflecting the way EDP believes one should work, therefore its enforcement is inevitably mandatory. Thus, employees who fail to comply with the provisions of this Code are subject to disciplinary action under the legal and regulatory terms applicable to the infractions committed. Suppliers to whom the Code is applicable will also be subject, in case of non-compliance, to the measures or sanctions contractually established or arising from the evaluation and qualification procedures in force at EDP.



The Code is also not a substitute for the Policies, Procedures and other internal documentation existing in each specific area of EDP's activity, but is, in general, a good basis to for supporting them.

On the other hand, the Code does not cover all the situations that may arise when making a decision making that could be considered of an ethical nature. It does not provide us with all the answers, nor is it

supposed to, and cannot replace the careful judgement and common sense of all those who work at the Company. The Code is a guide that, by indicating privileged ways of choosing and acting, aims to help us understand sensitive or less common situations and to reject unacceptable practices, regardless of the context and other people's perceptions.

Faced with a difficult decision situation related to our way of acting within the context of the Company, the following steps should be followed:

## Stop to think

whether the situation at hand does indeed constitute an infringement of the Code and how it can be addressed.

## Cautiously reflect

on whether the approach that has been identified is consistent with maintaining the culture of integrity, transparency and trust that EDP promotes and what kind of consequences it may bring about.

## Ask questions and ask for help

from the management or other responsible persons or, if necessary, from the Ethics & Compliance Officer. In this Code, in “We give everyone a voice” of each topic, the channels to which we can resort to are mentioned.

# We give everyone a voice

At EDP we believe that speaking openly about the concerns we have that relate to the way we act in the workplace is crucial for creating a good environment and for the commitment and empowerment of each one of us, which is essential to the performance of excellence that EDP pursues. This openness in addressing concerns or even complaints must be adopted with all stakeholders, for the sake of transparent, upright and constructive relationships.



A **frank conversation** between the parties decisively contributes to increasing the psychological security of both individuals and teams and that its effect on results is, for employees, differentiating. However, if such a conversation is not enough, and we are faced with an experience or observation of behaviour that we believe to be in conflict with the Code of Ethics we must report it. The **report** must be comprehensive, and based in good faith; a report made in bad faith or of a slanderous nature will not be accepted and may even constitute a disciplinary offence, under the terms and for the purposes of the applicable laws and regulations.

It is desirable that the concern, request for information or claim, where employees are concerned, can be resolved through their management. Leaders have a special responsibility in listening to these concerns and acting on them, and this is a path that should be followed as it strengthens trust among everyone. However, and where this is not possible, employees – and other stakeholders likewise – may refer directly to the **Ethics & Compliance Officer** or report their concern or claim at the [Speak up channel](#).

Through the channels available for this purpose, reporting will follow a **robust, effective and efficient management process**, supported by an independent governance model – which includes the Ethics Commissions of EDP and EDP Renováveis, and the Ethics & Compliance Officer – where the confidentiality of whistleblowers is fully ensured. All reports may also be made anonymously. This process can be found in detail in the Whistleblowing Management Policy.

Committee of the General and Supervisory Board also receives aggregate summary information on the cases involved that are deemed appropriate by the Ethics Commission. This process can be found in detail in the [Whistleblowing Management Policy](#).

The obligation of “**non-retaliation**” is an essential aspect of the process for reporting potential breaches of the Code of Ethics. In fact, EDP prohibits any form of reprisal – overt or subtle – against anyone making a report and considers that retaliation is itself a breach of the Code of Ethics and may be subject to disciplinary action. Retaliation against an employee who signals a potentially ethical situation damages the Company’s trust and reliability; on the other hand, this act may also expose the Company to serious legal risk.

**At EDP we believe that the freedom to report unethical conduct, based on the essential principle of good faith, is an essential component of an open organisational culture, where employees feel supported in doing the right thing.**



# Let's make the way for OUR ENERGY!

The Code of Ethics is inspired by **EDP's Purpose** and is built on its identity. We describe this identity under four “traits” that describe the way in which we act in the Company; each of these “traits” contains the themes that are very relevant to EDP and, on each of them, we talk about the reason for their choice and the behaviour that we must follow, or not follow, in order to ensure consistency of action throughout the organisation.

We illustrate some of these behaviours with situations from our daily life at the Company because, in the end, Ethics is nothing but action. The behaviours and examples indicated are obviously not exhaustive, but represent the essence of the way we want to operate and be recognised by all stakeholders.





## A Company focused on People

- 1.1 Employee Well-being
- 1.2 Health and Safety
- 1.3 Company Representation
- 1.4 Diversity, Equity, Inclusion  
and Belonging
- 1.5 Harassment
- 1.6 Human and Labour Rights

# 1.1

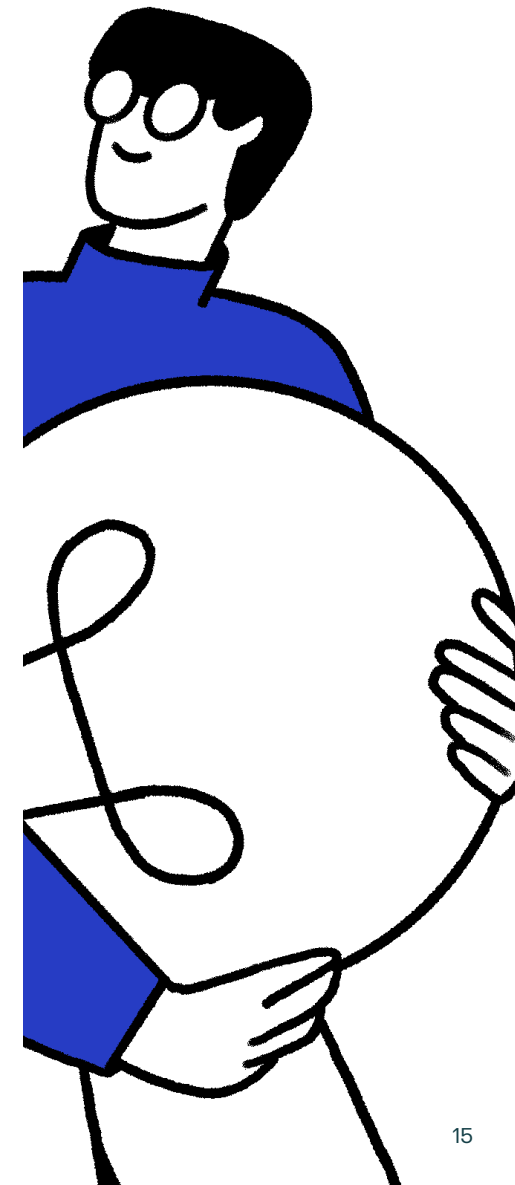
## Employee Well-being

EDP believes that well-being is fundamental to the good performance of the organization, its teams, and each one of us. Therefore, it places people at the center of all its decisions, listening to them and taking care of their well-being, as this is the only way to promote a balanced and healthy work environment.

In this regard, EDP has sought to adapt and create measures according to the needs of its people and the current context. Based on a culture of active listening, it implements a global strategy aimed at promoting physical, emotional, social, professional, and financial well-being.

Therefore, in addition to strict compliance with labour legislation applicable in the jurisdictions in which the Company operates and firm protection of employees' privacy.

EDP ensures policies and practices that involve everyone, with no exceptions, so that **each person feels part of the company as a whole**. It is also important to remember that it is up to all of us, and in particular each of us, to **find ways to live our values at work and to build good relationships and good atmosphere in the work context**, with leaders having a special role in creating an environment in which people can thrive.



## We must

01. Recognise and experience EDP's Purpose, by becoming aware of the importance of the individual contribution to the whole and building together an environment of trust, responsibility and mutual respect.

02. Actively seek professional development that contributes to the continuous updating of core competencies, making the best use of the opportunities provided by EDP.

03. Promote a workplace where everyone is available to speak openly when they believe something is not right, without fear of any form of retaliation, contributing to a transparent and trustworthy organisation.



04. Invest in work-life balance, acknowledging the importance of individual wellbeing for a healthy, balanced work experience, taking advantage of the new flexible working models and other opportunities that EDP offers.

05. Ensure psychological safety so that everyone feels valued, confident, and encouraged to contribute openly and honestly;

06. Value volunteering as a form of active civic participation.

07. Allow, under the strict terms of the law and applicable internal policies and procedures, provision of mechanisms for employee participation in political processes, which may include monetary contributions on a voluntary and personal basis.

## We must not

01. Tolerate behaviour, even if subtle, that contributes to harming well being in the workplace.

02. Violate employee privacy.

03. Allow actions that do not respect the rights and diversity of each person, and that constitute prejudice or unjustified discrimination.

04. As leaders, prevent, in an unfounded manner, mobility processes, participation in training, well-being and volunteering activities at EDP.



05. Neglect proper care and communication with each of the team members, as well as equity in the distribution of work, namely in the hybrid or remote working models.

06. Ignore tell-tale signs of employee distress, stress or burnout.

07. Expect or demand availability outside of established working hours, respecting the right to disconnect and ensuring the enjoyment of free time without work-related pressures or interruptions;

08. Create or tolerate an environment where employees feel intimidated, silenced, or afraid to express their opinions and concerns.

Question:



My team leader is sometimes quite intimidating. I know they strive to ensure that we permanently deliver quality work, but sometimes the pressure is too much. Is there anything I can do about this?

Answer:

Your manager is expected to challenge and lead the team to deliver the excellence in performance that characterises EDP. This may mean that there are moments of tension. However, a manager is also expected to treat everyone with respect and act with sensitivity. If you feel you are not being treated with respect, we recommend that you try talking to your line manager. Should the situation remain unresolved, you can appeal to the respective P&O Business Partner or, as a last resort, use the Speak up channel. A healthy working environment can only be achieved with everyone's support and involvement.

Question:



A voluntary action was published which I would very much like to participate in; however, as we are close to the end of the year and with high work intensity, my participation in this action may not be well regarded by my management and colleagues. What should I do?

Answer:

Professional obligations must always be taken care of. On the other hand, EDP is known to actively support its employees in the practice of social volunteering. Thus, we recommend that you talk to your line manager and, together, try to find the best solution, which should never neglect your professional responsibilities.

Question:



I am working on a project with collaborators from different geographies and lately the project manager has systematically neglected to schedule the meetings at times that are compatible for all the teams, which has caused some discomfort. It is my understanding that the teams have sacrificed their schedules and personal lives in order not to miss the meetings. I know that the project is very important for EDP, but I don't think it is a fair attitude. What should I do?

Answer:

Whoever is appointed to manage a project is expected to deliver the respective tasks on time and with quality; however, the well-being of all those who are part of the project teams cannot be neglected, which is also the manager's responsibility. With teams working in a hybrid model and distributed globally, it is essential for managers to schedule meetings that respect the time zones of all team members. Therefore, you should talk to the project manager to bring attention to the situation. If the situation is not resolved, you can talk to the respective P&O Business Partner or, as a last resort, to the Speak up Channel.

Question:



Because I am supporting my increasingly dependent parents, I would like to have more flexibility in my work. However, I am concerned about my future career advancement opportunities. Who should I seek for advice?

Answer:

EDP supports work flexibility, both spatial and temporal, and is recognized as a Family-Responsible Company (FRC). Your choice for more flexible work arrangements should not hinder your professional advancement. You should address your questions on this topic to your hierarchy or the respective P&O Business Partner.

Find out...



## Related information

[We put well-being first](#)

[Family-Responsible Company Certification](#)

[Internal Mobility Policy - Local and International](#)

[Volunteer Policy](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Whistleblowing Management Policy](#)

Intranet Area Dedicated to...

[Wellness](#)

[Flexibility & New Ways of Working](#)

[Volunteering](#)



## We give everyone a voice

Management

P&O Business Partner

Ethics & Compliance Officer

[Speak up Channel](#)

## 1.2 Health and Safety

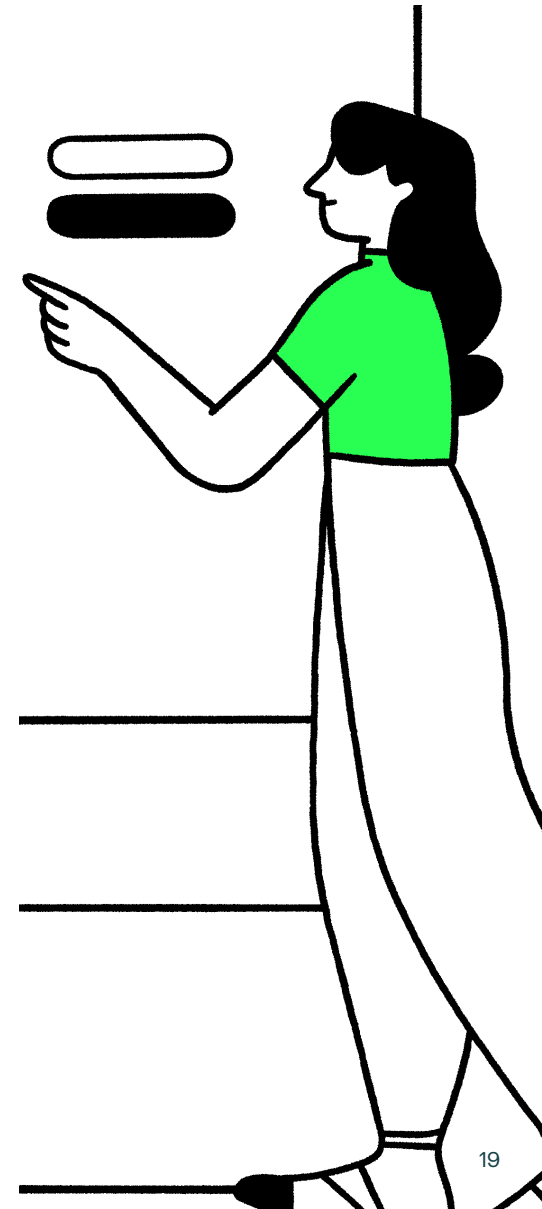
The Health and Safety of everyone, employees and suppliers alike, are fundamental issues for EDP.

As far as Safety is concerned, the Company aims to **achieve “zero accidents”** and at the same time is constantly concerned with putting people's well-being before any operational need. No situation or urgency of service can justify endangering the life, physical integrity or safety of anyone.

Based on the reinforcement of a vertical culture of prevention and safety, EDP promotes the training and information of all employees on the risks inherent to activities and protects the facilities and equipment by adopting the best techniques, combined with the monitoring and updating of work procedures. **The importance that EDP places on the topic of Safety extends to the supply chain**, in particular to all service providers acting on behalf of EDP or working on its premises, and goes beyond compliance with legal imperatives, in all the companies and jurisdictions in which it operates.

EDP has been strengthening its attention to the health of its employees, designing a “Global Well-Being Strategy”. The goal is to create or strengthen, through various initiatives, the conditions for each employee to benefit from a **complete state of physical, mental and social well-being**. Healthy life practices are, thus, encouraged and supported in all contexts, with the Company continuing to provide its employees with supplementary protection and medical assistance.

The excellence required in these two areas can only be achieved with the involvement and accountability of all levels of management and with the support and contribution of all employees, suppliers and other stakeholders.



## We must

01.

Ensure that everyone, including suppliers, in particular those acting on behalf of the Company, comply with health and safety standards and practices in accordance with current legislation and regulations.

02.

Ensure the continuous reinforcement of a safe, healthy and productive work environment, namely through actions of awareness raising, training and sharing of good practices.

03.

Monitor and evaluate risks and incidents.

04.

Report any non-conformity detected, as well as the observation of incidents, whether accidents or near misses.



05.

Take permanent precautions in order to avoid putting ourselves or others at risk, whatever the circumstances.

06.

Be aware of the procedures applicable in the event of an emergency.

07.

Exercise the right of refusal in case of unsafe conditions for carrying out the activity.

08.

Be alert, to ourselves and to others, to signs of physical or mental exhaustion, such as persistent tiredness, difficulty in concentrating, memory failure, insomnia or excessive sleep, anguish, anxiety or irritability, among others. In these cases, use EDP's existing support lines and other resources to seek help for ourselves or for others.

09.

Really disconnect from work when enjoying time off.

## We must not

01.

Fail to apply the same security principles, policies and procedures in all activities and with all partners.

02.

Disregard strict compliance with the Company's health and safety objectives.

03.

Neglect the active and continuous promotion of physical and mental health, namely by not taking advantage of Company benefits and initiatives regarding physical, mental and social well-being.

04.

Ignore signs of stress, anxiety, or other mental health issues, both in ourselves and in others.



05.

Ignore the importance of rest and recovery, which are essential for maintaining health and safety at work.

06.

Tolerate or ignore behaviors that compromise safety, health, or violate the company's ethical principles.



## Examples

### Question:



On occasion I have noticed that on an EDP site some of the stipulated procedures were not being followed. The work has nothing to do with me directly. Should I report this?

