



Policy

EDP Group Integrity Policy

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1. VERSION HISTORY

Version	Date of approval	Preparation	Approval	Comments	Main changes
1	15/05/2018	DAIC	EBD	Initial Issuance	-
2	02/12/2020	DCO	EBD	Revision	-
3	11/01/2022	DCO	EBD	Revision	-
4	25/10/2022	DCO	EBD	Revision	<ul style="list-style-type: none"> - Update of the chapter 'Terms and Definitions'; - Update of the following subchapters: 'Offers and Events'; 'Relations with Politically Exposed Persons'; 'International Sanctions'; 'Reporting channels'; - Update of the existing reporting channels; and - Provides for the obligation to sign an annual Declaration of compliance with this Policy.
5	23/05/2023	C&IC	EBD	Revision	<ul style="list-style-type: none"> - Update of the chapter 'Terms and Definitions' - definition of "Decision Maker" - as per approval of EBD 24/04/2023; - Update of the name of the Directions, as per new organizational model - OS 09/2022 EBD
6	-	Ethics & Compliance Global Unit	-	Revision	<p>Revised version on 01/04/2024 based on the new organizational model of the Group - merger of the Ethics Office with Compliance & Internal Control Global Unit.</p> <ul style="list-style-type: none"> - Update of the chapter 'Terms and Definitions' - Exclusion of the term Ethics Ombudsman. - Update of the department name to Ethics & Compliance Global Unit.

Considering:

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

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

2. PURPOSE

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

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

3. SCOPE

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

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

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

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

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

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

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

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

4. REFERENCES

- ISO 37301 – Compliance management systems;
- ISO 37001 – Anti-bribery management systems;
- Decree-Law n.º 48/95, of March 15th, amended by Law n.º94/2021, of December 21st (Portuguese Penal Code);
- Ley Orgánica 10/1995, of November 23rd (Spanish Penal Code);
- Law n.º 83/2017, of August 18th, amended by Law n.º 99-A/2021, of December 31st – measures for the fight against money laundering and terrorism financing;
- Law n.º 52/2019, of July 31st, which approves the regime for the exercise of functions by holders of political and high public offices;
- Decree Law n.º 109-E/2021, of December 9th, which creates the National Anti-Corruption Mechanism and establishes the General Regime for the Prevention of Corruption;
- Directive (EU) 2019/1937 of the European Parliament and of the Council, of October 23rd of 2019 on the protection of persons who report breaches of Union law;
- Law n.º 93/2021, of December 20th, which establishes the general regime for the protection of whistleblowers of breaches, transposing Directive (EU) 2019/1937 of the European Parliament and of the Council, of October 23rd of 2019;
- Directives (EU) 2018/843 of the European Parliament and of the Council, of May 30, 2018, which amends Directive (EU) 2015/849 of the European Union concerning the prevention of the use of the financial system for the purposes of money laundering or terrorism financing;
- Organization for Economic Cooperation and Development Standards (“OECD”);
- Financial Action Group Recommendations and Guides (“FATF”);
- Law n.º 12.846, of August 1st, 2013 (Brazil), which provides for the administrative and civil liability of legal entities for the practice of acts against the public administration, national or foreign, and makes other provisions;

- *Foreign Corrupt Practices Act (FCPA)* – United States of America;
- *Bribery Act* – United Kingdom.

5. TERMS AND DEFINITIONS

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

- Money Laundering** Act of conversion, transfer, assistance in or facilitation of any operation of conversion or transfer of advantages, obtained directly or indirectly, by the agent or by a third party, through the typical illicit acts provided for in Article 368.^o – A) of the Portuguese Penal Code, with the purpose of dissimulating their unlawful origin, or avoiding criminal consequences or prosecution for the agent or participant. The definition of money laundering, for preventive purposes, also includes participation in such acts, the association to practice them and the attempt and complicity in their practice, as well as facilitating their execution or advising someone to practice it.
- Employee:** The natural person hired by any of the EDP Group companies, on a permanent or temporary basis, under an employment contract or professional internship contract, including similar situations.
- Conflict of Interests:** Situation in which the purpose or the pecuniary or nonpecuniary advantages, whether related or unrelated, which a given employee intends to pursue or achieve with the practice of an action, is suitable to interfering with the performance of duties of impartiality, objectivity and compliance with the Code of Ethics by which the employee is bound in the pursuit of his/her duties or with the interests that the entity of the EDP Group must pursue.
- Corruption:** There are various types of corruption, but the following are the most relevant for the purposes of this Policy:
- Passive corruption (of a public official or holder of political office): The request, receipt or acceptance of the promise, directly or indirectly, of any undue advantages, for their own benefit or that of third parties, for the practice or abstention from the practice of an act in the exercise of their functions,

contrary or not to the duties of the position, even if prior to that request, receipt or acceptance of the promise;

