

Code of Ethics

# Our Energy



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## 1 Persons responsible for publication

### **Preparation and revisions**

Ethics Ombudsperson's office (EOO).

### **Approval**

General and Supervisory Council (CGS).

### **Adaptation**

EDP Brazil Compliance Team

## 2 Revisions and updates

This version of EDPBR's Code of Ethics, which includes Annexes A B and C, has been approved and replaces the 2020 EDP Code of Ethics.

The company's Code of Ethics is reviewed every two years, without prejudice to potential specially-mandated revisions, if justified.

Note: the interactive digital version of the Code of Ethics, which is exclusively available to employees from the EDP Group, is considered to be the current version and may include specific changes in content with regards to related documents. These alterations will be published in each revision, whether such revisions are carried out periodically or in an extraordinary manner.

## 3 Publication

The Code of Ethics is published on the institutional websites for EDP's various companies and made available in an interactive digital version within their internal networks.

EDP's Code of Ethics is published in Portuguese, English and Spanish. In the event that discrepancies emerge in interpreting between this text in Portuguese and the respective translation into another language, the meaning of the original text written in Portuguese shall prevail.

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# Message from the CEO

At EDP, integrity and transparency are paramount values and the foundation upon which we build our credibility before stakeholders. The concepts behind ethics and integrity act as a compass that guides every decision we make.

These values, which permeate every sphere of the Company's activities, allow us to ensure that EDP remains aligned with the philosophy behind ESG and inspires our employees. Ethics allow EDP to build relationships with our partners within the value chain that are built on trust, gaining the trust of investors and shareholders, as well as the respect of society.

EDP's Code of Ethics is the official instrument guiding the company's commitment to ethics, and we expect our employees and those acting on behalf of EDP to consistently adhere to its precepts. This is one of the most important documents at EDP, one that allows us to ensure that our stakeholders are able to rely on an increasingly consistent and dependable Company.



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CEO EDP Brasil  
João Marques da Cruz

# Our identity...

EDP is a leader in the global energy sector and focuses on generating value for its stakeholders.

The Company's purpose, *"Our energy and heart drive a better tomorrow"*, seeks to align its 13,000 employees with regards to what constitutes responsible leadership.

Under EDP's purpose, **energy** represents the Company's strength and history, and the incentives that it provides for continuous achievement of goals; **heart** reflects the key role that the Company's employees in fulfilling the commitments that it has made to clients, partners and communities; **drive** reflects EDP's ambition and the way its leadership allows the Company to truly make things happen; and a **better tomorrow** is what drives us to come to work each day.

EDP intends to use its *"Changing Tomorrow Now"* strategy to achieve ambitious targets for sustainable growth. Through this strategy, the Company expresses its commitment to excellence in business development, which involves decisive contributions to fair energy transition and the building of a better world for all through significant investments in clean energy over the coming years.



Reputation is one of EDP's key assets. Therefore, EDP strives to carry out its activities in an ethical and responsible manner within the different markets in which the Company is active, acting in accordance with the principles that stem from and form the base of EDP's identity.

# ...and key commitments in terms of ethics

The bold vision of the future to which we aspire – one that is built upon growth, employee involvement, loyalty to our clients and partners – centers on the company’s support for **key values**, its unifying sense of purpose, as well as the implementation of a solid Code of Ethics, a fundamental pillar of **OUR ENERGY!**

EDP’s main **identity traits** and its affirmation of its commitment to ethics therefore creates a company...

# 1

... **that is people-centered**, the “heart” of its strategy, caring for their well-being and promoting a culture of respect and acceptance among all employees, regardless of the respective stage in which they find themselves within the organization; freedom to intervene without fear of retaliation; consistent attention to physical and mental health; promoting the development of knowledge and additional skills – efforts that guarantee that the most appropriate practices are put in place at work in terms of flexibility and offering the right balance between work and free time.