### Answer:

Safeguarding compliance with applicable procedures, in particular, those relating to legal obligations and health and safety at work, as well as the Company's image, is everyone's responsibility, regardless of their area of activity. You should report promptly using the appropriate channels. In the event of imminent serious risk, the work should be stopped immediately by the bystander. All EDP employees, who have the knowledge and training for this purpose, also have the duty and autonomy to interrupt any work being carried out by their own teams or by service providers when the appropriate safety conditions for performing it do not exist.

### Question:



I have noticed that a colleague has been increasingly apathetic and struggling to concentrate, which has hampered the team's work. I have asked him on several occasions if he is having any personal problems, but he insists that everything is fine. I'm worried; What am I supposed to do?

### Answer:

Indeed, these can be signs, albeit subtle, of depression. Having already insisted with your colleague, you should inform your superior so that he/she is aware of these signs and can act accordingly, namely by resorting to psychosocial support lines.

### Question:



An external consultant on a long-term project is showing evident signs of physical fatigue, sadness, and seems to be depressed. I have already spoken with him and know that he is temporarily living with his father, who has a prolonged illness, which leaves him without enough rest and very worried about the progression of the illness. I also know that he does not want to alert his company about his family situation for fear of being removed from this EDP project. His condition has not affected the work at EDP, but I am concerned about his physical and mental health and the team's performance in the near future. What should I do?

### Answer:

It is important to act proactively to ensure the consultant's health and well-being, as well as the continuous performance of the team. You should encourage him to seek mental health support, either within his company or externally, and if this does not happen, you should speak with the project manager of the consulting company to alert them to this situation.

## Find out...



### Related information

[Health and Safety Work Policy](#)

[Code of Conduct for EDP Suppliers](#) [Whistleblowing](#)

[Management Policy](#) [Intranet area dedicated to](#)

[Prevention and Security](#)



### We give everyone a voice

Management

Responsible for the Prevention and Security Areas of Business Units

Ethics & Compliance Officer

[Speak up Channel](#)

## 1.3 Company Representation

The performance of each one of us and the way we communicate, as employees, proxies, authorised representatives or service providers with powers to act **on behalf of EDP**, in formal or informal representation, may influence EDP's image and reputation.

It is therefore essential to be aware of the impact of everything we do and say, in public spaces, whether physical or virtual, and even in private or more reserved forums where information about EDP is shared, especially when the name and the activity of the Company are involved, since we are inevitably EDP's ambassadors.

New technologies are radically changing the way we communicate, both at corporate and individual level. Social networks, for example, as digital public spaces, can increase the sense of belonging and help create collective knowledge. However, acting

and interacting in online communities, sharing information, ideas, interests, personal messages and other content, makes it difficult to dissociate our personal image from that of the Company. As such, it is up to each of us to **make a clear distinction between personal opinion and a Company position** and to be especially vigilant about potential manipulation of information, such as fake news, whether or not as a result of the use of Artificial Intelligence.

We are also called upon to **represent EDP with honour and responsibility, valuing its principles and commitments, especially those relating to Ethics and Sustainability.**



## We must

01.

As EDP's formal representative, act within the established limits, to ensure accuracy, integrity, and transparency in all internal and external communication channels.

02.

Act professionally, maintaining a cordial, collaborative, and transparent attitude in relationships with customers, suppliers, partners, and other stakeholders, always safeguarding the Company's interests.

03.

Predict the impact of our statements, especially outside EDP, always bearing in mind the reach that the information may have in the media and social networks.



04.

Distinguish between what is personal opinion and the Company's position.

05.

Ensure that any communication about EDP has been adequately prepared and also cleared by management.

06.

Ensure the confidentiality, privacy, and integrity of the Company's internal information.

07.

To inform management about injurious, false, or misleading information or opinions concerning the Company that we become aware of, namely through contacts received or disclosed in the media or on social networks.

## We must not

01.

Act outside of the responsibilities attributed to us when carrying out specific duties at the service of or when representing EDP.

02.

Speak in public on behalf of EDP, unless duly authorised by management.

03.

React to derogatory or offensive content about EDP, unless we are duly informed and authorised to do so.

04.

Contribute to the dissemination of critical content for the Company through external communication channels, namely social media, by sharing posts (posts, news, etc.) that are potentially false, inaccurate, or misleading.



05.

Adopt, endorse, or legitimize behaviors or positions contrary to the principles upheld by the Company, such as violence, harassment, discrimination, or social exclusion, or any attitude that undermines the dignity of others.

06.

Share internal information on social media or any other external communication channel.

07.

Use EDP resources, such as email or personalised cards, to express personal opinions or promote private projects.

08.

Quote colleagues, customers, partners, service providers or other related parties without their approval.

09.

Under no circumstances, use the EDP brand for particular purposes or for the benefit of family members or other people with whom you have a close relationship.

Question:



In a conversation between friends about media issues, there were subjects that question EDP's reputation mentioned. Should I take part in this conversation?

Answer:

You should present the Company's position on this matter, if you have the knowledge to do so. If you do not have sufficient information, you should refrain from commenting stating that EDP acts with integrity. In addition, you should state that EDP has its own channels for disclosing information as well as for reporting situations that are considered inappropriate.

Question:



I am participating in an important international conference in the sector and over dinner we talked about each of our companies. The following day, I realized that one of the people was a journalist. Although I didn't mention anything confidential, nothing I said was supposed to be on the newspapers. Should I do anything now?

Answer:

When you are at a public event, always bear in mind that everything you do and say, whether at a professional or personal level, can be published in the media or social networks. Contact your manager who will advise you on what to do.

Question:



I found a news article with false or misleading considerations about EDP on social media, which indicates it might be fake news and perhaps even generated using Artificial Intelligence. What is the most appropriate action to take?

Answer:

You should immediately inform your hierarchy. Additionally, avoid responding to or interacting with the post. Your hierarchy can activate the appropriate channels, namely the Company's communication team, to assess the information and its source and take the necessary measures to correct the information and protect EDP's reputation. It is important to remain calm and follow internal protocols to ensure an appropriate and professional response.

Question:



I was approached by a journalist on the sidelines of a public event in which I participated as a representative of EDP, and they want to ask me about a topic related to the Company. Should I respond?

Answer:

Unless it is a request for additional clarification on some more technical or factual information that you presented or discussed at the event, you should avoid answering questions on topics about which you do not have knowledge, responsibility, or direct interaction at EDP. In such cases, you should refer the journalist to EDP's communication team so they can best handle the information request. Additionally, you should inform your hierarchy and the communication team about this context.

## Examples

### Question:

A friend of mine is running for political office. Can I help her with her campaign?



### Answer:

Yes, your voluntary support is a personal decision. However, under no circumstances may you use EDP's resources, including working hours, telephones, emails, materials, the name of the Company or your position in it, to promote the campaign. This includes the use of professional social media where your name is associated with EDP. It is imperative to maintain a separation between your personal and professional activities to avoid any conflict of interest or the perception of any kind of institutional support.

## Find out...



### Related information

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Whistleblowing Management Policy](#)

Intranet area dedicated to...

[EDP on social networks](#)

[EDP Storytellers](#)



### We give everyone a voice

Management

Ethics & Compliance Officer

[Speak up Channel](#)

## 1.4 Diversity, Equity, Inclusion and Belonging

EDP currently has a global presence, integrating diverse people all over the world. we prize and promote this **diversity as a factor that creates value and innovation**, but also as a form of inclusion, which allows, with **fairness**, to open horizons and learn about new realities of overcoming. By promoting a strong perception of affinity, but also of acceptance and appreciation of each individual, we seek to reinforce the sense of belonging.

We acknowledge that **to add differences is to go further**, to bring together points of view and ways of seeing the world, to integrate all dimensions, to be inclusive in a conscious way, namely through profiles, paths and experiences that add value and allow us to do what we have to do better.

We actively seek not to be led by any bias, be it conscious or unconscious, and take steps to foster an inclusive culture that makes everyone feel welcome.

**We promote diversity and inclusion, ensuring equal opportunities**, to reinforce equity and a sense of belonging as an employer, which we also encourage with our stakeholders and, in particular, our suppliers.



## We must

01.

Include and respect everyone's diversity.

02.

Reflect on and act upon our unconscious biases.

03.

Act, proactively, as allies who motivate themselves and others to contribute to an organization free from discrimination and/or microaggressions.

04.

Promote mutual respect and equal opportunities in the face of diversity by providing an inclusive working environment free from prejudice and discrimination.

05.

Ensure an environment where all people feel respected and safe in being who they are.



06.

Encourage the inclusion of all expressions of human diversity.

07.

Recognize the importance of knowledge transfer and learning between different generations, in order to preserve organizational culture and stimulate innovation.

08.

Value and protect the uniqueness of each person, to ensure fair and equal opportunities for all.

09.

Ensure that suppliers who act on behalf of EDP are aware of our commitments in this area.

10.

Strengthen the perception of affinity, relationship, acceptance, and appreciation within the organization.

## We must not

01.

Determine nor constrain any type of decision based on discriminatory factors, namely, ancestry, age, gender, sexual orientation, gender identity, marital status, family situation, economic situation, education, origin or social condition, genetic heritage, reduced work capacity, disability, chronic illness, nationality, ethnic origin or race, place of origin, language, religion, political or ideological beliefs, trade union membership, or on the basis of job, activity or professional category.

02.

Discriminate, including in the recruitment process or at any other time in the relationship between employees and the Company, such as training, progress, and professional recognition.



# Examples

## Question:

I am about to start parental leave and I am worried about what will happen when I return, namely about my future career development opportunities. Who should I contact for advice?



## Answer:

EDP, namely as an frc – Family Responsible Company, supports employees at the end of parental leave, ensuring their return to the activity for which they were hired. Any questions or concerns on this subject may be raised with your line manager or with the P&O Business Partners of the respective areas. Additionally, EDP has specific policies to ensure that parental leave does not negatively affect your growth and advancement opportunities within the Company.

## Question:

I frequently hear that diversity is important to the Group. Does that mean I should favour the hiring or promotion of people with disabilities or people from ethnic minorities or other groups that are often discriminated against?



## Answer:

No, that's not what is expected. At EDP, we hire on the basis of candidates' skills and experience and so you must select or promote according to these criteria, without prejudice or discrimination.

## Question:

When preparing to set up the internal team for a new project, I suggested including two colleagues with many years of experience at EDP and with much experience of the matters to be dealt with in the project. However, I was told that in view of their age it might not make much sense to include them in the team. I replied that, on the contrary, this would be an excellent opportunity to value their experience and retain knowledge in the company before they retire. Does it make sense for me to insist on this suggestion?



## Answer:

Your proposal makes perfect sense, and you must insist on it. This is in fact a good inclusion measure that not only values the knowledge that employees have accumulated in the Company, now allowing them to apply it to a new project but will also certainly make them feel that they "belong" to EDP, which is very important to maintain or increase their well-being. Age is just a reference that does not translate the real capacity, either physical or intellectual, of people, who presently have, in general, a much greater healthy and active longevity. Additionally, involving experienced employees in new projects can serve as mentorship for younger team members, facilitating knowledge transfer and strengthening organizational culture.

## Question:

My team is currently composed of people aged between 25 to 60 or older. I am convinced that the younger members have not been well received by the older ones, who are witnessing the replacement of colleagues/friends by young people who, in turn, do not value the knowledge of the older ones, which has caused some discomfort in the team. I have read about ageism, but I am not sure if any of these situations are actually age discrimination and if I should report them.



## Answer:

At EDP, we promote generational diversity and value the exchange of experiences between people of various generations. If possible, encourage your team to reflect on ageism, which can be understood as the existence of stereotypes (how we think), prejudices (how we feel), and discrimination (how we act) regarding age. You can also talk to the respective P&O Business Partner or report through the appropriate channels to flag the situation.



Find out...



## Related information

[Diversity, Equity and Inclusion](#)

[Whistleblowing Management Policy](#)

[Intranet area dedicated to Diversity and Inclusion and Belonging](#)



## We give everyone a voice

Management

P&O Business Partner

Ethics & Compliance Officer

[Speak up Channel](#)

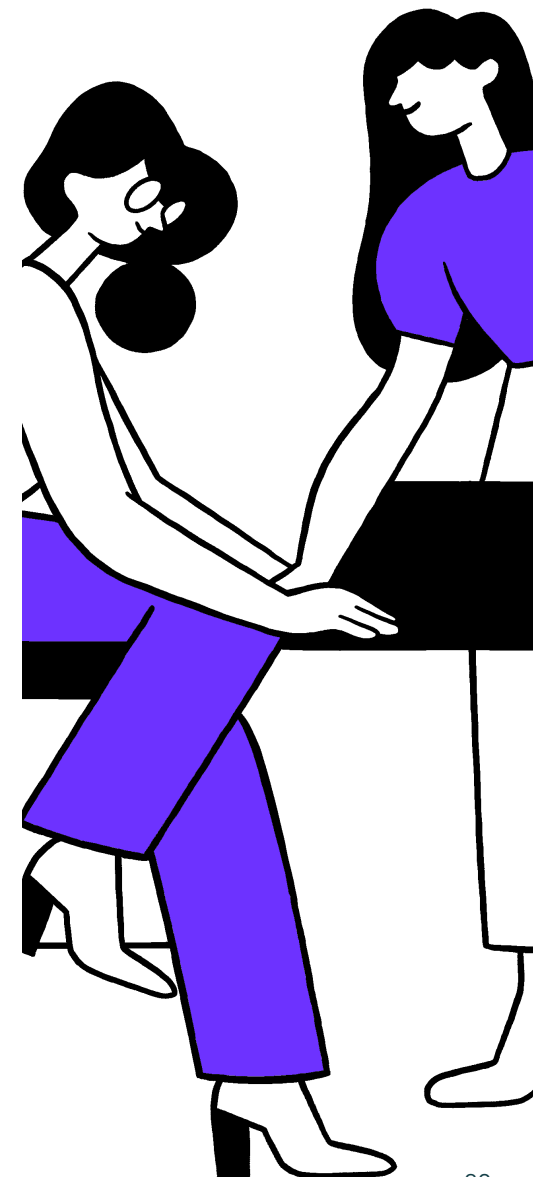
# 1.5 Harassment

EDP promotes a **culture free from any sort of harassment**, understanding this to be systematically undesired behaviour of a moral or sexual nature, in a verbal, non-verbal or physical form, which has the goal or effect of disturbing or embarrassing another person, or affecting their dignity or creating an intimidating, hostile, degrading, humiliating or destabilizing environment.

Moral or sexual harassment can occur in any strata of society, context or place of work, affecting the person regardless of their ancestry, age, sex, sexual orientation, gender identity, marital status, family status, economic or cultural situation, education, social origin or condition, genetics, reduced working capacity, disability, chronic illness, nationality, ethnic origin or race, territory of origin, language, religion, political or ideological convictions, trade union membership or, in addition, job, activity or category.

**Harassing forms of behaviour in a business context violate the victims' labour rights**, and may affect their value as people and workers, causing harm that can have an impact on their self-esteem, physical and mental health, life project and family relationships.

In addition to the legal obligations to which EDP is subject to, **it is the duty of all workers to prevent, confront and report any and all behaviour that may constitute a situation of harassment**. The duties and/or principles laid down in specific legislation and in internal regulations shall apply to proxy holders, representatives and suppliers.



## We must

01.

Refrain from engaging in any form of behaviour which may constitute harassment at work.

02.

Prevent and combat harassment at work.

03.

Report harassment at work of which we are a victim or witness, through existing communication channels.

04.

Attend the regular mandatory training sessions on harassment.



## We must not

01.

Tolerate any behaviour of moral harassment, such as: systematically devaluing the work of colleagues or employees; promoting the social isolation of colleagues or employees; constantly ridiculing, directly or indirectly, a physical or psychological characteristic of colleagues or employees; setting impossible-to-achieve goals and objectives or unfeasible deadlines; assigning duties inappropriate to the professional category of employees; unjustifiably not assigning any duties to employees; misappropriating ideas, proposals, projects or work of colleagues or employees.

02.

Tolerate any form of behaviour involving sexual harassment, such as: repeating suggestive remarks or comments about co-workers' sexual appearance or orientation; systematically making phone calls and sending unwanted messages of a sexual nature; repeatedly sending sexual gifs, drawings, photographs or images; intentionally promoting unnecessary and unsolicited physical contact or approach; conditioning the hiring, professional progression or any other employment benefit, through unwanted activity of a sexual nature.



# Examples

## Question:



A colleague is being systematically commented on by other colleagues about clothing and other physical attributes, which clearly displeases him. Does sexual harassment necessarily involve physical contact or unwanted touch?

