



# **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"> <li>- Update of the chapter 'Terms and Definitions';</li> <li>- Update of the following subchapters: 'Offers and Events'; 'Relations with Politically Exposed Persons'; 'International Sanctions'; 'Reporting channels';</li> <li>- Update of the existing reporting channels; and</li> <li>- Provides for the obligation to sign an annual Declaration of compliance with this Policy.</li> </ul>
5	23/05/2023	C&IC	EBD	Revision	<ul style="list-style-type: none"> <li>- Update of the chapter 'Terms and Definitions' - definition of "Decision Maker" - as per approval of EBD 24/04/2023;</li> <li>- Update of the name of the Directions, as per new organizational model - OS 09/2022 EBD</li> </ul>
6	-	Ethics & Compliance (E&C)	-	Revision	<p>Revised version on 01/04/2024 based on the new organizational model of the Group - merger of the Ethics Office with Compliance &amp; Internal Control Global Unit.</p> <ul style="list-style-type: none"> <li>- Update of the chapter 'Terms and Definitions' - Exclusion of the term Ethics Ombudsman.</li> <li>- Update of the department name to Ethics &amp; Compliance (E&amp;C).</li> </ul>
7	17/03/2025	Ethics & Compliance (E&C)	EBD	Revision	<p>Revision of the chapter 'Terms and Definitions' – adoption of global definitions for Corruption and Money Laundering, update of the definitions of PEPs and Decision-Makers in accordance with adjustments in internal procedures, and inclusion of an explanation about the approval bodies in EDP and EDPR.</p> <p>Strengthening of the document as a global procedure and reinforcement of the role of E&amp;C as BEF. Alignment of the</p>

					<p>Principles of Action with new internal processes, including the adaptation of the subitem related to PEPs and the mention of the EDP Group Sponsorship Policy.</p> <p>Adjustment in the timeframe for making the Annual Declaration available to Decision-Makers and Employees classified as PEPs or Equivalent.</p>
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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 carried out through the transition of the operating model, 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 since its implementation in 2018;
- 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 Group's active role in promoting integrity and preventing unlawful acts.

## **2. OBJECTIVE**

This policy aims to define the general principles of action and duties for EDP Group companies, its directors, employees, and business partners, in order to avoid 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 contributing 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 Renewables), EDP España, S.A. (EDP Spain) and EDP – Energias do Brasil, S.A. (EDP Brazil). This policy also applies to Fundação EDP, Fundación EDP and Instituto EDP – which, for the purposes of this policy, will be considered as 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 to ensure compliance with all applicable laws and the principles that bind the Group and its entities.

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

Local documents 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, should be submitted for consultation and review by Ethics & Compliance (E&C) and by Legal & Governance (L&G) of the EDP Group, ensuring proper coordination so that such policies or procedures remain consistently aligned with the principles established in this Policy and other related procedures.

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

EDP Group's representatives in joint ventures and/or in companies where the EDP Group does not hold a controlling position will always ensure the observance of the provisions of this Policy in their respective functions and endorse the application of its principles or similar principles in those companies, namely by promoting the development of specific policies and procedures to ensure compliance.

### 4. REFERENCES

- Code of Ethics of EDP Group;
- ISO 37301 – Compliance management systems;
- ISO 37001 – Anti-bribery management systems;
- UNE 19601, Criminal Compliance Management System;
- Decree-Law n.º 48/95, of March 15<sup>th</sup>, amended by Law n.º94/2021, of December 21<sup>st</sup> (Portuguese Penal Code);
- Decree-Law n.º 109-E/2021, of December 9, which establishes the National Anti-Corruption Mechanism and defines the General Corruption Prevention Regime;
- Ley Orgánica 10/1995, of November 23<sup>rd</sup> (Spanish Penal Code);
- Brazilian Law n.º 12,846, of August 1, 2012, which addresses the administrative and civil liability of legal entities for acts committed against the national or foreign public administration

and provides other provisions & Decree-Law n.º 11,129, of July 11, 2022, which regulates Law n.º 12,846, of August 1, 2013;