# 2

... that promotes and maintains **relationships** with stakeholders that are **built on trust**, working to consistently improve economic and social results, generating value together with Employees, Shareholders, Clients, Suppliers, Communities, respecting the principles of open market competition, and bringing together social and environmental accountability, knowing that fostering stronger and more serious cooperation will have a positive effect on the Company and in turn society as a whole.

# 3

... that works consistently – and with a strong sense of urgency and anticipation – to lead the profound **transformations** that are taking place **within the energy sector**, committing itself to ambitious decarbonization targets and the implementation of a fair and innovative energy transition built on responsible use of technology.

# 4

... that maintains a strong commitment to **adhering to internal and external policies** and standards, guaranteeing compliance with applicable legislation and regulations across the jurisdictions in which the Company operates and maintaining robust internal control systems aimed at preventing and mitigating potential violations.

# Responsible leadership

Ethics is one of the fundamental pillars of human activity and, as a result, business development. Companies play an essential role in bringing Ethics to life in our day-to-day activities. Leaders, however, regardless of their hierarchical level, have a special mission – they are the ones who build teams, help to develop their skills, and offer guidance and inspiration – a serious responsibility in the context of promoting and disseminating a culture based on ethics.

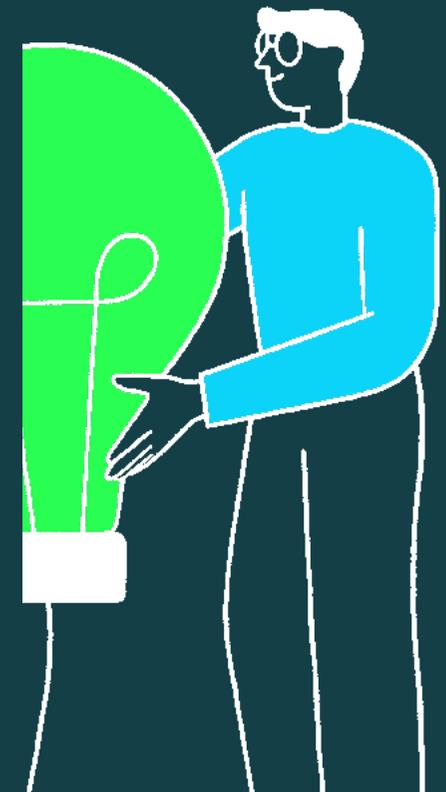
Leaders are responsible for to disseminating EDP's values and purpose in their day-to-day decision making through their indispensable knowledge of the Company's policy for business ethics, as well as standards for behavior that ensure that we all "do the right thing". Leaders offer an example and provide the appropriate signals during the construction of the ideal organizational culture.

The profound social and cultural shifts that society currently faces, pose new challenges for leadership. At EDP, we recognize these changes and seek to implement the best possible management practices in order to better understand the expectations of coming generations in terms of social and environmental responsibility; to be able to create a healthy environment in which people feel comfortable to share their experiences and resist any unethical behaviors that they observe; to be able to listen and understand reported areas of concern, thereby offering psychological security; to truly understand the inherent value of the diversity of our teams; to foster the general physical and mental well-being that allows people to evolve in a positive manner and generate value for the organization, thereby helping to strengthen the Company's culture of ethics.

The challenges posed by the technological revolution – new systems, their potential and associated risks, as well as the demand for new digital skills – and the significant changes that have emerged at work – hybrid work, new forms of contractual relationships, among others – also place an unprecedented demand on leaders.

Companies are increasingly faced with an expectation to develop ethical and responsible businesses and implement effective management practices. It is therefore essential that we have leaders that are open to change at the global level and the various transformations that are already underway, leaders that are humane, that listen and offer advice, that are honest, fair, and transparent, that build and promote culture and do not tolerate violations of ethical principles.

EDP clearly understands these demanding standards for behavior, and we seek to offer individuals support in preparing themselves to become exceptional leaders.



# A Code for all...

EDP's Code of Ethics applies to all of the employees at companies existing within the EDP universe, as well as employees from the EDP Foundation and the EDP Institute, hereinafter also referred to as "EDP". "Employees" refers to the individuals working at EDP, including those holding management positions at any level within the Company's structure.