## Answer:

No. Sexual harassment can also be verbal. Words and gestures can be as offensive as acts or physical contact. Inappropriate stories and comments can be considered sexual harassment if they have the purpose or effect of upsetting or embarrassing the person, affecting their dignity or creating an intimidating, hostile, degrading, humiliating or destabilising environment. It is important that any situation of harassment is reported through the appropriate channels so that the necessary measures can be taken to protect the victim and ensure a safe and respectful work environment.

## Question:



A colleague told me that he had been harassed by another colleague. I advised him to make a report, but I know he didn't. Can I do it myself?

## Answer:

In advising your co-worker to report this you took the first correct step. If you believe that this is actually a case of moral harassment, you can do it yourself through the appropriate channels. It is important to ensure that all cases of moral harassment are reported to protect the well-being of employees and maintain a healthy and respectful work environment. EDP takes all harassment reports very seriously and has procedures in place to investigate and handle these situations confidentially and impartially.

## Question:



A colleague from my team made a report about inappropriate conduct. I have noticed that this colleague is being retaliated against for making the report. What should I do?

## Answer:

Any form of retaliation against the employee is unacceptable. All forms of retaliation—whether overt or subtle—against any employee, regardless of the nature of the report, are prohibited. Retaliating against a colleague is a serious violation of EDP's Code of Ethics and, in certain circumstances, it also has legal provision and may result in disciplinary measures. Retaliation undermines the trust and integrity of the Company, potentially exposing it to significant legal risks. You should immediately report any act of retaliation through the appropriate channels so that appropriate measures can be taken to protect all employees involved and ensure a safe and respectful work environment.

## Question:



I am often the target, by a colleague, of prejudiced and sexist comments, which naturally makes me quite uncomfortable. What can I do?

## Answer:

First of all, you should talk to your colleague and explain how you feel about the situation, specifically that you are uncomfortable with the comments. If he persists in this attitude, you can speak to your line manager and make them aware of the situation. If there is still no change, you should report the case through the appropriate channels. EDP does not tolerate any form of discrimination or harassment and takes all reports seriously. Additionally, it is important to know that retaliation against those who report such behaviors is prohibited. Reporting these situations is crucial to maintaining a respectful and inclusive work environment for everyone.

Find out...



## Related information

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Whistleblowing Management Policy](#)

### EDP Portugal

[Code of Good Conduct for preventing and combating harassment at work](#)

### EDP Renewables Spain

[Protocolo para la Prevención y Actuación en Casos de Acoso en el Entorno Laboral](#)



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Management

P&O Business Partner

Ethics & Compliance Officer

[Speak up Channel](#)

# 1.6

## Human and Labour Rights

EDP respects and ensures respect for internationally recognised human rights, implementing **management policies and measures that identify, monitor and avoid risks associated with its activity that may affect employees, communities, customers or suppliers.**

Recognizing the importance of addressing the risks arising from the activities of its suppliers and other partners, they must also respect EDP's ethical commitments.

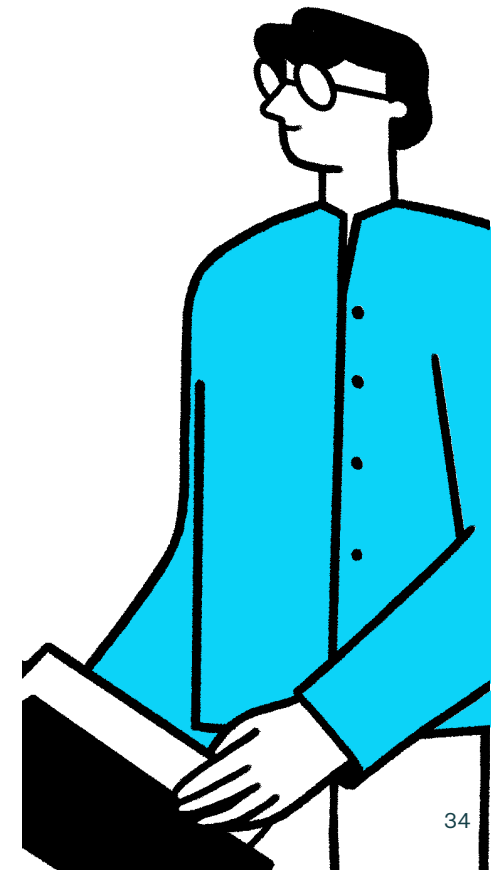
EDP conducts its activity according to the United Nations instruments, in particular the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the specific guidelines for the protection of vulnerable people and groups that aim to eliminate racial and gender discrimination, protect the rights of children and migrants, people with disabilities and indigenous and local traditional communities, while also subscribing to the United Nations Global Compact and implementing the Guiding Principles for Business.

Within the scope of the International Labour Organisation instruments, EDP implements the Tripartite Declaration of Principles on Multinational Enterprises and Social Policy, including the Eight Fundamental Principles and Rights at Work, which aim to guarantee Trade Union Freedom and Collective Bargaining, the elimination of Forced or Compulsory Labour, the effective abolition of Child Labour and any form of Modern Slavery, the elimination of discrimination in Employment and Occupation, respect for the rules on Working Time, the protection of Health and Safety at Work, the guarantee of payment of a minimum wage and the special rights of indigenous peoples and local traditional communities.

EDP's commitments apply to all its decisions, to current operations and investment projects, to projects developed in partnership, and to the relationships it establishes with suppliers, and particularly with those working on behalf of EDP. Through the Human and Labour Rights Policy, EDP defines the organisation of internal processes and assigns responsibilities in order to guarantee the application of due diligence, the mechanisms for consultation and reporting, the obligations of compensation, reporting,

communication and training as well as the extension of commitments to its business relations.

**EDP aims to be a benchmark company in the protection and respect for human rights, pursuing a policy of zero tolerance towards any risk of breach in this area.**



## We must

01.

Respect and comply with the legal and regulatory rules on Human Rights in force in the jurisdictions applicable to the EDP Group, with reference to the principle of the highest requirement.

02.

To ensure the commitments freely accepted in all EDP's areas of intervention, regardless of the level of demand of the national and local legislations, guaranteeing the human and labour rights internationally established by the United Nations and the International Labour Organization.



03.

Ensure compliance with the commitments assumed in EDP's "Declaration of respect for Human and Labour Rights".

## We must not

01.

Participate in or consent, actively or passively, by action or omission, to practices that may constitute any violation of Human Rights, reporting these whenever they may occur.

02.

Accept or collude with any form, even subtle or less obvious, of violation of human and labour rights by third parties who supply products or services to us.



## Examples

### Question:



Someone told me that one of our service providers is under investigation for alleged use of forced labour. The audits carried out never found any reasons for concern. Should I ignore these rumours?

### Answer:

No. You should report it so that consideration can be given to opening an investigation proceeding where information can be requested from the service provider and a new audit can be carried out, seeking to eliminate any suspicion. EDP has a serious commitment to human rights and the well-being of all workers in its supply chains, and it is crucial to ensure that all service providers meet these standards.

### Question:



I have received an invitation to be part of an EDP workers' committee. However I fear that in doing so I may somehow be disadvantaged because I am not sure that this activity is well regarded among my peers and by my superiors. Should I accept the invitation?

### Answer:

Yes, you may and should accept the invitation if you wish to. EDP is in favour of freedom of expression and association, always bearing in mind that this type of structure serves the interests of all employees, taking the concerns of all to decision-makers and is therefore a commendable activity of interest. Participating in a workers' committee is a way to contribute positively to the work environment and organizational culture, and it should not be seen as something negative.

## Find out...



### Related information

[Empowering our communities](#)

[Human and Labour Rights Policy](#)

[Health and Safety Work Policy](#)

[Sustainable Procurement Policy](#)

[Code of Conduct for EDP Suppliers](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Whistleblowing Management Policy](#)



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Management

P&O Business Partner

Those responsible for Service Provider and/or Procurement Management Units

Ethics & Compliance Officer

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## Relationships of Trust

- 2.1 Relationship with Shareholders
- 2.2 Relationship with Customers
- 2.3 Relationship with Suppliers
- 2.4 Relationship with Communities
- 2.5 Competition

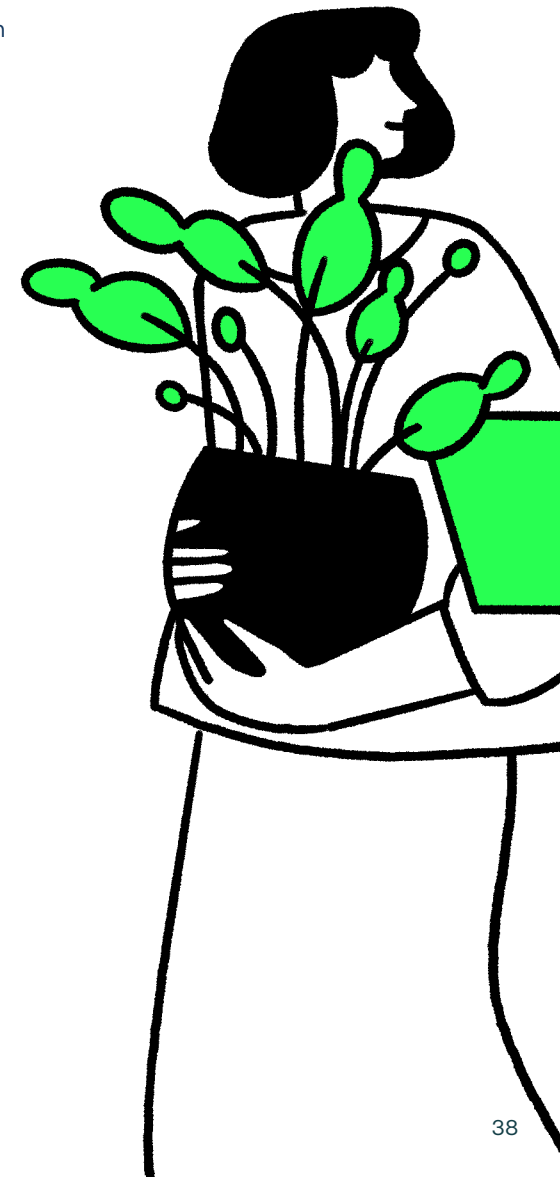
## 2.1 Relationship with Shareholders

EDP is **committed to creating value** for its shareholders.

“Shareholder value” is supported in strategic decisions that influence the sustainability of the Company’s various businesses, excellence in execution and the delivery of solid results according to plan.

Shareholder confidence, decisive for investment in the development of the Company, is thus a counterpart to the crucial choices made, such as the anticipated investment in the massive production and use of renewable energies, together with a robust sustainability policy, materialised in particular through the active contribution of various international commitments in terms of human rights, labour, the environment and the fight against corruption.

In complex and demanding contexts in which factors such as regulation, government policies and the evolution of markets and economies, among others, significantly condition the Company’s performance, EDP honours its commitments to this important stakeholder **through firm action in which integrity and transparency** are also essential.



## We must

01.

Inform the market, in a transparent manner, about the Company's performance, taking into account the legal obligations and the needs of the stakeholders, providing, in the information supplied, qualitative and quantitative elements identifying economic, financial, social, environmental and reputational risks, in a complete and clear manner and ensuring the quality of the information provided.

02.

Provide the market with due knowledge of the existence of any event regarding the company, the disclosure of which is likely to interfere with the respective economic, environmental or social situation.

03.

Establish policies and procedures that ensure the separation of EDP's interests from those of its shareholders.



04.

Respect the principle of equal treatment for shareholders, and for all other stakeholders, providing necessary information in a timely, appropriate, truthful, transparent and accurate manner.

05.

Include the risk of bad ethical practices in the general management of corporate risk, identifying the respective warning signs.

06.

Have systematic knowledge of the expected economic performance of our areas of activity, seeking to contribute actively towards achieving the objectives set.

## We must not

01.

Undertake, under any circumstances, acts that jeopardise EDP's reputation, namely acts related to financial matters, corruption and bribery, conflicts of interest, or use of information and assets.

02.

Fail to challenge the adopted practices, always in a constructive context, as promoting efficiency is of crucial importance.



## Examples

### Question:



I was asked to analyse a possible future investment by EDP in a new region from the perspective of my area. The following day, I was tipped off by a colleague that I would have to give feedback that same day, as the decision was about to be made at the Investment Committee level since the project had an above average return. Should I shorten the procedures, skipping some analyses, in order to give an answer within that period?

### Answer:

No. Any new investment option should be carefully considered. It must always be ensured that all risks, which can be discerned at the time of decision making, are analysed and taken into account. If you are unable to respond within the set time frame, you should provide all the information and analysis you have available, warning transparently that it has not been possible to complete the analysis process. Informed decision-making is crucial to ensuring the success and sustainability of EDP's investments.

### Question:



When analysing a potential partner of EDP in a new business, my team's study took into account several risk criteria, namely financial and profitability ones. Should I also ensure the ethical and integrity assessment of the elements that make up the partner's future management team if the deal comes to fruition?

### Answer:

Yes, and indeed EDP already takes this analytical aspect into account. The risk assessment of the partnership from the ethics and integrity standpoint is essential, so that any new relationship with third parties does not compromise EDP's reputation from any point of view. Economic Performance robustness is also based on the pillar of Ethics and integrity in business. It is essential to ensure that all EDP partners maintain the highest standards of ethics and integrity, thereby ensuring sustainability and trust in business.

## Find out...



### Related information

[Investors](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Stakeholder Relationship Policy](#)

[Sustainability Commitments](#)

[Financial Management Policy](#)

[Corporate Risk Management Policy](#)

[Whistleblowing Management Policy](#)



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Management

Heads of financial areas or CFO  
(Chief Financial Officer)

Ethics & Compliance Officer

[Speak up Channel](#)

## 2.2 Relationship with Customers

EDP understands the specific and changing dynamics of the market and acts in the constant pursuit of creating solutions that ensure customer satisfaction and value creation.

This management logic based on “customer value” assumes commitments from the Company in terms of **establishing fair prices, clear and trustworthy communication** about the characteristics and advantages of the marketed solutions, providing a high-quality service based on robust operations, among others.

Also taking into account the demanding regulatory context of the sector, EDP has implemented, whenever necessary, the mechanisms that ensure scrupulous compliance with the duties to which it is bound.



## We must

01.

Produce and present honest, transparent commercial proposals adapted to the needs of current and potential customers.

02.

Ensure that the advertising messages we transmit do not include discriminatory elements of any kind.

03.

Provide relevant, truthful and accurate information, in language that is accessible and adapted to needs, responding to requests, queries and complaints.

04.

Act with rectitude, courtesy and professional pride in the relationships with customers, respecting their rights, sensitivities and diversity.



05.

Promote ongoing improvement in our performance, as well as the quality of the products and services we provide.

06.

Set up and maintain simple and effective contact channels.

07.

Promote the adoption of responsible behaviour by customers, and consumers in general, which has a positive impact on the environment and society.

## We must not

01.

Under no circumstances disregard the protection of our customers' personal data, namely by not using the data collected for purposes that are different and incompatible with those for which they were collected or for marketing purposes without the necessary consent from the owner.

02.

Exploit our customers' lack of knowledge or vulnerabilities to promote new products and services.

03.

Include derogatory messages in formal and informal communication regarding our competitors and their products and services.

04.

Use stereotypes that diminish human dignity, or others that conflict with the laws in force, in either advertising or marketing campaigns.



Question:



When talking to a customer, I saw an opportunity to sell a product that would contribute to achieving my individual and team goals, but I recognise that it may not meet the needs of this particular client. What should I do?

Answer:

You should promote the characteristics of the product, in a very clear manner and ensure that the customer makes an informed and impartial decision about which is the best solution. Using clear and plain language you are helping to reinforce the company's good reputation. It is essential to put the customer's needs first and offer solutions that truly meet their expectations. This not only increases customer satisfaction but also strengthens trust in EDP.

Question:



In a market where EDP operates and where the energy sector is regulated, can I offer services – electricity, gas or others – to potential customers without referring to other commercial operators?

Answer:

The most appropriate will be to inform potential customers that there are several commercial companies operating in the market and, after this explanation, to present in detail EDP's commercial services, valuing in a correct and respectful way the distinctive factors of the Company's solutions.

Question:



While entering into the Power Purchase Agreement with an offtaker related to a project developed by the Company, I noticed a potential delay in the project and I am concerned about communicating this information to our offtaker due to the consequences that may arise. What should I do?

Answer:

You should always be transparent with our offtakers and inform them of the latest updates related to projects developed by the Company and within the scope of agreements entered into.

Question:



We are working on an image campaign, and we would like to use a photograph that includes a topic that can be considered sensitive from the point of view of society. Can I use the photo?

Answer:

It is important to consider whether the photograph in question may cause discomfort or adverse comments from any individual. If so, we should refrain from using it.

Find out...