- Foreign Corrupt Practices Act (FCPA) – United States of America;
- Bribery Act – United Kingdom;
- Law n.º 83/2017, of August 18<sup>th</sup>, amended by Law n.º 99-A/2021, of December 31<sup>st</sup> – measures for the fight against money laundering and terrorism financing;
- 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”) directives;
- Financial Action Group Recommendations and Guides (“FATF”);

## 5. TERMS AND DEFINITIONS

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

<b>Money Laundering</b>	The act of concealing or disguising the illicit origin of financial resources, making them appear legitimate through financial operations, transactions, or other actions aimed at avoiding detection or criminal punishment. This includes any form of participation, attempt, or facilitation of such activities.
<b>Candidates for Public Office</b>	Individuals who are currently formally registered as candidates for significant public functions at the national, regional, local, or international level.
<b>Employee</b>	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. For the purposes of this policy, references to employees include members of the governing bodies of EDP Group companies and other entities).
<b>Conflict of Interests</b>	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.
<b>Corruption</b>	The practice of abusing power or trust to obtain illegitimate personal advantages. Corruption involves influencing or diverting legal, political, or administrative processes, harming transparency, justice, and the public interest.

<b>Decision-maker</b>	<p>The following individuals will be considered decision-makers as they, by virtue of their functions, have authority and responsibility, either directly or indirectly, for the planning, direction, and control of activities within the EDP Group, as described below:</p> <p>Members of the corporate bodies of EDP and its controlled companies;</p> <p>EDP employees classified within job grades 84 to 90, regardless of the EDP Group company with which they have a contractual relationship or where they perform their duties;</p> <p>Whenever the decision-maker defined in (ii) identifies other EDP Group employees with a job grade lower than 84 as decision-makers, to whom they have assigned similar responsibilities;</p> <p>Whenever the EBD expressly qualifies EDP Group employees as decision-makers, specifying their scope of activity and delegation of responsibilities.</p>
<b>Donations</b>	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.
<b>Equivalents</b>	Individuals who, although not holding positions classified as a Politically Exposed Person (PEP), have relationships with them, such as family members and individuals recognized as closely associated.
<b>Close Family Members<sup>1</sup></b>	<p>Family members of a Politically Exposed Person, whether by blood, marriage, or similar forms of civil partnership:</p> <ul style="list-style-type: none"> <li>(i) The spouse or a person equivalent to a spouse;</li> <li>(ii) The children and their respective spouses or persons equivalent to a spouse;</li> <li>(iii) The parents.</li> </ul>
<b>Terrorism Financing</b>	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.
<b>Facilitation payment</b>	Facilitation payments are unofficial payments, typically of small value, made in cash or in kind to an official to ensure or expedite a decision, procedure, or other lawful action to which the party is already entitled.
<b>Personal safety payment</b>	Payment made to a public official to ensure health or an individual personal security facing a serious risk.
<b>Sponsorship</b>	Contribution in cash or in kind, granted to public or private entities to promote the sponsor's name, image, brand activities or products.
<b>Politically Exposed Person ("PEP")<sup>1</sup></b>	<p>Individuals who are or have been, within the last two years, entrusted nationally or internationally with prominent public functions, including but not limited to:</p> <ul style="list-style-type: none"> <li>(i) Heads of State, Heads of Government, Ministers, Deputy Ministers, and Secretaries of State;</li> <li>(ii) Members of parliament or similar legislative bodies;</li> <li>(iii) Members of the governing bodies of political parties;</li> <li>(iv) Members of supreme courts, constitutional courts, or other high-level judicial bodies whose decisions are not subject to appeal, except under exceptional circumstances, as well as members of courts of auditors and governing bodies of central banks;</li> </ul>