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

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

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

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

Decision-maker

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

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

- (ii) EDP Group employees classified in job grades from 20 to 25 regardless of the EDP Group company with which they have a contractual relationship of in which they perform duties;
- (iii) Whenever the decision maker defined in (ii) identifies, as decision makers, other Group employees, with a job grade lower than 20, to whom he/she has attributed identical competencies;
- (iv) Whenever the EBD expressly qualifies EDP Group employees as decision-makers, indicating the respective scope of activity.

Top Management:

Managers or employees with a sufficiently high level of hierarchy to make decisions that affect EDP's exposure to the risk of non-compliance, not necessarily being a member of the management bodies. Members of management bodies and first-line directors who report directly to members of management bodies are generally understood as such.

Donations:

Contribution in cash or any other nature, granted to any third party, public or private, namely to entities whose activity consists predominantly in the realization of initiatives in the social, cultural, environmental, sports or educational areas.

Family / Close family members:

Spouse or cohabiting partner, relatives, by bloodline or marriage, up to the 2nd degree, in a direct line or in a collateral line, the cohabiting partners of such relatives, insofar as they do not benefit from the status of affinity, and also the people who, in other legal systems, have similar positions.

Terrorism Financing:

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

Public official:

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

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

- (xii) All those who exercise functions identical to those described in i) to viii) within the scope of any international organization governed by public law of which Portugal is a member;
- (xiii) Magistrates and officials of international courts, provided that Portugal has declared that it accepts the jurisdiction of these courts;
- (xiv) All those who exercise functions within the scope of extrajudicial dispute resolution procedures, regardless of nationality and residence;
- (xv) Jurors and arbitrators who are nationals of other States.

Facilitation payment:

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

Personal safety payment:

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

Designated individuals, entities or countries:

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

Sponsorship:

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

Politically Exposed Person ("PEP"):

Actual person who holds, or has held in the previous 12 months, in any country or jurisdiction, the following prominent public offices: i) Heads of State, Heads of Government and members of Government, specifically ministers, secretaries and under-secretaries of State or equivalents; ii) members of Parliament; iii) members of the Constitutional Court, the Supreme Court of Justice, the Supreme Administrative Court, the Court of Auditors, and members of the supreme courts, constitutional courts and other high-ranking judicial bodies of other States and international organizations; iv) representatives of the

Republic and members of the government bodies of the autonomous regions; v) Justice Ombudsman, Councilors of State, members of the National Data Protection Commission, the Higher Council of the Judiciary, the Higher Council of the Administrative and Tax Courts, the Office of the Attorney-General of the Republic, the Higher Council of the Public Prosecutor's Office, the Higher National Defense Counsel, the Economic and Social Council, and members of the Regulatory Body for the Media; vi) ambassadors and consuls; vii) General officers of the Armed Forces and the National Republican Guard (GNR) in active service, as well as the Chief Superintendents of the Public Security Police (PSP); viii) mayors and councilors with executive municipal council positions; ix) members of the boards of governors and supervisory boards of central banks, including the European Central Bank; x) members of the boards of governors and supervisory boards of public institutes, public foundations, public establishments and independent administrative entities, however designated; xi) members of the boards of directors and supervisory boards of state business sector entities, including the business, regional and local sectors; xii) members of the executive management bodies of national or regional political parties; xiii) directors, deputy directors and members of the board of directors or persons who hold equivalent positions in an international organization.

Persons recognized as being closely associated:

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

Prevarication:

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

Global Compliance Program / Compliance Management System:

Set of transversal compliance mechanisms, designed to promote and monitor compliance with relevant regulations in all activities, businesses and geographies in which the EDP Group is present.

Undue offer / receipt of advantage

The promise or offer / request or acceptance, directly or indirectly, of undue advantages to an Employee, a Holder of Political Offices or a third party, indicated by him or with his knowledge, resulting from the exercise of functions by the first or that take place because of these functions, except if it is a matter of socially appropriate conduct and in accordance with usages and customs.

Retaliation:

Application of retaliation, or revenge.