## Related information

[Client Solutions](#)

[Stakeholder Relationship Policy](#)

[EDP's Integrity Policy](#)

[Whistleblowing Management Policy](#)



## We give everyone a voice

Management

Heads of the Marketing and Commercial areas  
of the Business Units

Ethics & Compliance Officer

[Speak up Channel](#)



## 2.3 Relationship with Suppliers

EDP, as a global "extended" company, interacts with a set of suppliers, with whom it works and shares responsibilities, who act and speak on our behalf with customers, citizens and other stakeholders.

Relations with suppliers should favour the alignment of their actions with EDP's global strategy for sustained growth, particularly regarding full respect for Human Rights and the assumption of a commitment to early decarbonisation.

**Maintaining relationships of trust with these companies is fundamental to EDP's success.**

Moreover, the success of the partnerships we build depends on how we choose them and the commitment we all demonstrate in strengthening their relationship.

Our relationship with suppliers is based on criteria of **impartiality, fairness and loyalty**, respecting their independence and identity.



## We must

01.

Select suppliers based on EDP policies and procedures which include ethical, technical and economic selection criteria – which are clear, impartial and pre-determined.

02.

Pursue global suppliers' who comply with health and safety standards and practices, environmental rules, labour and Human Rights legislation as well as other applicable laws, using audits for verification whenever critical supplies are involved.

03.

Enhance understanding of the value chain of EDP's critical suppliers and of the ethical risks inherent to the contracts entered, to ensure relationships are aligned with EDP's values.



04.

Responsibly scrutinise the conditions under which equipment and materials acquired by EDP from different suppliers comply, at their origin, with the established international standards.

05.

Respect each partner's own identity, but require them to fulfil, when entitled to act on EDP's behalf, the duties set forth in this Code.

06.

Ensure the confidentiality of information from suppliers and respect their intellectual property.

07.

Respect supplier time and resources by request proposals only from suppliers who are qualified or are reasonably expected to be qualified before contracts are executed.

08.

Give feedback to all suppliers about the outcome of their submissions in tenders and/or negotiation processes, showing respect for the time and effort invested, without compromising confidential information.

## We must not

01.

Agree to participate in decision-making processes selecting suppliers, which may generate situations of a potential conflict of interests.

02.

Impose unfair conditions on suppliers or fail to comply with agreed conditions, particularly regarding payments.

03.

Establish or maintain partnerships with suppliers that do not respect the ethical commitments they have undertaken with EDP.



# Examples

## Question:



I am scouting suppliers for a new construction project. One of the most competitive suppliers do not meet EDP's minimum requirements in Health and Safety for this project. Should I still solicit a proposal from them?

## Answer:

No. Safety is a top priority for EDP. EDP respects supplier time and resources and seeks to engage only with those who are qualified or are reasonably expected to be qualified to meet our standards before contracts are executed. It is important to communicate to the supplier why they are not being considered for this project and encourage them to improve their Health and Safety practices as soon as possible to enable future partnerships.

## Question:



I was contacted by a supplier who wanted to know why they were not awarded a particular tender. I am part of the team responsible for the technical analysis of the proposal. Can I provide them with the justification?

## Answer:

You can explain to the supplier the reasons why their tender was not awarded if you are authorized to do so by the Procurement Department. However, such a debrief must be carefully prepared to avoid disclosing confidential details of competing bids.

Find out...



## Related information

[Suppliers](#)

[Joining our partners](#)

[Sustainability in the Supply Chain](#)

[Procurement Policy](#)

[Stakeholder Relationship Policy](#)

[Code of Conduct for EDP Suppliers](#)

[Whistleblowing Management Policy](#)



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Management

Heads of Procurement

Ethics & Compliance Officer

[Speak up Channel](#)

## 2.4 Relationship with Communities

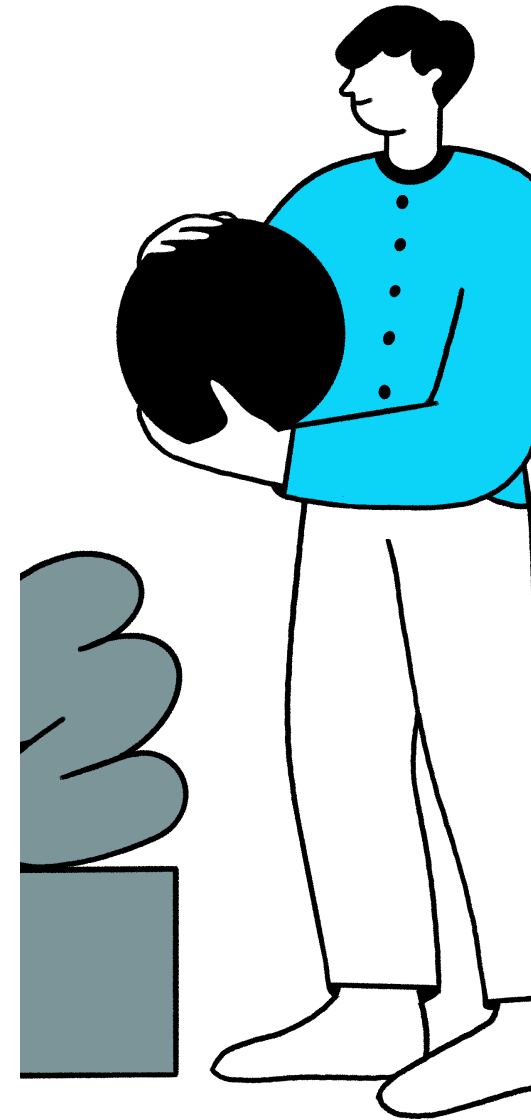
EDP creates a positive impact on society by valuing not only its employees and partners, but also the communities in which it operates, through respecting their sensitivities and cultures.

We have developed a culture of corporate citizenship and community engagement, aiming to address social needs aligned with the Company's core themes. We invest in Just Energy Transition projects that include support for energy access, energy inclusion, and communities impacted by the closure of thermal power plants. These projects aim to protect natural heritage and biodiversity and promote energy efficiency and renewable energies, contributing to decarbonization and combating climate change.

EDP's social investment strategy also focuses on Culture, with the mission of promoting access to culture, stimulating art, and protecting cultural heritage.

At the same time, recognizing the need to continue supporting projects that address other social needs of communities, part of the annual budget is allocated to investment in various areas such as education, health, social inclusion, emergency response, among others.

Understanding, communicating, trusting and cooperating are the guiding commitments for the active and transparent involvement that EDP continually promotes with local communities.



## We must

01.

Maintain an active relationship of proximity with local communities in the regions where we operate, engaging in regular, open and frank dialogue, seeking to learn about their needs, respecting their cultural integrity, seeking to contribute to improving the living conditions of local populations, sharing value.

02.

Maintain appropriate communication channels to inform citizens about the environmental impacts of our infrastructures as well as the risks and dangers of energy, whether these result from its normal use or from its misuse, or from the exploitation of facilities and equipment under its responsibility.



03.

Promote a Just Energy Transition that leaves no one behind, efficiency in energy use, and the adoption of more sustainable lifestyles.

04.

Acknowledge and uphold the rights of ethnic minorities and indigenous peoples where appropriate.

05.

Maintain an effective channel for complaints and grievances with communities, ensuring that their concerns and issues are addressed promptly, transparently, and fairly, strengthening trust and engagement with the local communities.

## We must not

01.

Engage, on behalf of EDP, in actions of a social nature that do not reflect our commitments and strategies of involvement with the community.

02.

Begin any intervention without consulting stakeholders to assess the possible social impacts and define the necessary mitigation measures.



## Examples

### Question:

I am participating in a fundraising campaign for a non-profit organization in the area where I live. Can I ask co-workers to contribute?



### Answer:

You should not solicit monetary contributions from colleagues in the workplace. Alternatively, you can contact your line management to try to involve the company in the effort to help that institution, using the departments with responsibility for donations.

### Question:

I was asked to help repair, over the weekend and, free of charge, the electrical facilities of the Sport Club in my town. I would like to do this and also ask for help from some co-workers at EDP who have technical skills in this area. I consider this to be skills-based volunteering, but I don't know if I can do it.



### Answer:

You should check whether the work of that institution fits within EDP's programmes, particularly the Social Investment Policy or the Volunteering Policy. If this is the case, you should contact the area responsible for donations to assess whether there is a possibility of institutionally involving the company in this assistance to the Sports Club.

## Find out...



## Related information

[Empowering our communities](#)

[EDP Y.E.S. – You Empower Society](#)

[Sustainability Commitments](#)

[Social Investment Policy](#)

[Volunteering Policy](#)

[EDP's Commitment to the Sustainable Development Goals](#)

[Stakeholder Relationship Policy](#)

[Whistleblowing Management Policy](#)

[Intranet area dedicated to Social Impact](#)

[Local Stakeholder Engagement Policy](#)



## We give everyone a voice

Management

Heads of Investor Relations & ESG

Heads of Social & Foundations

Ethics & Compliance Officer

[Speak up Channel](#)

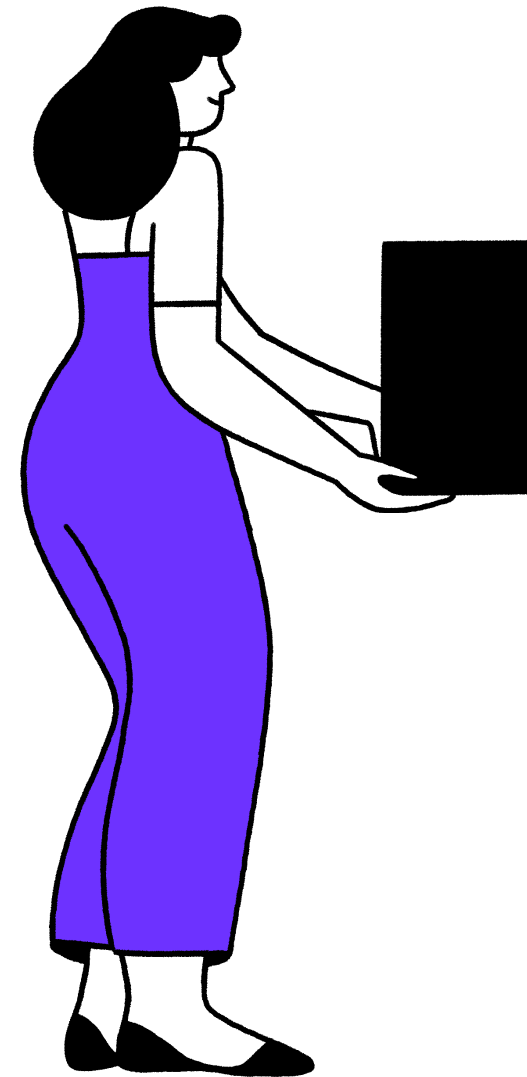
## 2.5 Competition

Competition is essential for the market, stimulating innovation, the quality of products and services, benefiting consumers with more options and fairer prices. In the face of market liberalization and diversity, as well as the increase in the number of competitors, the principles of Competition guide the actions of companies, encouraging the quality and efficiency of agents and promoting a more prosperous, fair, and balanced economy.

It is also important to bear in mind that, due to its importance, Competition legislation is currently very demanding, and that failure to comply with it results in imposition of heavy penalties, with a financial impact and consequences on the credibility and reputation of those involved.

The requirement to comply with the highest ethical, integrity and competition compliance standards, combined with EDP's global presence, both in terms of the areas of activity in which it operates in the energy sector and in the jurisdictions where it is represented, confers additional responsibilities towards its stakeholders.

It is in this context that EDP promotes training actions and dissemination of knowledge among its employees regarding Competition, having already implemented in some geographies a Specific Compliance Program of Legal Obligations of Competition, which includes a set of specific tools with the objective of safeguarding and ensuring that employees' conduct complies with the legal requirements in the field of Competition.





## We must

01.

When in doubt about the compliance of behaviour being practised or observed in Competition matters – whether in relation to current and potential competing companies, in relation to customers or suppliers, in duties representing professional or sectoral associations and in the analysis or construction of merger proposals, acquisitions or bilateral agreements, among others – employees must consult with the competent bodies regarding this matter in the Company, while always maintaining an integral and prudent attitude.



02.

Be particularly careful in oral and written communication concerning the company's strategic information, namely in terms of actual prices, quantities, customer portfolios, turnover, production costs, investments, sales, among others, in order to ensure that no doubts arise concerning the compliance of what is communicated with Competition rules and that the required ethical standards are not questioned.

## We must not

01.

Adopt any practices prohibited by Competition law.



02.

Under no circumstance, use information about competing companies obtained by non-legal means, or which leads to a violation of the applicable competition laws.

## Examples

### Question:

I was informed by someone who works at a competing company that this company will soon not be in a position to sell electricity. Should I raise the price of my market offer?



### Answer:

No. This information could be used as a presumption of concerted practice among agents. Therefore, you should immediately request the disclosure of this information to the other market agents (ideally recording your position) and, as soon as possible, inform the local team responsible for Competition matters about what happened.

### Question:

As a representative of EDP in an association, I participated in a meeting where other business representatives began discussing measures to mitigate the effects of inflation, and some competing companies shared the conditions of their market offers. How should I act in such a situation?



### Answer:

The discussion of commercially sensitive matters, such as prices, discounts, or commercial strategies with competitors or potential competitors, whether in formal forums like an association or informal forums like an event, can be perceived as collusive practice and should therefore be avoided. In this specific case, the EDP employee should refuse to participate in the discussion and leave the meeting if the participants insist on discussing the matter, ensuring that the reasons for leaving the meeting are recorded in the minutes. The employee should then share the occurrence with the local team responsible for Competition matters.

### Question:

I am part of a team negotiating the acquisition of a company. In this context, the potential seller wants to include a clause that prevents us from hiring all of their employees in the future if the transaction is not completed. Although I understand the seller's concerns, I fear that we may be violating some Competition rules by accepting this clause. Should I accept it?



### Answer:

Indeed, accepting a non-hiring clause can be understood as a no-poach agreement, which is a restrictive practice of Competition, as it limits employee mobility and reduces competition in the labor market. However, this clause can be legitimate and comply with Competition rules, provided that a series of criteria are met. This situation should be presented to the local team responsible for Competition matters so that they can analyze and support the negotiation with the selling company, particularly regarding Competition rules, especially in the context of labor markets.

## Find out...



## Related information

[Healthy Competition Practices](#)

[Whistleblowing Management Policy](#)

Specific Compliance Program for Legal Competition Obligations

### Portugal

[Competition Handbook](#)

### Spain

[Manual de Competencia](#)



## We give everyone a voice

Management

Legal & Governance Department – COE de Regulation&Competition

Competition

### Portugal

[concorrencia@edp.com](mailto:concorrencia@edp.com)

### Spain

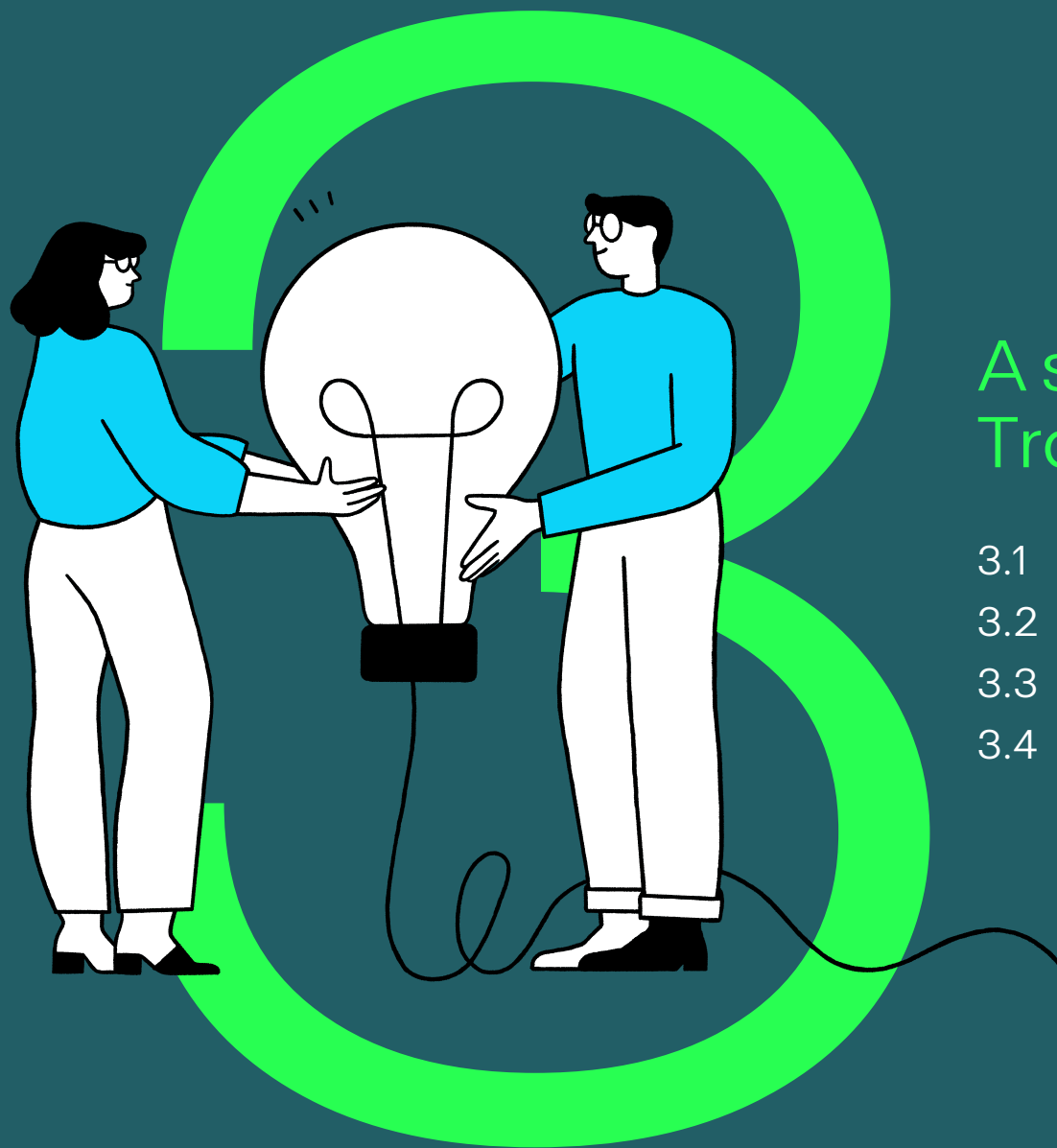
[regulacion.competencia@edp.com](mailto:regulacion.competencia@edp.com)