	<p>(v) Ambassadors, chargés d'affaires, and high-ranking officers in the armed forces;</p> <p>(vi) Members of administrative, managerial, or supervisory bodies of state-owned enterprises, directors, deputy directors, and board members, or individuals performing equivalent functions in an international organization.</p>
<b>Persons recognized as being closely associated<sup>1</sup></b>	<p>Individuals who have a close connection with a Politically Exposed Person ("PEP"):</p> <p>Any individual who has joint beneficial ownership of legal persons or legal entities with a PEP;</p> <p>Any individual who maintains close business relations with a PEP;</p> <p>Any individual who has beneficial ownership of any legal person or legal entity whose sole beneficial owner is a PEP.</p>
<b>Global Ethics &amp; Compliance Program / Compliance Management System</b>	The set of activities through which the organization identifies objectives and risks and determines the structure, processes, and resources necessary to achieve the desired compliance management outcomes. The Compliance Management System is based on the development of the Global Ethics and Compliance Program and the Specific Compliance Programs.
<b>Offers &amp; Events</b>	The granting and acceptance of offers, invitations to institutional or non-institutional events, and other similar benefits.
<b>Management Bodies</b>	Reference to the Executive Board of Directors (EBD) in the case of EDP S.A., and to the Management Team in the case of EDP Renováveis, S.A..
<b>Supervisory Bodies</b>	Reference to the General and Supervisory Board (GSB) of EDP, which oversees and supervises the management of the company, delegating to the Financial Matters Committee (FMC) the supervision of the Ethics and Compliance area. In the case of EDPR, this role falls to the Board of Directors (BoD), which delegates to the Audit, Control, and Related Parties Committee (AUDC) the supervision of financial information, internal control, risk management, and compliance matters.
<b>Retaliation</b>	Application of retaliation, or revenge.
<b>International Sanctions</b>	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.
<b>Third party</b>	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.
<b>Bribery</b>	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.
<b>Influence Peddling</b>	Influence peddling refers to the act of a person, directly or indirectly, offering, requesting, or receiving any form of undue advantage with the intent to influence or attempt to influence a decision or action of a public or private authority in the exercise of their functions, for personal benefit or the benefit of third parties.

<sup>1</sup> This definition may be subjected to local adjustments in accordance with specific legislation. For more details on possible variations, please consult the Procedure for Politically Exposed Persons and Equivalents.

<b>Undue advantages</b>	An advantage that is not allowed under applicable laws, this Policy or other binding regulations of the EDP Group entities.
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## 6. DESCRIPTION AND RESPONSIBILITIES

### *i. EDP Group's Commitments*

EDP Group is committed to conduct its activity in strict compliance with applicable laws and regulations, as well as promoting responsible action guided by the highest standards of ethics and integrity.

Compliance with applicable legislation to each entity in the EDP Group, as well as with this Policy and other internal policies, procedures, and instruments applicable, is compulsory, in any circumstance, and any acts or omissions that constitute a breach or infringement of such rules will not be 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 act in accordance with this commitment.

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

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.

EDP Group entities will only formalize 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's 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 a 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 strictly forbidden:

- corruption,
- bribery, including facilitation payments;
- money laundering and terrorism financing;
- influence peddling;
- embezzlement, harmful management in a public sector economic unit;
- fraud, extortion;
- other crimes against justice;
- insider trading/dealing;
- crimes against data protection and privacy;
- breach of information security and cybersecurity rules;
- crimes against environment and safety;
- antitrust/anti-competitive practices;
- practices that violate tax legislation;
- non-compliance with requirements for the preparation and reporting of financial and accounting information;
- financing or association of EDP's brand to political parties, candidates, campaigns, political candidacy structures or related persons or entities;
- 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 and Equivalents, 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's entities may only enter in business and transactions with customers and partners whose commercial activities are lawful and whose funds come from lawful sources.

EDP Group's 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 the 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 collaborating with competent authorities.

EDP Group's 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 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, 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, entities that do not initiate or immediately terminate the business relationship, analyze the possible reasons for not obtaining the elements, means or information, and whenever the respective assumptions are verified, should 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's 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***

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, must 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 is permitted in these exceptional situations<sup>2</sup>.

These payments should, if circumstances permit, be preceded by consultation with E&C.

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

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<sup>2</sup> 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.

**e. Contributions to Political Parties**

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

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

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

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

**f. Gifts and Events**

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

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

Regardless of the respective value, the acceptance, promise or assignment of offers contrary to the high ethical standards that guide the activities of the EDP Group included in this Policy is prohibited. 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 or within a period of 60 days before or after any of these moments, except when they fall under common courtesy practices appropriate to the specific context;
- (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, on behalf of or 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 servicing the EDP Group, must not to occur

***g. Donations and Sponsorships***

The granting of any kind of benefit to external entities, in the form of sponsorships or donations, should 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 this Policy, as well as obeying the specific rules in the social investment policy, the EDP Sponsorship and/or Commercial Brand Policy and other applicable internal procedures.