International Sanctions:

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

Third party:

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

Holders of other political or public offices:

Natural persons who, not being qualified as politically exposed persons, perform or have performed, in the last 12 months and in national territory, the positions listed in articles 2 and 3 of Law no. 52/2019, of 31 of July, which approves the exercise of functions by holders of political offices and high public offices. These are the following positions:

- (i) Candidates for President of the Republic;
- (ii) The President of the Assembly of the Republic;
- (iii) The Representative of the Republic in the Autonomous Regions;
- (iv) Members of executive bodies of local government and holders of senior management positions of the 1st and 2nd degrees, and equivalent, and top managers of the services of city councils and municipal services, when they exist;
- (v) Members of Organs executive bodies of metropolitan areas and intermunicipal entities;
- (vi) Members of the management body of a company owned by the State, when designated by the latter;
- (vii) Holders of senior management positions of the 1st and 2nd grades, and equivalent, and top managers of municipal chambers and municipal services, when they exist;
- (viii) The heads of cabinet of members of the Republic and regional governments;
- (ix) Representatives or consultants mandated by the Republic and regional governments in processes for granting or disposing of public assets.

Additionally, for the purposes of this policy, members of top structures of General Directorates and political candidates must also be considered holders of other public offices.

Bribery:

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

Employee of the private sector:

Person who exercises functions, including those of management or supervision, under an individual

employment contract, provision of services or in any other capacity, even if provisionally or temporarily, for remuneration or free of charge, at the service of an entity in the private sector.

Influence Peddling:

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

On its passive side, it corresponds to the request, receipt or acceptance of the promise, directly or indirectly, of any undue advantages, for its own benefit or that of third parties, so that the beneficiary abuses its influence, real or supposed, with any public entity.

Unlawful advantages:

Proceeds from the commission, in any form of co-participation, of the unlawful acts that constitute the offences of incitement to prostitution, sexual abuse of children or underage dependents, pornography of minors, computer and communications fraud, extortion, abuse of a guarantee or credit card, counterfeit currency or equivalent securities, depreciation of the value of currency or equivalent securities, passing of counterfeit currency in collusion with the counterfeiter, or equivalent securities, passing of counterfeit currency or equivalent securities, or acquisition of counterfeit currency to be put into circulation or equivalent securities, computer fraud, damage related to computer programs or other information technologies data, computer sabotage, illegitimate access, illegitimate interception or illegitimate reproduction of protected program, criminal association, terrorism, drug trafficking, arms trafficking, human trafficking, aid to illegal immigration, trafficking in human organs or tissues, damage to nature, pollution, activities dangerous to the environment, or danger to animals or plants, tax or social security fraud, influence peddling, undue receipt of advantages, corruption, embezzlement, employee fraud, harmful management in a public sector economic unit,

fraudulently obtaining or diverting a subsidy, grant or credit, corruption to the detriment of international trade or the private sector, insider trading or manipulation of the market, violation of the exclusive patent, utility model or topography of semiconductor products, violation of exclusive design rights, counterfeiting, imitation and illegal use of trademarks, theft, sale or concealment of products or fraud on goods and of offences punishable with a minimum term of imprisonment of six months or a maximum of over five years, as well as the obtained assets.

Undue advantages

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

6. DESCRIPTION AND RESPONSIBILITIES

i. EDP's Commitments

EDP Group is committed to pursue its activity in strict compliance with the laws and regulations in force, together with the promotion of responsible action and guided by the highest standards of ethics and integrity.

Compliance with the national and international legislation applicable to each entity in the EDP Group, as well as with this Policy and other internal policies, procedures and instruments of any kind approved and applicable, is compulsory, in any circumstance, and any acts or omissions that constitute a breach or infringement of such rules are not tolerated.

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

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

In this context, each EDP Group entity implements adequate procedures to prevent and mitigate the risk of occurrence of illicit practices in its activities, such as acts of corruption, prevarication, money laundering and terrorism financing, or insider trading/dealing.

Additionally, these entities also adopt the necessary procedures to detect eventual occurrences of this type and to communicate them to the competent authorities.

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

ii. Principles of Action

a. General Principles

All EDP employees, subsidiaries' and other Group entities employees as well as service providers' employees that act on behalf of any Group entity must know and fully comply with the procedures and rules set out in this Policy, ensuring that (i) they do not, and will not infringe it, (ii) comply with the set of legal and regulatory rules from national or international sources applicable to the activities undertaken, (iii) do not, and will not engage in any improper, irregular or unlawful conduct, (iv) do not, and will not adopt any unlawful action in the name of EDP Group entities, or in the exercise of functions or activities within the EDP Group, and (v) do not, and will not do any act, by action or omission, which may unlawfully or unduly favor third parties, directly or indirectly, either in the private sector or in the public sector.