### Others

Local team responsible for Competition matters

Ethics & Compliance Officer

[Speak up Channel](#)



## A sector undergoing Transformation

- 3.1 Environment
- 3.2 Energy transition
- 3.3 Digital revolution
- 3.4 Entrepreneurship and Cooperation

## 3.1 Environment

**We look at the Environment as an asset and its preservation and regeneration as a duty.**

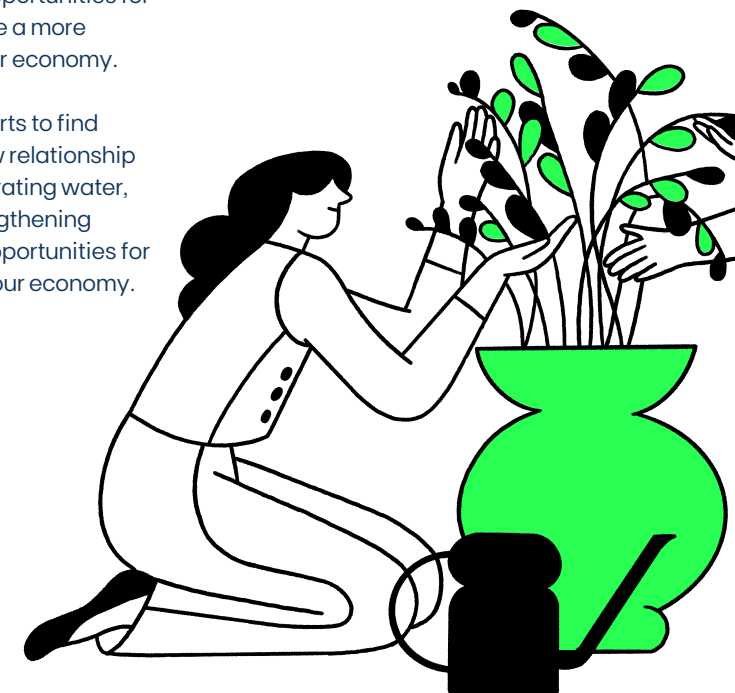
A strong culture of environmental risk management is essential **to reduce our ecological footprint**. we are therefore committed to implementing the best solutions to avoid or mitigate the environmental impacts of our activity and to continuously improve our performance.

We effectively address risks and opportunities by integrating environmental management into business processes, strategy and decision-making, aligning them with other business priorities and incorporating environmental governance into the global management system.

We have been supporting regeneration as a means to accelerate the transformation to a new level of ambition, going beyond traditional approaches of mitigating negative impacts to adopt strategies that promote significant positive impacts. Regeneration aims to restore the global environment, allowing the entire ecosystem to thrive. This includes strengthening society and creating opportunities for innovation that promote a more sustainable and circular economy.

This means driving efforts to find ways to establish a new relationship with the planet, regenerating water, soil, and air, while strengthening society and creating opportunities for innovation to promote our economy.

**The success of our environmental policy depends on everyone's commitment, the way we think, act and influence.**



## We must

01.

Act in accordance with the precautionary principle, when our activities may result in serious and irreversible damage to human health or the environment, even if uncertain but scientifically plausible. In these situations, we should take measures to avoid or mitigate these effects.

02.

Align our activities with national and international environmental protection strategies.

03.

Promote environmental awareness by acting as mobilizing agents in the defence and protection of the environment.



04.

Deepen our knowledge of the environmental risks and impacts of our activity, namely by using risk and opportunity assessment procedures, to strengthen the decision-making process.

05.

Actively promote the development of more environmentally sustainable technologies along the value chain.

06.

Promote good environmental practices throughout the supply chain, ensuring that our partners and suppliers adopt high standards of sustainability and environmental responsibility.

07.

Encourage the adoption of circular economy practices at all stages of our operations, prioritizing the reduction, reuse, and recycling of resources, thereby contributing to a regenerative and sustainable economic system.

08.

Cooperate with environmental authorities and listen to other stakeholders in the quest for ongoing improvement in our environmental performance.

09.

Promote our environmental Policy internally and with our partners and other stakeholders.

10.

Promote and collaborate to achieve the United Nations Sustainable Development Goals.

01.

Use or authorise materials/ products, technical solutions and/or internal or outsourced operational processes that endanger or degrade the environment, always favouring alternatives that are less harmful to the environment and economically competitive with the former.

02.

Ignore or neglect situations which jeopardise the environment, the company's legal compliance or defraud the expectations and needs of stakeholders.

03.

Make it difficult to analyse accidents or near-accidents of an environmental nature by refusing to participate or omitting relevant information.



## We must not

### Question:



A piece of equipment in one of our production units broke down. Although the unit can continue production, it is known that levels of pollutant emissions will rise sharply, exceeding the limits imposed by the environmental permits in force, until the device is replaced. The estimated repair time is four days, which is the time required to purchase and receive the equipment. Should I stop the unit even though I know that I would then be in breach of a supply agreement?

### Answer:

Yes, you should stop the unit immediately and repair it within the shortest period of time possible. Compliance with environmental licenses and the protection of the environment are fundamental priorities for EDP. Keeping the unit in operation while exceeding emission limits would not only violate legal standards but also compromise the Company's environmental responsibility. It is essential to communicate the situation to affected customers and seek alternatives to minimize the impact on supply, while ensuring the quick and effective repair of the equipment.

### Question:



On a weekend outing with my family, near a facility of ours which had been subjected to a maintenance intervention, I found cable and packaging waste from dangerous products. How should I proceed?

### Answer:

You should immediately report this situation, preferably to the department responsible for the work and demand the collection of waste left at the work site as well as its forwarding to the licensed Waste Operator; restoration of environmental conditions on site should also be required.

### Question:



I am part of the EDP team which coordinates works and during the course of a company contract I pointed out that toxic waste which had to be sent to the landfill was being burnt; to which I was told that this was an exception because they would not finish the job on time. Now I do not know if I should ignore this because I have already done what was required of me, or whether I should report the situation because this is putting the companies that are working here at risk and still polluting the environment.

### Answer:

You must report the situation in writing to the contract manager. This will help EDP, and the other companies involved to comply with all the legal obligations to which they are subject. You are acting in accordance with the applicable law and internal procedures, namely environmental legislation, and are not putting anything or anyone at risk.

### Question:



I am working on a project to rehabilitate degraded areas around our energy production facilities. The goal is to restore local ecosystems and promote biodiversity, but I feel that we are not incorporating EDP's sustainability commitments. What should I do?

### Answer:

Employees are expected to be aware of and incorporate all of EDP's commitments into their projects, particularly those outlined in the new sustainability strategy. You should remind the team of this strategy and, if necessary, escalate the issue to higher management to ensure compliance. EDP has renewed its sustainability strategy for 2023–2026, with goals set for 2030 organized into five priority areas, including the regeneration and preservation of nature. An example is the Space4Nature program, which aims to accelerate the implementation of Nature-Based Solutions (NbS) and promote biodiversity. This program includes the adoption of new scientific standards, the improvement of biodiversity management, the acceleration of actions in the territory, and the empowerment of employees. The success of our partnerships depends on well-founded choices and the efficient management of environmental risks.

Find out...



## Related information

[Protect our planet](#)

[Sustainability Commitments](#)

[Environment Policy](#)

[EDP Group Materiality](#)

[EDP's Commitment to the Sustainable Development Goals](#)

[Whistleblowing Management Policy](#)

[Intranet area dedicated to Sustainability](#)



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Heads of Investor Relations & ESG

Ethics & Compliance Officer

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## 3.2 Energy transition

The world is undergoing a profound process of transformation in search of sustainable development in where one of the major challenges is to **slow down ongoing climate change** while ensuring a **fair energy transition**.

The escalation of climate change confronts mankind with the urgent need to reduce CO<sub>2</sub> emissions. if global warming is not limited to a maximum of 1.5°C, above pre-industrial levels, we risk facing extreme weather events and natural imbalances, such as rising sea levels, with devastating effects. on infrastructure and cities, health and social well-being. The consequences for the environment and biodiversity will also be incalculable and dramatic. Climate urgency requires all companies to take on the ethical duty to substantially **reduce** and **eliminate**, where possible, **carbon dioxide emissions**.

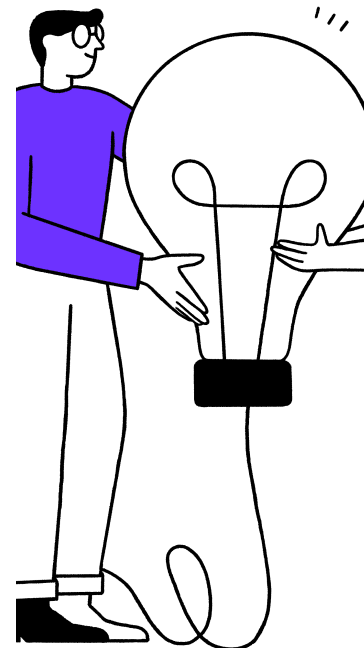
The energy transition is the unstoppable and global journey towards 100% renewable energies. decarbonization. electric mobility. efficient equipment, and an increasingly green life. powered by renewable energy sources and free of pollutant emissions.

Maintaining the focus on “being 100% green by 2030”, at EDP we work daily to lead the energy transition, taking advantage of our ability to adopt new technologies to generate more value for our stakeholders. We do so by being impact-oriented and anticipating future challenges, with the courage to actively promote change.

The Company is committed to achieving carbon neutrality (Net Zero) in its daily operations, by promoting emission reductions with its business partners and empowering communities. Throughout its value chain, EDP continuously promotes **energy efficiency and the replacement of fossil fuel by renewable energy sources**, with a view to contributing to a new economy and ways of life that respect the planet and promote social well-being.

In EDP's view, electrification is one of the essential vectors for the decarbonisation of the economy, when produced from renewable energies.

Through continued innovation, renewable electricity production must increase to replace fossil fuel consumption in services, industry and transport. When electrification is not a viable solution, technologies such as green hydrogen (produced from renewable energy) could give an important contribution to decarbonisation of the planet.





## We must

01.

Contribute to ensuring affordable, reliable and sustainable energy, promoting the adoption of more flexible, clean and efficient production technologies.

02.

Create emergency plans and strengthen the resilience of infrastructure to cope with extreme events.

03.

Develop the intelligent management of energy production and consumption.

04.

Foster technological innovation and invest in solutions that increase the production and consumption of renewable energy.

05.

Contribute to the enhancement of “energy literacy”, both internally and externally, helping to equip ourselves and the general population with greater and better capacity to engage in a fair and equitable energy transition.

06.

Promote the development of public measures to address energy poverty and the protection of vulnerable consumers.

07.

Stimulate the development of energy efficiency measures and services with customers.

08.

Contribute to the increased use of renewable energy in transport and industries.

09.

Contribute to the awareness on climate change and energy transition.



## We must not

01.

Implement solutions or make investments without prior analysis of climate, environmental and social impact and without ensuring compliance with the EDP Code of Ethics and Policies.

02.

Purchase products or services without assessing the production and supply chain and without ensuring the sustainability principles advocated by EDP.

03.

Move away, individually and collectively, from the fight for decarbonisation and for a fair and inclusive energy transition for all.



## Examples

### Question:

In the management team, we were planning a series of working meetings which would involve travelling to different regions. I suggested that we replace at least part of those trips with online sessions. Although my proposal was not accepted, did I act correctly?



### Answer:

Yes, you did. An action that is more in line with EDP's commitments to reduce CO<sub>2</sub> emissions is the most appropriate.

### Question:

A supplier of wind energy production equipment for self-consumption facilities contacted me to inquire about EDP's possible interest in a partnership to sell his products. I explained that EDP produces and sells its own energy and that, as such, we would not be interested in solutions which would reduce energy consumption. Did I do the right thing?



### Answer:

No. First of all, you should bear in mind and remind the supplier that EDP has instituted a broad market consultation process that any supplier must go through. On the other hand, you should also keep in mind that self-consumption is an essential part of the energy transition process that we should encourage because it helps to raise general awareness of the challenge for all, as it reduces emissions, losses, investments and helps to electrify consumption.

## Find out...



## Related information

[Leading energy transition](#)

[Sustainability Commitments](#)

[Climate Transition Plan](#)

[EDP's Commitment to the Sustainable Development Goals](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Whistleblowing Management Policy](#)

[Intranet area dedicated to Sustainability](#)



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Ethics & Compliance Officer

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## 3.3 Digital revolution

Technology is a key part of EDP's strategy and is decisive in the way the company manages its assets and relates to its customers and stakeholders in general.

The digital revolution we witnessed a few years ago is an opportunity to build a better society, at the service of Humanity, where competencies can be increased and more balanced life solutions can be created in the everyday life, in the professional context, in health and well-being in general. It is known, however, that this revolution also entails new risks that can have significant impacts, particularly economic and on the lives of individuals and society as a whole, and therefore also of an ethical nature.

EDP is aware of its responsibility in this matter, unequivocally recognising the need **to ensure careful and ethically committed management of information systems**, at all stages of the information life cycle, including system design, source selection, knowledge extraction, data integration and analysis, as well as the development of analytical model algorithms. Cyber-security also deserves particular attention these days, and EDP has increased the attention paid to its systems in this area.

Thus, the Company is aware, in its action in this field, of the need to carry out a **systematic assessment of ethical risks**, paying particular attention to the use of Artificial Intelligence in the various developments, the **guarantee of the quality of its business data** and the consistent practice of robust, up-to-date cybersecurity procedures.



## We must

01.

Identify, assess and document ethical risks, in the stage prior to the design or acquisition of technologies, mainly disruptive technologies, such as Artificial Intelligence, Generative Artificial Intelligence, robotics, among others.

02.

Ensure, right from the system design stage, the incorporation of ethical criteria in decision-making, aiming at the applicability of digitalisation concepts for the benefit of society in general and, in particular, ensuring proportional human control in all autonomous and critical systems.

03.

Mitigate ethical risks in the design phase through quality assurance processes and the integrity of data and algorithms, including clear and transparent documentation of them.

04.

Ensure transparency and the possibility of interpreting the obtained results, guaranteeing that they are auditable and reproducible.

05.

Strive for the security of data, systems and analytical models, taking into account the potential risks associated with a security breach, in full compliance with the Group's information security policy and standards.

06.

Continuously monitor the systems and promote a culture of responsibility among all involved, ensuring that the ethical impact is continuously assessed and that everyone understands and assumes the consequences of their actions and decisions, ensuring the necessary training.

07.

Foster everyone's responsibility in identifying opportunities for improvement and efficiency, leading to more sustainable goals, through new digital technologies.

08.

Strongly promote the development of employees to adapt to technological transformation, stimulating the necessary training, retraining and adaptation, and creating qualified functions for professional paths sensitive to ethical technological risk.

09.

Promote scientific employment to attract people with highly specialised knowledge in new technologies and at the same time advocate for their retention at EDP.

## We must not

01.

Allow the development of systems or analytical models that directly or indirectly promote any form of injustice, discrimination, prejudice, or exploitation of vulnerabilities of users impacted by the systems.

02.

Enable the procurement and development of systems that do not comply with cyber security best practices, exposing customers, suppliers, and society to potential harm.

03.

Ignore signs of ethical impacts caused by any technology in use, failing to report them adequately.

04.