Benefits may only be granted to reputable entities, subject to an integrity analysis in accordance with the obligations defined in the internal third-party integrity due diligence procedures. Proper due diligence must be conducted for this purpose, and these entities are also required to account for the use of the financial or in-kind resources they have received.

***h. Conflict of Interests***

The EDP Group is committed to establishing effective mechanisms to identify, assess, and mitigate conflicts of interest risks, ensuring that all decisions are made impartially.

Employees must not engage in any activity that may potentially conflict with the interests of the EDP Group. They must ensure that their personal, family, or close interests never take precedence over the interests of EDP and its stakeholders.

Family relationships, financial interests, or external professional commitments may give rise to conflicts of interest and are therefore subject to the rules defined in internal procedures regarding transactions with related parties and the prevention of conflicts of interest.

All employees who find themselves in a real or potential conflict of interest situation must report it to E&C and refrain from any influence or participation in related decisions until E&C issues its recommendations.

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

***i. Relations with Politically Exposed Persons (PEPs) and Equivalents***

The relationship of the EDP Group companies, employees and service providers acting on their behalf with PEPs and Equivalents, 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.

Interactions between EDP Group Employees and PEPs (Politically Exposed Persons) or Equivalent Individuals may be subject to internal records. Regarding interactions maintained by service providers acting on behalf of or in the direct or indirect interest of any EDP Group company or entity, these must be reported by the providers to the departments/directorates that engage them. These departments, in turn, must ensure that such interactions are reported to E&C.



Employees who are designated as PEPs, are at risk of becoming PEPs, or qualify as Equivalent Individuals, as well as those whose status has changed, must notify E&C.

The specific rules to be observed regarding this matter are embodied in the PEPs and Equivalent Procedure.

#### ***j. Third Party Integrity Due Diligence***

To deepen and reinforce the general principles of conduct and the duties established in this Policy and in the EDP Group Code of Ethics, EDP Group entities, aligning their business operations with market best practices and in strict compliance with applicable laws and regulations, have defined and implemented third-party integrity due diligence procedures. These procedures strengthen mechanisms for preventing and combating illicit acts, particularly behaviors associated with corruption, bribery, money laundering, and terrorism financing.

In this context, EDP Group entities, for the purposes of integrity risk assessment and mitigation concerning their counterparties, must ensure that they identify, evaluate, and mitigate integrity risks associated with business relationships and transactions they intend to establish. This applies particularly to suppliers, service providers, business partners, clients, intermediaries, mergers, and acquisitions (M&A) transactions, sponsorship and donation beneficiaries, job applicants, and other counterparties of EDP Group entities that are subject to legal requirements for anti-money laundering and counter-terrorism financing prevention.

#### ***k. International Sanctions***

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

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 ensure that business relationships are established taking into account the international sanctions provided in the procedures in use, 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;
- 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 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***

The Management Body is 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 Management Body within the scope of the Compliance Management System are:

- Establish a risk culture regarding Ethics & Compliance, as well as the “tone at the top” in relation to the matters addressed here;
- Approve Policies and Procedures issued by E&C;
- Define and approve the EDP Group Compliance Management methodology and the Compliance Management System Standard, ensuring its alignment with the Group's strategy;
- Approve and ensure the implementation of the Global Ethics & Compliance Program and Specific Compliance Programs;
- Decide and approve measures to be adopted in cases of significant non-compliance;
- Ensure an adequate allocation of financial, technical, and human resources, as well as access to decision-making bodies and all necessary information within the scope of the E&C function, to ensure the proper fulfillment of its responsibilities;
- Demonstrate the importance of effective compliance risk management and the alignment of business processes with the requirements of the Compliance Management System;
- Raise awareness, guide, and support the organization in promoting everyone's contribution to a solid Compliance Management System, embedded within business processes;
- Define Ethics & Compliance objectives within the employee performance evaluation procedure;



The Supervisory Body is independent and responsible for:

- Supervise the established risk culture regarding Compliance, as well as the “tone at the top” in relation to the matters addressed in this Policy;
- Approve and ensure the supervision of the Ethics & Compliance Activity Plan;
- Consider and monitor recommendations on actions to be taken in situations involving significant non-compliance;
- Supervise regulatory compliance and the alignment of business processes with the requirements of the Compliance Management System.