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

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

- a) corruption,
- b) bribery, including facilitation payments;
- c) money laundering and terrorism financing;
- d) influence peddling;
- e) embezzlement, harmful management in a public sector economic unit;
- f) fraud, extortion;
- g) other crimes against justice;
- h) insider trading/dealing;

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

b. Preventing corruption

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

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

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

c. Prevention of money laundering and terrorism financing

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

EDP Group entities considered obliged to comply with the legislation and sectorial regulations related to the prevention of money laundering and terrorism financing, define and adopt policies, internal control procedures and risk management models that are effective and adequate to their operations, in accordance with best practices and in order

to comply with specific legal obligations in terms of anticipating, mitigating, preventing, identifying and monitoring this risk, as well as in what is related to the treatment of information, communication of suspicious operations and to the collaboration with competent authorities.

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

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

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

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

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

d. Facilitation payments

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

The making or acceptance of facilitation payments is strictly prohibited by this Policy, and any activity that may result in a facilitation payment made or accepted or that may suggest in any way that said payment, should be avoided.

However, recognizing that an employee may exceptionally be faced with situations where a payment is requested to avoid physical harm or an imminent threat to his health, safety and property, payments for personal safety are permitted under the aforesaid exceptional situations¹.

These payments shall, if circumstances permit, be preceded by consultation with Ethics & Compliance Global Unit.

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

e. Contributions to Political Parties

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

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

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

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

f. Gifts and Events

The offer or acceptance of goods, services, participation in events or other advantages, even if free of charge, is likely to be interpreted as being associated with undue advantages

¹ Examples of these situations are:

- Being stopped by individuals identifying themselves as police, military, or paramilitary personnel who demand a payment in order for you to pass through or to avoid retention of identification documents;
- Being threatened with imprisonment for alleged infringement (e.g. traffic offence) unless a payment is made.

or the commission of the crime of corruption, undue receipt of advantage or other related offenses. In this context, both offers given to third parties and offers received by employees of any EDP Group entities are relevant.

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

Regardless of the respective value, the acceptance, promise or assignment of offers contrary to the high ethical standards that guide the activities of the EDP Group and which are included in this Policy is prohibited. In particular, acceptance, promise or assignment of offers is strictly prohibited in the following cases:

- (i) in cash or financial instruments, or other values or instruments of a fungible nature;
- (ii) when the parties are involved in negotiations, bidding, contractual review / renewal processes;
- (iii) in other situations that may generate some undue benefit or are likely to create a conflict of interest for any of the parties involved;
- (iv) that have an illegal or improper purpose or are contrary to the applicable laws and regulations and
- (v) that are likely to resemble any of the situations mentioned above or when they have a socially reprehensible nature and / or that may jeopardize the good name and reputation of the EDP Group entities, and/or of the one who receives or gives them.

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

g. Donations and Sponsorships

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

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

h. Conflict of Interests

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

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

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

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

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

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

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

i. Relations with Politically Exposed Persons (PEPs)

The relationship of the EDP Group companies, employees and service providers acting on their behalf with PEPs, holders of political or public office, public officials and close family members or persons recognized as being closely associated to the aforementioned, as well

as with any holder of public functions, must reflect a conduct of honesty, integrity and transparency, in any and all interactions, whether direct or indirect, active or receptive, ensuring compliance with applicable legislation and defined internal procedures.

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

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

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

j. Third Party Integrity Due Diligence

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

In this context, EDP Group companies, in order to assess and mitigate the integrity risk of the counterparties with whom they relate, must ensure that they know, evaluate and mitigate the integrity risks associated with the business relationships and transactions that they intend to establish, particularly with suppliers, contractors, business partners / counterparties and M&A, beneficiaries of sponsorships and donations, job candidates and other counterparties subject to anti-money laundering and anti-terrorism financing legal requirements.

k. International Sanctions

EDP Group is committed to preventing money laundering, combating the financing of terrorism and other crimes, committing itself to taking into account international sanctions

applicable to its business relationships and respective counterparties, in accordance with their legal obligations and specific procedures developed for such purpose.