Neglect the opinions or complaints of stakeholders regarding possible ethical issues.

05.

Allow improper or undue storage of documentation, particularly when personal data is involved, in order to prevent negative impacts on the Company, customers, suppliers and society in general.

06.

Neglect the active pursuit of knowledge about the ethical risks of incorporating Artificial Intelligence into daily activities.



## Examples

### Question:

I have noticed that a recently acquired computer program seems to have a systematic bias that penalizes the female gender, although I am not entirely sure. Should I report this suspicion, or should I just keep an eye out?



### Answer:

If in doubt, you should report your concern immediately, so that a comprehensive and accurate assessment of your suspicion can be carried out. It is essential to ensure that all systems used by EDP are fair and equitable, without any form of discrimination. Prompt reporting allows the situation to be investigated and corrected if necessary, ensuring integrity and equality in the Company's processes.

### Question:

I am part of a task group that is developing an application which uses Artificial Intelligence and I believe that limits are not being correctly applied on the algorithm, that is, on the "machine's performance". I have already alerted the group more than once, but everyone thinks I am being overzealous. I am convinced that we are not making a proper risk assessment of this project. How should I proceed?



### Answer:

You should insist on this concern with the head of the task group and, if your concerns are still not addressed, you should use the other reporting channels for this purpose. Proper risk assessment in Artificial Intelligence projects is crucial to ensure safety, ethics, and compliance. If you have legitimate concerns about the algorithm's limitations and associated risks, it is important that these concerns are addressed and investigated. EDP values responsibility and proactivity in identifying and mitigating risks in all its projects.

## Find out...



### Related information

[Our digital transformation](#)

[Whistleblowing Management Policy](#)

Intranet area dedicated to...

[Our digital transformation](#)

[Information Systems Security](#)



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Digital (DGU)

Ethics & Compliance Officer

[Speak up Channel](#)

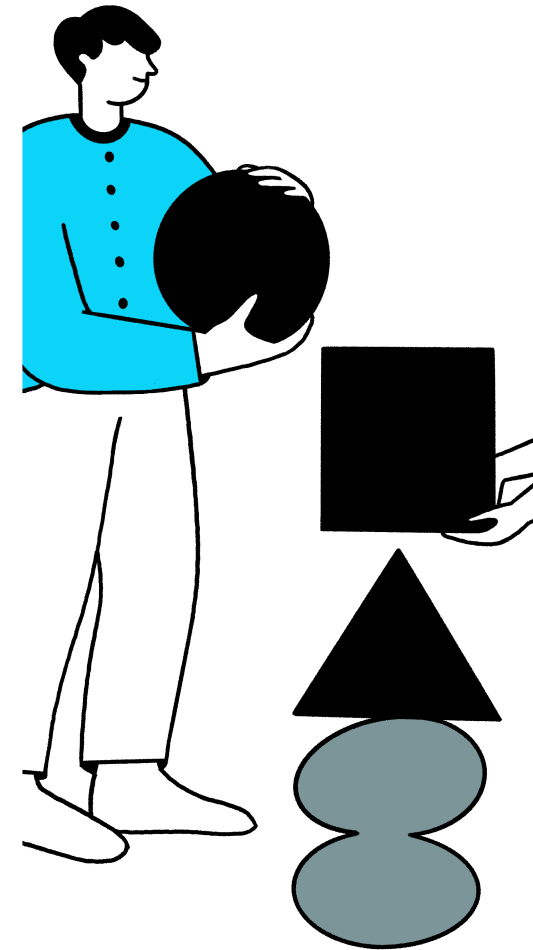
## 3.4 Entrepreneurship, Innovation and Cooperation

In an era where the energy sector is undergoing constant transformation driven by technological and social evolution, EDP has been reinforcing its commitment to promoting innovation, technological development, accelerating the energy transition, and knowledge management in the energy domain.

We are living through a transformational period for competitiveness based on new working methodologies and a networked, coordinated, and cooperative approach, which is already a reality.

However, the complexity of innovation ecosystems and structures, such as those existing within the EDP Group, in a digitally interconnected context, generate various challenges, including corporate risks arising from actions involving internal and external stakeholders.

In this context, ethical conduct and a constant focus on risk management and mitigation are fundamental to ensuring that digital transformation and innovation do not compromise or overshadow the ethical principles of EDP and all its employees.



## We must

01.

Encourage collaborative and cooperative practices with a common and clear purpose.

02.

Ensure that in the ecosystems where EDP operates, all partners comply with the EDP Code of Ethics.

03.

Encourage openness and transparency in order to learn from mistakes and mitigate risk exposure.



04.

Promote balanced relationships with expectations appropriate to the maturity stage of the entities involved in these ecosystems.

05.

Create testing environments appropriate for the technologies and/or business models to be tested, so that the associated risks are controllable.

## We must not

01.

Breach the confidentiality of the information we access and, in particular, avoid exposing the intellectual property of EDP and third parties to situations that may lead to its appropriation by other entities.

02.

Personally invest in opportunities identified within the Company.



# Examples

## Question:



I particularly liked a business idea developed as part of an internal project. I find it very promising, but unfortunately, EDP does not intend to take it forward. Can I proceed with it using my own resources outside working hours?

## Answer:

Not as a rule, no. However, there may be exceptions which should be analysed with your line manager.

## Question:



A group of start-ups with whom we will start working on collaborative projects asked me if I could organise a session to share best practices on the implementation of Ethics & Compliance. Can I do this?

## Answer:

Yes. EDP has the habit of sharing its best practices, particularly in the area of ethics and compliance, and for this reason you can share them with these organizations that will now be part of our ecosystem, as long as it is previously aligned with your hierarchy.

## Question:



A friend asked me why EDP is investing in start-ups as an alternative to other possible financial investments. What should I answer?

## Answer:

You should answer that EDP's investment objectives in start-ups are not exclusively financial; EDP believes that these new companies, normally dedicated to research and innovation, enhance the creation and transfer of technical knowledge, promoting efficiency and new business, but also new working methodologies. That is why making these investments is part of a search, not solely focused on financial return, but also for a strategic relationship, mutually creating value (in addition to the aforementioned financial return) for EDP and the start-up itself.



Find out...



## Related information

[Stakeholder Relationship Policy](#)

[Whistleblowing Management Policy](#)

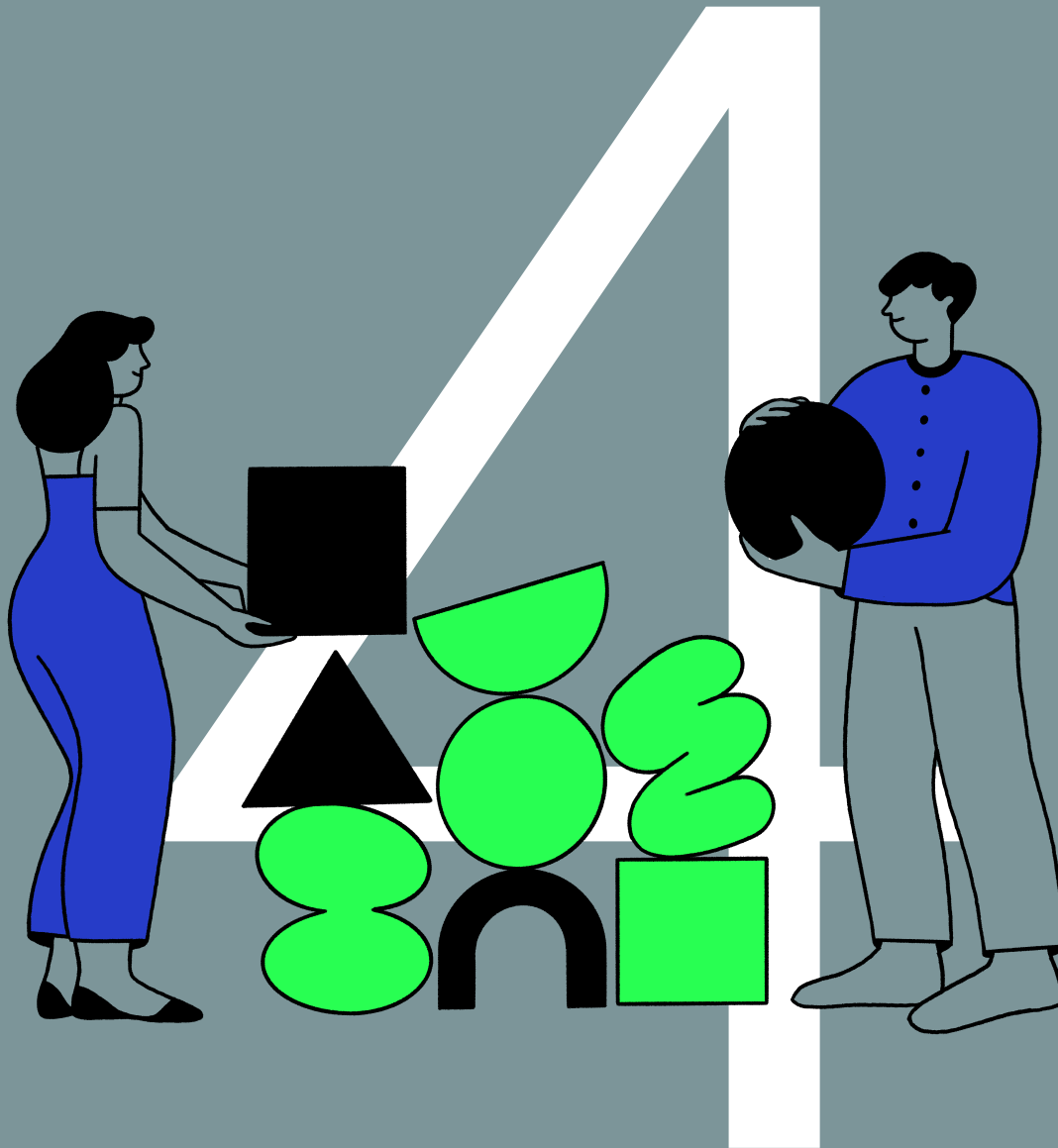


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## Action with Integrity

- 4.1 Corruption and Bribery
- 4.2 Conflict of Interest
- 4.3 Gifts and Entertainment
- 4.4 Money laundering and countering the financing of Terrorism
- 4.5 Privacy and Personal Data Protection
- 4.6 Use of Company Information
- 4.7 Use of Assets

## 4.1

# Corruption and Bribery

Illegal acts, whether by act or omission, such as corruption or influence peddling, jeopardise the peace, security and well-being of citizens as well as the stability of markets. These practices also undermine democracy and the rule of law, diverting resources needed for the growth and development of society, and promoting instability, insecurity and distrust among citizens. Therefore, according to a rationale of **zero tolerance, the prevention and fight against corruption and bribery has been widely and increasingly embraced** at a global level, namely through the adoption of laws and the promotion of cooperation between private entities and public authorities.

**EDP prohibits the practice of corruption and bribery, actively or passively**, through acts or omissions, including the creation and maintenance of situations of favouritism through facilitation payments or other irregularities.

EDP has **policies and procedures in place for the prevention, detection, correction and control regarding corruption matters, primarily the Integrity Policy.**



## We must

01. Anticipate and clarify situations which may constitute or be perceived as corruption or bribery.

02. Respect, when dealing with employees and officials of public entities, the duties of impartiality to which they are subject, avoiding any action or omission that directly or indirectly has a fraudulent, coercive, manipulative or deceptive influence, and refraining from giving or promising them any type of benefit that is not due to them.

03. Disclose, comply and enforce internal regulations on facilitation payments, political contributions, donations and sponsorship, gifts and invitations to events, interactions with public officials and politically exposed persons and the prevention and management of conflicts of interest.



04. Comply with internal standards regarding due diligence in the identification and integrity analysis (Integrity Due Diligence) of third parties prior to establishing business relationships, ensuring the adoption of the foreseen and applicable risk mitigation mechanisms.

05. Report through the appropriate channels, any alarm signals or actions that may be associated with a potential act of corruption, receiving or offering undue advantages or any other illegal, criminal or administrative offences.

## We must not

01. Solicit, accept, give or promise gifts, presents, loans, hotel stays, personal services or other gratuities, even in the form of preferential treatment from customers, suppliers, government authorities or any other person or entity connected to the Company's business, which could result in any undue personal advantage being obtained for the Company or for third parties.

02. Solicit, accept, give or promise any material or non-material advantage, when such advantages are not due.

03. Make, on behalf of the Company, monetary or other contributions to political parties.

04. Make referrals to customers, even if requested by them, of suppliers or companies that may be directly or indirectly related to the Company's business.



# Examples

## Question:

During the certification of an installation, I identified a defect which will lead to its non-compliance, according to the applicable legislation. The customer was very distressed and suggested hiring me to repair the equipment myself. I know that these regulations are sometimes exaggerated, and this installation is not very risky. Can I repair the equipment because I have the technical knowledge to do so and then proceed with the approval?



## Answer:

No. You should inform the customer that you have no alternative but to fail the installation and specifically explain the defect identified, so that the customer is properly informed. Only then will you be complying with the applicable law, not putting the customer at risk and being loyal to the Company in addition, the customer could get the idea that it influenced your decision to fail the certification and that you are trying to be compensated for that.

## Question:

A supplier wants to offer me a trip to the finals of a sports championship. This supplier wants to be awarded a tender opened by EDP. Can I accept?



## Answer:

No. The acceptance of offers / invitations, when the parties are involved in negotiations, bidding, near prospect of contract review, or recently concluded contract review, is prohibited, except if they fit as common courtesy practices, appropriate to the context. The acceptance of gifts must comply with the rules and limits defined internally, namely in terms of value and frequency.

## Question:

The inspector of a public entity responsible for the licensing of a facility, the development of which I am managing, has expressed concerns about the safety of one of the items of equipment used in that facility. So, to license the installation into operation, they mentioned that it would be necessary to carry out additional safety tests that could take a few weeks, unless they were paid an "emergency fee", in order to prioritise these additional tests. The deadlines initially planned for the installation to start operating have already been exceeded and this additional delay may further compromise the attainment of my goals. Can I make the payment and consider it an expense associated with licensing the installation?



## Answer:

No. Such a payment, made directly to an inspector, can be considered a form of corruption and bribery to overcome any constraints in the licensing process. You should check with the licensing authority if there is any process that allows urgent situations to be dealt with, ensuring that all necessary safety tests are carried out as quickly as possible and that all licensing expenses are duly supported by documents.

Find out...



## Related information

[Ethics & Compliance](#)

[EDP's Integrity Policy](#)

[Social Investment Policy](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Code of Conduct for EDP Suppliers](#)

[Whistleblowing Management Policy](#)

[Intranet area dedicated to Integrity](#)



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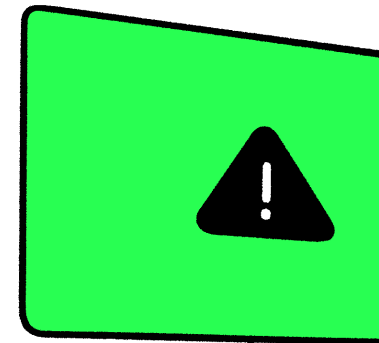
## 4.2 Conflict of Interest

A conflict of interest corresponds to a situation in which the aims or advantages that a certain act is intended to pursue or achieve may interfere with compliance with the duties of impartiality and objectivity or with EDP's interests. Conflicts of interest may be apparent, situations that may be interpreted as a Conflict of Interest although they may not in fact be so; potential, situations arising from which a Conflict of Interest may arise in the future; real, situations of actual Conflict of Interest.

Conflicts of interests may occur in the normal course of business and, if properly identified and managed, do not constitute a breach. Therefore, as soon as an apparent or potential situation is identified, it must be communicated and managed, following the paramount principle of total transparency.

**Any conflict of interest could damage the reputation of the Company, employee or partners involved.** For EDP, the ground rule is **transparency**. This means recognizing and disclosing all situations that create, or appear to create, conflicts of interests between our personal and EDP's interests.

EDP has policies and procedures, such as the global Conflict of Interest Procedure, to ensure **impartiality and fairness in its actions and decision-making processes**, in situations of potential conflict of interests involving the company, employees or partners.



## We must

01.

Always act so that personal, family or third-party interests related to us do not prevail over the interests of EDP and stakeholders.

02.

Communicate to line managers and step away from, or encourage withdrawal from, the respective decision-making processes, in all situations that may generate conflicts between personal interests and the duty of loyalty to the company, such as: family or equivalent relationships in direct hierarchical or functional dependency; carrying out external professional activity that interferes with our duties or with the company's activities; ownership of legal, equity or family positions likely to interfere with the interests of the company or with the activities undertaken.



03.

Be aware that there are limitations to the transaction of goods and the contracting of services by EDP with its related parties, and we are all responsible for complying with the applicable internal rules.

04.