**We must all read, fully understand and comply with the Code of Ethics in addition to offering formal acceptance of its precepts on an annual basis.**

The employee commitments set forth under this document also apply to attorneys-in-fact, with the necessary adaptations, as well as to agents and suppliers that are in some way authorized to act on EDP's behalf.

Remaining suppliers are expressly required to comply with EDP's Code of Ethics, in accordance with obligations arising from qualification procedures or under established contracts.

Entities in which EDP holds more than 50% of the voting rights, or which it has the right to exert control, must adopt its Code of Ethics. Furthermore, non-controlled companies are also encouraged to incorporate these principles.

This is a slightly adjusted version of the EDP Group Code of Ethics that includes, in addition to the policy defined for business ethics established under this Code, specific mention of EDP Brazil's governance model, certain legal aspects and configurations that arise from such business realities. At EDP Brazil, despite EDP Group's Code of Ethics being the Company's primary reference document, for practical reasons this adjusted version must be followed.

As a vertically integrated global utility, EDP has a significant presence in the global energy landscape and operates in approximately 30 markets through activities carried out by 13,000 employees. The Portuguese version of this Code is considered the main version; however, the Code is also available in English.



# ...one that guides us and guarantees accountability

The Code of Ethics is an “action guide” that reflects EDP’s understanding of the manner in which we must carry out work. It is therefore imperative that the Code be put into practice. Thus, employees that do not comply with the provisions contained in this Code are subject to disciplinary actions under the legal and regulatory terms that are applicable to the respective violations committed. Suppliers to which the Code applies will also be subject, in cases of non-compliance, to measures or sanctions that are contractually established or stem from the evaluation and qualification procedures currently in place at EDP.



EDP’s Code of Ethics does not replace existing Policies, Procedures and internal regulations that are in place for each specific area of EDP’s activity, but rather serves to complement such documentation.

Conversely, the Code does not cover the entirety of the situations that may potentially arise and require decision making in the face of ethical dilemmas. The Code of Ethics does not provide us with all of the

answers, nor could it do so under any imaginable circumstances. It is essential that every member of the company possess common sense, practices discernment, and consistently seek to put EDP’s values into practice. The Code serves as a guide that helps us understand sensitive or less common situations that may arise and reject unacceptable practices, regardless of the manner in which other individuals perceive such circumstances.

When faced with a difficult situation with regards to the manner in which the Company carries out its respective activities, the following steps must be taken:

## Stop and think about

whether the situation in question constitutes a violation of the Code and how this issue can be addressed.

## Reflect on

whether the approach identified is consistent with maintaining EDP’s culture of integrity, transparency and trust and the potential consequences of such an approach.

## Ask questions and seek assistance

from within EDP’s hierarchical structure or other individuals responsible for the respective areas. If necessary, consult the Compliance department or report the violation using the Corporate Speak Up Channel. The expression “We give others a voice” refers to the means of communication that exist under the Code of Ethics.

# We give others a voice

At EDP, we believe that speaking openly about our concerns with regards to the manner in which we behave at work is essential to creating a healthy, respectful and ethical environment that allows us to commit to implementing best practices and professional development. These commitments require that we achieve the level of excellence to which EDP aspires. This openness in addressing concerns and/or complaints must be adopted together with stakeholders for the purpose of maintaining a relationship that is based on the strengthening of a transparent, integral, and constructive culture.



**Frank and transparent conversation** between parties contributes to increasing trust and psychological security among individuals and teams. The effects of such conversations on the results obtained in the workplace are therefore fundamental for all employees. In the event that conversation is not enough, and EDP’s employees and collaborators experience or observe behaviors that violate our Code of Ethics, the occurrences in question must be reported using the Corporate Speak Up Channel. **Reporting practices** must be comprehensive in nature and center upon the principle of good faith. A report made in bad faith and/or reports of a libelous nature will not be accepted and may constitute a disciplinary infraction under the terms of applicable legal provisions and all relevant legal effects.