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

Sanctions can take different forms, including:

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

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

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

- List of any economic, financial or business restrictive measure, as well as any trade and arms embargoes imposed by the EU in accordance with Chapter 2 of Title V of the Treaty on European Union and Article 215 of the Treaty on the Functioning of the Union European Union, as available on the official EU website, including any changes or additions that may exist on this or any official website;
- List of any restrictive, economic, financial or trade measures, as well as any trade and arms embargoes issued by the United Nations Security Council in accordance with Article 41 of the Charter of the United Nations, available on the official website of the United Nations, including any alteration or addition that may exist on this or any official website;
- List of individuals and entities owned or controlled by, or acting on behalf of or on behalf of targeted countries, identifying individuals, groups and entities, such as terrorists or narcotics traffickers – List of Specially Designated Nationals and Blocked Persons (SDN) managed by the Office of Foreign Assets Control (OFAC), part of the US Department of the Treasury, including any changes or additions there may be; and
- List of any economic, financial and trade restrictive measures and arms embargoes issued by the UK Government (including but not limited to those made available on the official UK website), including any changes or additions that may exist.

iii. Compliance Programs

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

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

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

a. Responsibilities and Resources

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

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

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

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

- Supervising the established risk culture in relation to Compliance, as well as the tone at the top;

- Approve and ensure the follow-up of the Ethics & Compliance Global Unit's Activities Plan;
- Supervise compliance with regulations and the alignment of business processes with the requirements of the Compliance Management System.

Ethics & Compliance Global Unit is responsible for promoting the development of the Compliance Management System and of the Specific Compliance Programs, fostering a compliance culture and ensuring, namely, the identification, assessment, monitoring and reporting of the legal and regulatory non-compliance risks, providing mechanisms that promote compliance and also proactively and systematically advising the organization.

Ethics & Compliance Global Unit and the Compliance function, in the exercise of their activity and while ensuring their authority and independence, must have:

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

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

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

b. Risk Assessment

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

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

c. Procedures and Internal control mechanisms

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

d. Training and Communication

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

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

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

Ethics & Compliance Global Unit is responsible for promoting communication, dissemination and training on this Policy and other related internal procedures and is always available to clarify any doubt.

The communication and training to be provided and the respective periodicity must be appropriate to the function of each employee and respective exposure to Compliance risks. It shall also be ensured that the training plan is in line with any updates to this Policy and related procedures, in order to ensure the employees constantly updated knowledge.

e. Contact and whistleblowing channels

EDP Group provides several channels for contacting and whistleblowing reports (identified in Annex I of this Policy) and encourages all its employees to report any type of behavior

that, in good faith, they consider to be in violation of this Policy, the Code of Ethics of the EDP Group, the law, regulations, policies and procedures implemented by the EDP Group.

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

The reporting channels allow for the safe submission and follow-up of complaints, guaranteeing their independence and impartiality, integrity and conservation.

The complaint may be filed anonymously. In any case, the information contained in the complaint is confidential and is protected against unauthorized access, guaranteeing the protection of personal data.

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

A response is ensured to all situations that are communicated.

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

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

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

Ethics & Compliance Global Unit monitors the complaints related to the practice of illegal acts in the scope of this Policy, in order to ensure the identification and mitigation of risk situations and, to this end, the areas responsible for receiving these complaints should inform Ethics & Compliance Global Unit of their occurrence.

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

f. Monitoring, Continuous Improvement and report

Ethics & Compliance Global Unit responsible for promoting appropriate mechanisms and procedures for monitoring the Global Compliance Program, and must also monitor the respective development, including in particular:

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

When it becomes aware of situations of non-compliance or misalignment with this Policy, the Ethics & Compliance Global Unit shall, namely:

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

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

g. Audit

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

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

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

iv. Annual declaration of compliance with the principles of integrity

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

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

Failure to comply with this Policy will have the disciplinary consequences provided for in the Collective Bargaining Agreement and in the applicable labor legislation, and may, in the limit, result in dismissal.

If applicable, non-compliance also gives rise to reports to the competent authorities, for the purpose of determining the criminal, administrative, civil or other liability of the agents, which, in turn, may determine, namely, the condemnation of those involved in the payment of damages or fines, while serving a prison sentence, or banning the exercise of activity, restricting the receipt of loans, subsidies or public incentives, loss of assets, dissolution of the company, among others.

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

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

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

7. FINAL PROVISIONS

Any question regarding the interpretation or the application of this Policy and related procedures should be directed to Ethics & Compliance Global Unit, which will provide advice on the most appropriate way of acting.

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

APPENDIX I – Contacts**Whistleblowing channels:**

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

C&IC Contacts:

E-mail address: compliance@edp.pt