E&C 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 proactively and systematically advising the organization.

E&C and the Ethics & Compliance Officer (ECO), 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 the necessary skills, knowledge, and experience related to the nature of the business and the energy sector;
- Ability to access and communicate with the Management Body, the Supervisory Body, decision-makers, and other relevant responsible managers;
- Unlimited access to information and documentation necessary for carrying out activities, while ensuring compliance with applicable legal regulations;
- The ability to seek 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.

### ***b. Risk Assessment***

EDP Group maintains 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, EDP Group develops procedures and implements 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 procedures within a reasonable period after they start working at any EDP Group entity.

E&C should provide training regarding 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.

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

It should also be ensured that the training plan is in line with any updates to this Policy and related procedures, to ensure the employees constantly updated knowledge.

***e. Contact and whistleblowing channels***

The EDP Group provides multiple whistleblowing communication channels, encouraging all stakeholders, particularly employees, to report behaviors they believe constitute a violation of the Code of Ethics, this policy, or other regulations, policies, and procedures of the EDP Group. Reports can be made anonymously or with identification and are always kept confidential and protected against unauthorized access.

The whistleblowing management system in place ensures that all received reports are handled independently and impartially, guaranteeing the integrity and preservation of the collected information. The EDP Group ensures protection, non-discrimination, and non-retaliation for whistleblowers who, in good faith, report improper or non-compliant practices.

E&C monitors reports related to illegal activities, ensuring the identification and mitigation of risk situations.

For further details, the EDP Group Whistleblowing Management Policy should be consulted.

***f. Monitoring, Continuous Improvement and report***

It is the responsibility of E&C to promote mechanisms and procedures for monitoring the Global Compliance Program, ensuring the updating of methodologies, regulatory documents, and controls, as well as overseeing reports and implementing defined measures.

Whenever non-compliance or misalignment with this Policy is identified, E&C must analyze the causes and consequences, adopt mitigating measures, identify and promote corrective actions, and monitor their implementation.

E&C regularly reports to the Management Body and the Supervisory Body on monitoring activities and continuous improvement.

**g. Audit**

The Internal Audit (IA) 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, 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 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 PEPs and Equivalents must submit a declaration created for this purpose, made available by E&C in the first quarter of the current year, 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 Agreements and, when applicable, labor legislation, and may, in the limit, result in dismissal.

If applicable, non-compliance may also be reported 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 E&C, which will provide advice on the most appropriate way of acting.

E&C 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 when new elements emerge that demonstrate its non-integral adequacy, submitting the change proposals to the approval of the EDP's Management Body.

**APPENDIX I – Contacts****Whistleblowing channels:**

- i. Speak Up channel EDP: <https://www.edp.com/pt-pt/sobre-nos/edp/speak-up>
- ii. Canal Speak up channel EDPR: <https://www.edpr.com/pt-pt/speak-up>
- iii. Ethics channel (EDP Brasil): <https://www.edp.com.br/canal-de-etica/>

**Contact channel with the Data Protection Officer:**

- i. EDP Spain: [DPD.ES@epdenergia.es](mailto:DPD.ES@epdenergia.es)
- ii. EDP Renewables: [dataprotection@edpr.com](mailto:dataprotection@edpr.com)
- iii. EDP Brazil: [suaprivacidade@edpbr.com.br](mailto:suaprivacidade@edpbr.com.br)
- iv. Portugal: [dpo.pt@edp.com](mailto:dpo.pt@edp.com); [dpo@sueletricidade.pt](mailto:dpo@sueletricidade.pt); [dpo@e-redes.pt](mailto:dpo@e-redes.pt)
- v. Other Geographies: [dpo.pt@edp.com](mailto:dpo.pt@edp.com)

**Contact channel:**

- i. E&C: [compliance@edp.com](mailto:compliance@edp.com)