It is preferable that any concerns, information requests or complaints involving employees be resolved through means of the respective hierarchical structure. Leaders have a special responsibility to actively listen to and address these concerns. This is a path that must be followed since it reinforces trust between all members of the company. However, when this is not possible, employees – like other stakeholders – may use the [Corporate Speak Up Channel](#) directly.

Reporting is carried out through this channel through means of a **robust, effective and efficient management process** that is supported by an independent governance model. The confidentiality of whistleblowers is completely guaranteed under such procedures. All communication may also be provided anonymously.

The obligation for “**non-retaliation**” is an essential part of the process involved in reporting potential violations of EDP’s Code of Ethics. EDP therefore prohibits any form of obvious or subtle reprisal made against individuals reporting a concern. EDP considers retaliation be a violation of its Code of Ethics, and those committing such an act may be subject to disciplinary measures. Retaliation against an employee reporting a potentially unethical situation impairs the trust and sense of reliability that is placed in the company. Conversely, such an act may also expose EDP to serious legal risks.

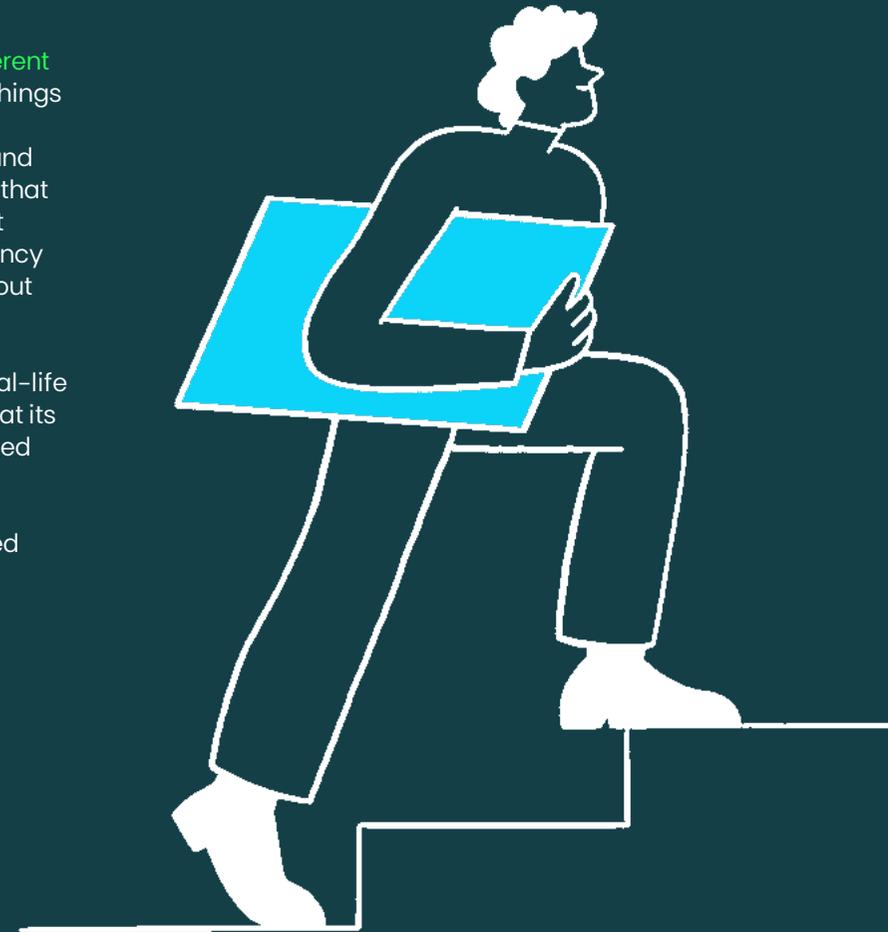
**At EDP, we believe that the freedom to report unethical conduct, which based on the essential principle of good faith, is a fundamental component of an open organizational culture in which employees receive support in doing what is right. A healthy work environment can only be built with the support and involvement of all members of the company.**

# Let's make the way for OUR ENERGY!

EDP's Code of Ethics is inspired by its **Purpose** and built upon its established identity.