Be familiar with the procedures for prevention, identification and resolution of conflicts of interest, both in general terms and in relation to Related Party Businesses, when covered by the Related Party Transactions Policy.

05.

Obtain authorisation from management to carry out other professional activities, provided that they do not result in a deterioration of work performance, do not interfere with duties to the Company, and do not inherently present a risk of conflict of interest, duly confirmed by Ethics & Compliance.

## We must not

01.

Use information that we have access to because we are EDP employees in situations benefiting ourselves to obtain personal advantages and for family or friends.

02.

Engage in any outside professional activity, whether remunerated or not, that affects the performance of our professional duties or EDP's activities or interests, namely by negotiating on our own behalf or on behalf of others in competition with the Company.

03.

Involve the Company in our personal activities, in political, religious, sectarian or partisan positions of any kind.





# Examples

## Question:

A supplier, who is also a family relative, is making a tender bid for the supply of equipment to EDP and I am involved in the awarding process. This supplier is a well-positioned candidate in the tender and highly likely to win. What should I do?



## Answer:

You must immediately report the situation to your manager and to the Ethics & Compliance. This involves a conflict of interests so you will have to withdraw yourself from the analysis and decision-making process of this tender.

## Question:

I want to go ahead with a financial stake in a company that is active in the same sector as EDP. This participation seems to me a good investment opportunity to apply part of my savings. Can I proceed without worries?



## Answer:

Direct investment, or through relatives (spouses/cohabiting partners, and first-degree relatives or kin in a direct line and second-degree relatives or kin in a collateral line), in third parties related to EDP, such as its competitors, may result in a situation of apparent, potential or real conflict of interest. You should report the situation to the Ethics & Compliance so that the situation can be assessed.

## Question:

I am taking part in a recruitment process in which there is a person whose profile seems to me to be the most suitable for the job opening. This person happens to be a friend of mine. I would like to give my assent, but I'm afraid that this is, or might appear to be, a conflict of interest. Does conflict of interest only apply to family, or does it also cover these situations?



## Answer:

A conflict of interest may be caused by a family or friendship relationship; in which case you should disclose the personal relationship to your line manager and the Ethics & Compliance and remove yourself from the decision-making process.

## Examples

### Question:

My brother-in-law wants me to intervene internally in the resolution of a dispute he has with EDP. He says he is tired of trying to settle the matter over the phone and has no doubt that he is right. Should I step in?



### Answer:

No. to help your brother-in-law you can try to identify the problem internally, but you cannot promote its resolution or ask others to do so in a way that unjustifiably benefits your relative.

### Question:

A friend asked me to be his partner in a trading company that provides services to an EDP Group company. He believes that the fact that I work at EDP could be an important added value, because I have access to information that could prove to be a competitive advantage. Can I accept?



### Answer:

No, you shouldn't. Because this is a conflict of interest situation from the outset. You must inform the Ethics & Compliance department and your line manager and follow the recommendations given.

## Find out...



### Related information

[Ethics & Compliance](#)

[Transactions with Related Parties Policy](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Code of Conduct for EDP Suppliers](#)

[Whistleblowing Management Policy](#)

[Intranet area dedicated to Integrity](#)



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## 4.3

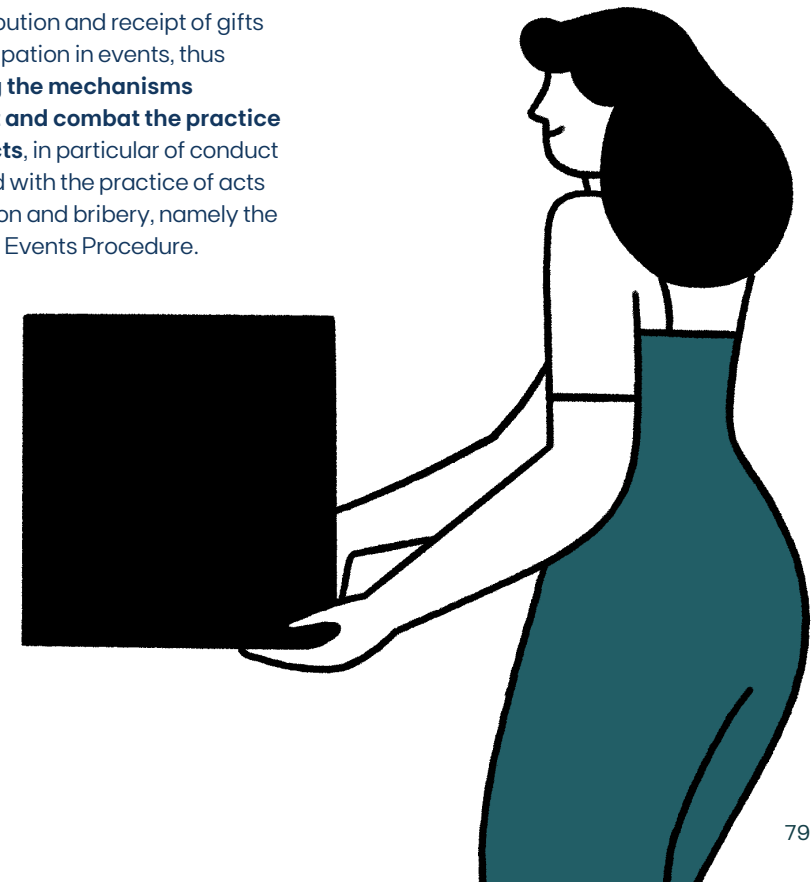
# Gifts and Entertainment

The practice of offering gifts, hospitality and courtesies, as well as legitimate expenses of the Company, are an important and normal part of creating and maintaining business relations. They may, however, be applied to conceal corruptive conduct or the receipt or offer of undue advantages, so that the exchange of any material or non-material advantage may only occur in strict compliance with the applicable laws, policies and procedures, in a moderate manner and commensurate with the context.

**Any offer must be transparent, socially appropriate** according to custom and practice, **reasonable** in terms of professional courtesy, and **supported** by information circuits that transfer the power of decision regarding this practice to hierarchical superiors.

At EDP **we neither offer nor receive gifts that may generate inappropriate perceptions** about business decisions or undue advantages.

EDP has procedures that systematise the principles of action, the duties and the rules to be observed in the attribution and receipt of gifts and participation in events, thus reinforcing **the mechanisms to prevent and combat the practice of illicit acts**, in particular of conduct associated with the practice of acts of corruption and bribery, namely the Offers and Events Procedure.



## We must

01.

Make known, comply with and enforce internal regulations on receiving and offering benefits (e.g., gifts, meals and entertainment, travel and accommodation).

02.

Report through the appropriate channels any alarm signals, actions or omissions that may be associated with potential undue advantages, whether material or not.



03.

Act in such a way that the external perception of our behaviour in this field is always transparent and unequivocal with regard to our integrity.

## We must not

01.

Give, accept or promise gifts, presents, loans, hotel stays, personal services or other benefits, even in the form of preferential treatment of customers, suppliers, government officials or any other person or entity related to the Company's business, which may result in an improper advantage for you or a third party.

02.

Give, accept or promise any advantage, material or immaterial, when such advantages are not due.



# Examples

## Question:

A supplier sent me an invitation to the private area ("VIP") of an event for which entrance is not available to the general public. Can I accept, as this offer has no clear value attached?



## Answer:

First, one should try to ascertain the value of the invitation with the supplier. If it is not possible to determine the value, the invitation must be submitted for approval by the hierarchy through a registration in the tool prepared for this purpose.

## Question:

We're about to close a new deal with a foreign client. This transaction is important to meet the objectives of my department. The client's manager is in Lisbon, so I thought it would be a good idea to offer him a weekend in the Algarve as a courtesy. Can I do this?



## Answer:

No. Offers to customers cannot be made when the parties are involved in negotiations, bidding or are about to enter into a contractual revision, as they may be associated with corrupt practices and/or obtaining undue advantages. The integrity of the contracting processes and EDP's reputation in the market are more important than any new contract.

## Question:

In my role in EDP I organise meetings, events and trips. Now one of the hotels we usually work with has offered me a weekend stay so my parents can celebrate their wedding anniversary. May I take you up on their kind offer?



## Answer:

No. Even if the benefit is to your family, accepting this offer would make it difficult for you to be impartial when organising future bookings for EDP. You should politely decline and make clear why.

## Question:

I have been invited by one of our suppliers with whom I am negotiating a contract, to a concert event where they will be hosting a VIP section for clients. They have offered to cover the cost of the ticket, which has a high commercial value. Can I accept the invitation and attend the event?



## Answer:

In this situation, as you are in a contract negotiation period with this supplier, you should not accept the invitation to attend entertainment events. Accepting such invitations, especially during negotiation periods and when the costs are covered by the supplier, can create a perception of a conflict of interest and may influence or appear to influence our business decisions. It is important to maintain impartiality and transparency in all our dealings with suppliers. Additionally, you should always check if the value is within the limits defined in EDP's procedures that regulate such situations. In case of doubt or need for approval, please inform the Ethics & Compliance about the invitation for their analysis and further assessment of the supplier's practices in line with EDP's ethical standards.

Find out...



## Related information

[Ethics & Compliance](#)

[EDP's Integrity Policy](#)

[Social Investment Policy](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Code of Conduct for EDP Suppliers](#)

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## 4.4

# Money laundering and countering the financing of Terrorism

EDP's work is guided by high ethical standards, business integrity and strict respect for and compliance with current legislation and regulations regarding the **prevention of money laundering and the financing of terrorism (PML-CFT)**. Accordingly, EDP adopts the duties and procedures to be observed in the detection and prevention of PML-CFT, namely those necessary to know the identity of the relevant counterparties in the deals it intends to conclude and only concludes such deals if it identifies no signs of irregularities.

EDP has a set of policies and procedures – included in the Programme for the Prevention of Money Laundering and the Fight against the Financing of Terrorism – which include measures aimed at responding to the legal duties and requirements associated with these matters, namely identification procedures – Know Your Counterparty (**KYC**) and due diligence – Integrity Due Diligence (**IDD**). Such policies

and procedures establish concrete measures that must be adopted to comply with all legal and regulatory obligations to which EDP is bound, taking into consideration the different characteristics of the various business areas and the potential risk of money laundering and financing of terrorism.

To ensure the effective application of the **procedures** defined in this area, a governance model has been systematised and different roles and responsibilities have been defined to be respected in complying with the legal duties to which EDP is bound.

EDP's staff ensures the strictest compliance with both the **legislation** applicable to the different activities and jurisdictions in which we operate, and the internal procedures established on this matter, and they are subject to training that enables them to best perform the functions that are indispensable in this regard.



## We must

01.

Report all suspicious situations that may raise doubts as soon as possible, through the internally defined channels, and maintain strict confidentiality about them.

02.

Identify and know, in accordance with applicable laws, policies and internal procedures, our counterparties, including their beneficial owners, before entering into any business or transaction, in order to ensure that we are working with reputable counterparties and that the source of funds is not criminal or otherwise illicit.

03.

Review at appropriate intervals the counterparty's identification details and ensure that the funds involved continue to be lawfully sourced.

04.

Only receive and make payments from and to entities who have completed our internal procedures of identification – Know Your Counterparty (KYC) and due diligence – Integrity Due Diligence (IDD), and contracts must be signed with adequate safeguards in terms of integrity and prevention of money laundering, duly authorised under the corresponding internal procedures.



## We must not

01.

Enter into a business relationship or perform any transaction when the counterparty is suspected of being involved in money laundering or terrorist financing practices or any other illicit conduct.

02.

Accept cash payments. However, when there is no other alternative, we must comply with the maximum amount authorised by law, and we must obtain prior authorisation from our superiors.

03.

Make payments without the proper authorisations and without prior knowledge of the counterparty and of the associated transactions.

04.

Invest, lend, contribute, partner, act or develop activities with or for the benefit of any person, entity or country subject to international sanctions.





## Examples

### Question:

A counterpart is in a rush to close a contract, the return is huge, can I ease the process?



### Answer:

No. Any contract must be scrutinised by internally instituted procedures, always complying with all pre-established steps. Any change to the process constitutes a breach of internal policies and procedures, with possible consequences for the employee or employees who do it and may also have a negative impact on EDP's reputation or generate civil, criminal or administrative liability.

### Question:

A business opportunity has been identified with a partner whose parent company is based in a tax haven. Considering that only the parent company is located in a tax haven, would it be necessary to report this business opportunity?



### Answer:

Yes, before starting any commercial relationship, we must ensure the identity of the counterparties and conduct the respective risk analysis in accordance with the AML-CFT procedures. The business should only proceed after identifying any potential risks and in accordance with the respective recommendations. EDP employees have the duty to ensure compliance with this policy with the utmost rigor and attend the training to which they are subject in this matter.

## Find out...



### Related information

[Ethics & Compliance](#)

[EDP's Integrity Policy](#)

[Whistleblowing Management Policy](#)

[Intranet area dedicated to money laundering and terrorist financing](#)



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## 4.5 Privacy and Personal Data Protection

### Privacy is a fundamental right.

The legislation on personal data grants the data subjects a set of specific rights aimed at ensuring their privacy and the protection of their personal data.

EDP collects, processes and retains personal data to the extent strictly necessary for the achievement of its legitimate purposes.

EDP has policies and procedures to ensure the **privacy, security and protection** of the personal data of all its employees, job applicants, customers, suppliers and other subcontracted entities and stakeholders in general.

Service providers authorised to act on behalf of EDP (subcontractors) must also provide guarantees of compliance with the requirements of privacy and protection of personal data.



## We must

01.

Ensure that for each new project or activity involving the processing of personal data, an assessment is conducted to guarantee its compliance with legal requirements and to mitigate any risks that may impact the privacy of data subjects.

02.

Adequate the processing of personal data to duly legitimised purposes, namely ensuring that only strictly necessary personal data is collected and that access to it is based on a "need-to-know" basis.

03.

Provide data subjects with all relevant information about the data processing being carried out, including the purposes for which the data will be used, how long it will be retained, and whether, and with whom, it will be shared.



04.

Respect the rights of rightsholders and ensure prompt response to requests for exercise of rights received.

05.

Ensure that data processing and storage is carried out securely by applying appropriate technical and organisational measures

06.

Immediately and appropriately react in case of a personal data breach, promptly reporting it to the Ethics & Compliance.

07.

Ensure that suppliers who carry out the processing of personal data on behalf of EDP, comply with the applicable personal data protection and security rules.

## We must not

01.

Use personal data without legitimate grounds for doing so.

02.

Share personal data with third parties without the explicit consent of the data subject or other lawful basis.

03.

Transfer personal data outside its country of origin without first obtaining advice from Legal & Governance or Ethics & Compliance.

04.

Collect and process special categories of personal data such as health status, sexual orientation, political opinions, religion, racial origin, among others, outside the situations provided by law or without the explicit, free, informed and unequivocal consent of the holder.

05.

Retain personal data of the holders for longer than is actually necessary.



# Examples

## Question:

Our email distribution Service Provider has informed us that a significant number of emails to Customers have been sent to switched email addresses. I do not yet have information on what caused this error. Should I report it?



## Answer:

Yes. Whenever you become aware of an incident involving personal data and even if you do not yet have all the information on it, you should report it immediately to Ethics & Compliance.

## Question:

I know that one of our partners urgently needs to hire an accountant and I know that one of our clients has exactly the right profile. As it is for the benefit of the customer, can I provide their data to that partner?



## Answer:

No. The personal data we have access to shall not be processed for purposes other than the purpose for which it was collected, unless there is explicit consent of the data subject or other legal grounds for doing so.

## Question:

I am preparing a campaign of commercial offers to our customers, which includes gifts for personal use, and I think that it would be ideal to make the corresponding selection in an automated way, based on profiles and personal information. Can I do this?



## Answer:

No. Profiling and automated individual decision-making are only possible if there is explicit consent of the data subject or other legal grounds for doing so.

## Question:

I want to send a surprise birthday present to a colleague's house. I have asked the people management area to give me the address and they told me they can't do that because it would be "violating the colleague's right to privacy". As I think this is excessive, should I report it?



## Answer:

You should not report it. The answer you received is the correct one because we have to comply with the employee's right to protection and privacy of personal data, and its disclosure for purposes other than those that motivated its initial collection is not allowed.

Find out...