We characterize our identity through four different "traits" that guide the manner in which we do things at the Company. Each of these "traits" include themes that are of extreme relevance to EDP and touch upon the reasoning behind each choice that we must make and the behaviors that we must follow, or not follow, in order to ensure consistency with regards to actions that are taken throughout the organization.

We illustrate some of these behaviors using real-life situations taking place at the Company since, at its core, Ethics is really about actions. The indicated behaviors and examples are obviously not exhaustive and merely represent the essence of how we would like to work and be recognized by our stakeholders.





## A People-Centered Company

- 1.1 Employee Well-being
- 1.2 Health and Safety
- 1.3 Acting as Representatives of the Company
- 1.4 Diversity, Equity and Inclusion
- 1.5 Combating Harassment
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# 1.1 Employee Well-being

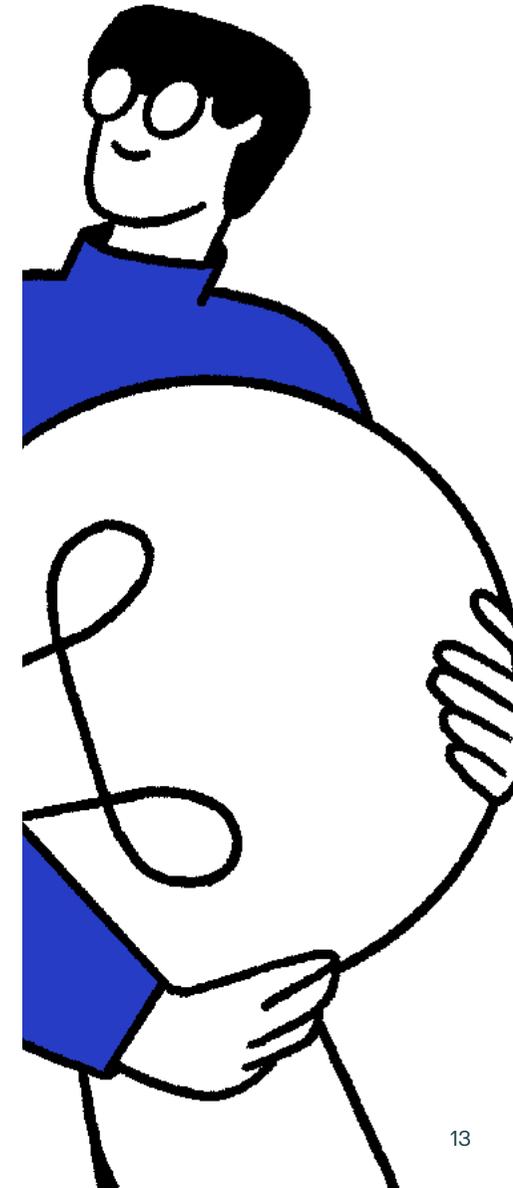
A commitment to the well-being of employees is a fundamental part of operations at EDP. This commitment is formalized through management policies that aim to provide high levels of satisfaction and a sense of professional fulfillment, guaranteeing fair remuneration and a safe and healthy work environment at all stages of an employee's journey at EDP.

Employees are "at the heart" of the Company's strategy and their well-being is seen as a priority that is promoted through concrete objectives expressed in the "Global Well-being Strategy" and includes the following dimensions: physical, emotional, social, professional and financial.

Therefore, in addition to the strict compliance with labor legislation applicable to the various locations at which EDP operates and comprehensive protection of employees' privacy, the Company seeks to maintain an excellent social climate through the implementation of policies and practices such as

the continuous skills development, the promotion of mobility, the inclusion of flexibility, placing value in hybrid work models, incentives aimed at establishing a balance between professional and personal life, the promotion of volunteering opportunities and athletics and leisure activities, and the creation and maintenance of adequate work spaces.