## Related information

[Ethics & Compliance](#)

[Personal Data Protection Policy](#)

[Whistleblowing Management Policy](#)



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Compliance | Personal Data Protection mailboxes:

[Portugal: compliance@edp.pt](mailto:compliance@edp.pt)

[Espanha: compliance.es@edpenergia.es](mailto:compliance.es@edpenergia.es)

[Renováveis: dataprotection@edpr.com](mailto:dataprotection@edpr.com)

[Renováveis – APAC: dataprotectionofficer@edp.com](mailto:dataprotectionofficer@edp.com)

[Brasil: https://portaldeservicos.edpbr.com.br/chamadoscompliance/](https://portaldeservicos.edpbr.com.br/chamadoscompliance/)

EDP Data Protection Officer (DPO)

[General EDP Portugal: dpo.pt@edp.com](mailto:dpo.pt@edp.com)

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[SU Eletricidade: dpo@sueletricidade.pt](mailto:dpo@sueletricidade.pt)

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[EDP Brasil: encarregadodedados@edpbr.com.br](mailto:encarregadodedados@edpbr.com.br)

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## 4.6

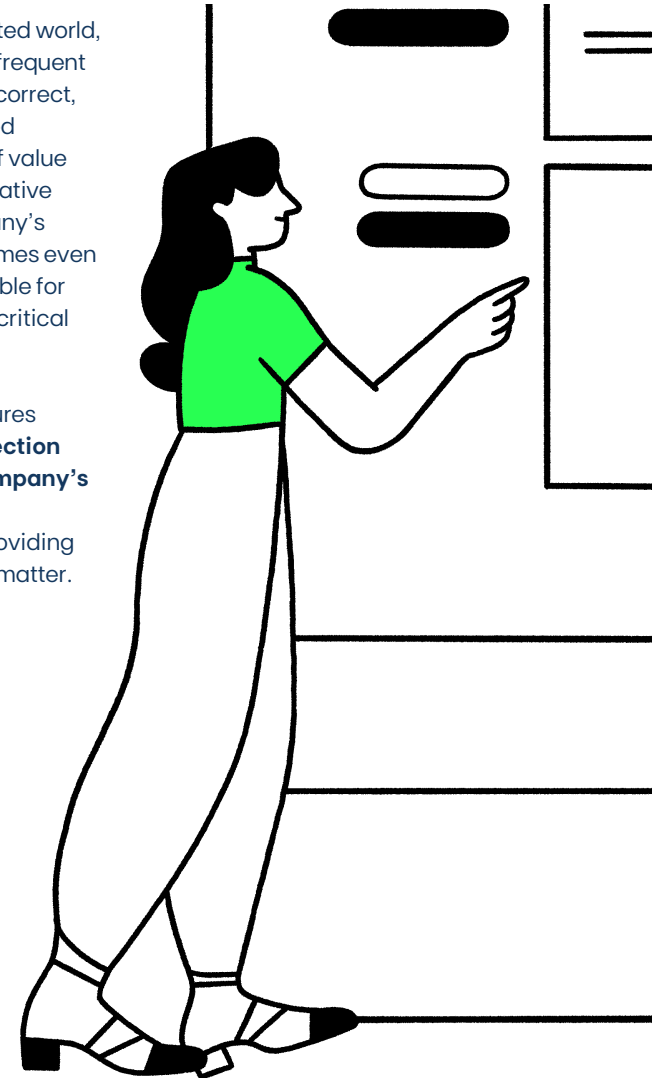
# Use of Company Information

**Information** is a fundamental business resource, so it's appropriate and responsible management is not only vital to generate added advantages over the competition in terms of innovation, institutional image and competitiveness along the value chain, but also to reduce the risk of its misuse, whether intentional or not.

Therefore, since information is an essential part of EDP's assets, we take care not only of its **confidentiality**, protecting it from disclosure to unauthorised persons, but also of its **integrity**, protecting it from undue alteration, and also of its availability, ensuring that it is accessible wherever and whenever it is needed.

In a permanently interconnected world, namely with the increasingly frequent use of social networks, any incorrect, inappropriate or wrongly timed information can lead to loss of value and generate substantial negative consequences for any company's image. At EDP, this fact becomes even more relevant as it is responsible for managing and safeguarding critical energy infrastructures.

EDP has policies and procedures that allow the adequate **protection and management of the Company's information** and that of its stakeholders in addition to providing training to employees on this matter.



## We must

01.

Keep all privileged, confidential and sensitive information secret at all times, communicating such information only to those who are legitimately entitled to it.

02.

Whenever we are aware of facts that may have a relevant influence on stock market prices: i) maintain this information under strict confidentiality; and ii) abstain from trading in securities of EDP companies, strategic partners or companies involved in transactions or relations with EDP or financial instruments related to them. we must do so until their official disclosure.

03.

Use the information to which we have access only for the purpose for which it was obtained, respecting the interests of the Company and of other parties.

04.

Ensure the integrity of the information, protecting it against undue changes, during input, processing and respective result, which may cause the loss of its accuracy and/or coherence.

05.

Ensure the availability of information so that it is accessible where and when needed.

06.

Ensure the development of adequate technical and organisational security mechanisms, reinforcing the safeguarding of information confidentiality.

07.

Protect confidential information by promoting a clean desk policy.

08.

Update, in accordance with the internal policy, passwords for access to computer systems.



## We must not

01.

Retain and/or disclose any internal information after leaving EDP, namely about the business, research and development, customers, related parties and employees.

02.

Use internal Company information and/or information gathered from other stakeholders for personal benefit or for the benefit of third parties.

03.

Discuss or work with confidential information in a public or even private area where confidentiality may be compromised.



# Examples

## Question:

I was invited to teach at a University, and I think it would be interesting if my students could analyse EDP's marketing campaigns. Can I discuss campaign strategies in class?



## Answer:

Campaigns are commercial products and assets of the Company which, moreover, may involve copyright. As such, they may not be used for other purposes without prior authorisation.

## Question:

I just found out today, overhearing a conversation between two directors, that the chances of a major project I'm working on being cancelled are high. No one has told me anything yet, but as my contract is up soon, I don't think it will be renewed. Can I post on my LinkedIn page saying that I might be available soon to take up a new professional challenge, because the project I am working on might be cancelled?



## Answer:

As an employee, you have a duty of loyalty to EDP and must not disclose information about its organisation, production methods or business. So, although you may be concerned, you cannot talk about the possibility of cancellation of the project you are working on to anyone, not least because it is a confidential matter that has not yet been publicly disclosed.

## Question:

I need to finish and send off for validation a report of a very important project I am involved in, however I am working in a public place and only have access to the data network that is available here. Should I connect to send the report as soon as possible?



## Answer:

You should not connect to that network as it is an unprotected network and the information it carries could be accessed inappropriately. If there is no other alternative, you should favour mobile data over public networks.

## Question:

I realized today that my domestic worker was very attentive to my weekly team meeting, which we conduct remotely. I don't know if he has overheard anything inappropriate on other occasions, particularly confidential information that I regularly discuss as part of my job. What should I do?



## Answer:

Some sensitive information may have been unintentionally shared with third parties. You should have a serious conversation with your domestic worker, ascertain any information that may have been shared, and ensure that your remote workspace has the necessary conditions to guarantee the confidentiality required for your duties. Considering the hybrid work model at EDP, it is also your duty to pay special attention to all individuals who may coexist in your remote workspace, ensuring that privileged, confidential, and/or sensitive information remains secure.



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## Related information

[Information Security Policy](#)

[Whistleblowing Management Policy](#)



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## 4.7 Use of Assets

The assets, whether tangible or intangible, of companies or third parties entrusted to us include the multiple and diverse resources that are made available to employees to carry out their daily work, including in the hybrid or remote model.

We have a duty to **protect and responsibly use the resources in our care**, including for example computers, vehicles, intellectual property and our own time, knowing that if misused or wasted, they adversely affect our individual and collective performance and therefore the value of the Company.

EDP has policies and procedures that ensure **the management of its own property assets** and those of third parties entrusted to it, with a view to **safeguarding their value**.



## We must

01.

Safeguard any assets, whether tangible or intangible, of EDP or third parties, entrusted to us, including IT systems and intellectual and industrial property, even if produced by us, using them only for the fulfilment of business processes and ensuring their efficient use, avoiding their theft or loss.

02.

Use any and all IT resources (hardware, software, application systems, email, internet and LAN network) in accordance with EDP's internal regulations.



03.

Respect inventions, intellectual works, models and industrial designs developed for the Company, and which are the exclusive property of EDP.

## We must not

01.

Use Company resources for personal purposes irresponsibly or without limitation. Limited and responsible use of communication tools (email, telephone, internet) may be acceptable as long as it does not interfere with our job responsibilities or with the requirements of applicable internal regulations.

02.

Use the assets of third parties (suppliers, partners, etc.) without the express authorisation of their owner.



03.

Use for personal reasons or share with third parties, technologies, methodologies, know-how and other information owned or entitled by EDP, its customers or suppliers.

04.

Disclose software or any other content that may cause damage to the Company's assets or those of third parties.

05.

Sell or donate EDP assets without proper authorisation.

## Examples

### Question:

Can I take home a piece of Company equipment that nobody uses anymore and that I could use?



### Answer:

No. Even if the item is at the end of its useful life, it should not be made available to anyone without proper authorisation. Even if the item is at the end of its useful life, it should not be made available to anyone without proper authorisation. All goods belong to the Company's assets, regardless of their current use.

### Question:

I inadvertently destroyed a set of documents and afraid of what might happen to me, I chose not to tell anyone. Now, my line manager is asking me about these documents, saying that they were sent to EDP, but that there is no record of their receipt. What should I do?



### Answer:

You will have to report that you unintentionally destroyed them and face the consequences. Not having reported the destruction of the documents at the time is serious, but not owning up to your mistakes, making it impossible to repair them and mitigate the consequences, is inadmissible.

## Find out...



### Related information

[Information Security Policy](#)

[Whistleblowing Management Policy](#)



### We give everyone a voice

Management

Ethics & Compliance

Ethics & Compliance Officer

[Speak up Channel](#)

Find out...

# Ethics Governance within the EDP Group

The effective implementation of the Code of Ethics requires a robust system of Ethics governance, which aims to ensure that everyone in the EDP Group acts in accordance with the principles established therein and is composed of various organizational instruments.

Through these instruments, EDP's Group top management interacts with all stakeholders, to pursue the desired ethical culture.

The main instruments have been defined and solidified within the Company over the years:

- A The General and Supervisory Board (CGS) appoints the Ethics Commission (EC), based on the proposal presented by the Executive Board of Directors (EBD). The GSB is also responsible for addressing issues related to the Code of Ethics.
- B The Group's Ethics Commission is responsible for analysing breaches of the Code of Ethics and internal regulations in force, reviewing the implementation of the annual ethics plan prepared by the Ethics & Compliance Officer, ensuring the adequacy of the Code of Ethics, and conducting its biennial revisions.
- C There is also an Ethics Commission at EDP Renewables, with the function of analyzing breaches of the Code of Ethics within that company.
- D The Corporate Governance and Sustainability Committee (CGSC) of the GSB is responsible for monitoring the activities of the Group's Ethics Committees and issuing recommendations it deems appropriate to the established procedures.
- E The Ethics & Compliance Officer is responsible for:
  - Promoting a culture of compliance based on the highest ethical standards;
  - Supporting the GSB and the EBD in defining, communicating, implementing, and evaluating objectives, policies, and management tools related to business ethics, and providing support to the EDP Ethics Commission, among others, in managing whistleblowing processes, respecting the commitments regarding confidentiality and the protection of the rights of the parties involved;
  - Coordinating and contributing to the implementation of policies and management tools related to business ethics, strengthening the ethical culture within the Group, namely through supporting the revision of the Code of Ethics, conducting training and awareness-raising activities, and ethical climate assessments.
- F The Ethics & Compliance supports the Ethics Commission and the Ethics & Compliance Officer in promoting the ethical culture and managing whistleblowing processes through specific Centers of Excellence.

# Glossary

## Definitions of Stakeholders

**EDP, EDP Group or Company:**

Set of companies that are in a controlling relationship with EDP Energias S.A., regardless of whether their head offices are in Portugal or elsewhere.

**Stakeholders:** People, entities or groups that may affect or be affected by EDP's activities, products or services and the performance associated with them, including, but not limited to, employees, shareholders, customers, suppliers, counterparties, business partners, competitors, public and regulatory authorities, patrons, and local communities.

**Shareholders:** Natural or legal persons that hold shares in EDP S.A. or EDP Renováveis, S.A.

**Customers:** Natural or legal persons to whom EDP provides services or sells products, both through a regulated regime and in liberalised markets.

**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.

**Communities:** Civil society organisations, institutions and entities representing citizenship, customers, business segments, media, research institutes, promotion and social development organisations.

**Competition:** It regulates all economic activity developed in the market economy, concerning the interplay of forces established between the supply and demand of goods or services, and regulates the behavior of economic agents, prohibiting the adoption of practices that have the purpose or effect of preventing, distorting, or restricting competition in the market.

**Suppliers:** Individuals or entities that supply products or provide services to EDP. This includes service providers. Including service providers.

## Other Definitions

**Environment:** Natural environment in which an organisation operates, including the air, water, soil, natural resources, flora, fauna, people, external space and their interrelationships <sup>i</sup>.

**Supply Chain:** Sequence of activities or partners which contribute with products or services to the organisation <sup>ii</sup>.

**Whistleblower:** A natural person who denounces or publicly discloses an infringement on the basis of information obtained in the course of their professional activity, regardless of the nature of that activity and the sector in which it is carried out. The following may be deemed to be whistleblowers: a) Employees in the private, social or public sector; b) Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction; c) Shareholders and persons belonging to administrative or management bodies or supervisory bodies of legal persons, including non-executive members; d) Volunteers and interns, paid or unpaid <sup>iii</sup>.

**Sustainable Development:**

Development that meets the needs of the present without compromising the possibility for future generations to meet their own needs<sup>iv</sup>.

**Business Ecosystems:** Network of organisations – including suppliers, distributors, customers, competitors, government agencies, etc. – involved in the delivery of a specific product or service through competition and cooperation. Each entity present in the ecosystem affects and is affected by the others, creating a constantly evolving relationship, in which flexibility and adaptability are determining characteristics.

**“Extended” company:** A company that carries out its activity relying not only on the provision of work and the knowledge of its employees, but also on the active collaboration of suppliers and partners in general and who are required, in turn, to undertake various commitments which include respect for the Code of Ethics, the Supplier Code of Conduct and other Policies and Codes of Conduct of the various business units of the parent company.

**Entrepreneurship:** Activity that involves the discovery, evaluation, and exploitation of opportunities to introduce new goods and services, ways of organising, markets, processes and raw materials through organising efforts that previously had not existed<sup>v</sup>.

**Equity:** The notion of having fair treatment and equal access to opportunities within an organisation or system, and the effort to identify and eliminate inequalities and barriers<sup>vi</sup>.

**Rule of law:** Legal and political systems, structures and practices, which condition a government’s actions to protect the rights and freedoms of citizens, maintain law and order, and encourage the efficient functioning of a country<sup>vii</sup>.

**Confidential and sensitive information:** Information and documentation not available to the public regarding the entire activity of the Company, particularly regarding the businesses, research and development, customers, related parties and employees.

**Integrity:** Behaviour and actions consistent with a set of moral and ethical principles and standards of conduct, adopted both by individuals and by institutions, which create a barrier against corruption<sup>viii</sup>.

**Assets:** Multiple and diversified resources, tangible or intangible, of companies or third parties one is entrusted with, examples of which are: Company money; Company products; computer systems and software; phones; photocopiers; Company vehicles; working hours of employees and their respective work products; tickets to performances or sporting events; patented information; registered trademarks of the Company.

**Precautionary Principle:** Moral and political principle that determines that if an action can cause irreversible public or environmental damage, in the absence of an irrefutable scientific consensus, the burden of proof lies on the side of those who intend to perform the act or action that may cause the damage. Its application in the area of the environment is mainly concerned with preventing possible harmful and irrecoverable effects, caused by actions that, although may not be scientifically and empirically proven to cause such damage, as a precaution, if there is no evidence of negative impacts, the action should not take place.



**Retaliation:** Application of reprisal or revenge; act or omission, including threats or attempts, that, directly or indirectly, occurring in a professional context, causes or may cause, unjustifiably, material or non-material damage.

**Transparency:** Openness to decisions and activities which affect society, the economy and the environment and willingness to ensure one's communication in a clear, accurate, timely, honest and complete manner <sup>ix</sup>.

- <sup>i</sup> NP ISO 26000 Guidelines on Social Responsibility
- <sup>ii</sup> NP ISO 26000 Guidelines on Social Responsibility
- <sup>iii</sup> Law 93/2021 establishing the general regime for the protection of whistleblowers | Law No. 93/2021 | DRE
- <sup>iv</sup> Report of the World Commission on Environment and Development: Our Common Future, United Nations
- <sup>v</sup> Report of the World Commission on Environment and Development: Our Common Future, United Nations
- <sup>vi</sup> Política de DEIP | Diversidade, Equidade, Inclusão e sentido de Pertença no Grupo EDP, 2022
- <sup>vii</sup> NP ISO 26000 Guidelines on Social Responsibility
- <sup>viii</sup> NP ISO 26000 Guidelines on Social Responsibility
- <sup>ix</sup> NP ISO 26000 Guidelines on Social Responsibility

Code of Ethics

# Our Energy