Given that well-being is an indispensable of harmonious relationships within an organization, EDP ensures that its policies and practices involve everyone, without exception, so that each individual feels as though they are part of the whole that is their company. It is also important to keep in mind that we are each responsible for finding ways to live out our values at work and develop solid relationships and a healthy professional environment. Leaders in particular have a special duty to create an environment in which people can develop.



We must

01. Recognize and truly live out EDP's Purpose of EDP, developing an awareness of the importance of our individual contributions to the whole and working together to build an environment of trust, accountability and mutual respect.

02. Actively seek out professional development that contributes to the continuous updating of essential skills, taking advantage of the opportunities provided by EDP.

03. Promote a workplace in which everyone is able to speak out when it is believed that something is not right without fear of any form of retaliation, thereby contributing to a transparent and reliable organization.



04. Invest in the balance between work and personal life, recognizing the importance of individual well-being in fostering a healthy and balanced work experience, taking advantage of new models for flexible work as well as the other opportunities for achieving this balance at EDP.

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

We must not

01. Tolerate any behavior, even subtle ones, that may harm our sense of well-being in the workplace.

02. Violate employees' privacy.

03. Allow acts to be committed that do not respect our rights and diversity and that constitute prejudice or unjustified discrimination.

04. As a leader, prevent, in an unsubstantiated manner, mobility processes, participation in training and volunteering at EDP.

05. Neglect to care for and communicate with each of member of the team as well as offer equity in the distribution of work, particularly under the hybrid or remote work model.

06. Ignore signs of struggle, stress or exhaustion on the part of employees.



Examples

Question



My managers are sometimes quite intimidating. I know they really make an effort to ensure that we consistently deliver quality work, but sometimes the pressure is too much. Is there anything I can do about it?

Answer

Managers are expected to challenge and lead teams to deliver the high-performance levels that are characteristic of EDP. This may mean that there are moments of tension. However, leadership is also expected to treat everyone with respect and exercise empathy. If you feel you are not being treated with respect, try talking to a member of your management team. If the situation is not resolved, you can enter in contact with the respective human resource management bodies or, as a last resort, use the Corporate Speak Up Channel. We are only able to build a healthy work environment with the support and involvement of all members of the company.

Question



A volunteer activity has been announced that I would very much like to be a part of; however, we are close to the end of the year and with the intense volume at work, my participation in these activities may not be well-regarded by my management and my colleagues. What should I do?

Answer

Professional obligations must always be properly prioritized. On the other hand, EDP actively supports its employees in volunteering in the community. Therefore, you should talk to your superior within the Company's hierarchical structure and together seek to resolve the situation, which must never negatively impact professional responsibilities.

Question



I am working on a project with employees from different geographical locations, and lately the project manager has systematically neglected to schedule meetings at times that are suitable for each team, which has resulted in a certain level of unpleasantness among team members. It is my understanding that the teams have been sacrificing their schedules and personal lives in order to ensure that they do not miss meetings. I know the project is very important to EDP, but I don't think this is a fair move. What should I do?

Answer

It is expected that those who are appointed to manage a project deliver on the respective tasks in manner that is timely and offers a high level of quality. However, the well-being of members of the project teams cannot be neglected, as this is also one of the manager's key responsibilities. Therefore, you should talk to them and make them aware of the situation. If the situation is not resolved, you can report the situation through the Corporate Speak Up Channel.

Question



Due to the fact that I am taking care of my parents, I decided to opt for the hybrid work model once the pandemic started. Unlike most colleagues on my team, this involves working more online than in-person. I am, however, concerned about future career opportunities at EDP. Who should I go to for advice?

Answer

EDP supports flexibility at work, both in terms of space and scheduling and is a family-conscious Company. Your choice to work in a hybrid format must not negatively affect your professional development. You should approach your immediate managers or to the People and ESG department for your region with your concerns on this subject.

Find out...



## Related information

### EDP Group

[We put well-being first](#)

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

[Volunteering Policy](#)

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

Dedicated internal department

[Well-being & Flexibility](#)

[Mobility](#)

[Volunteering](#)

## 1.2 Health and Safety

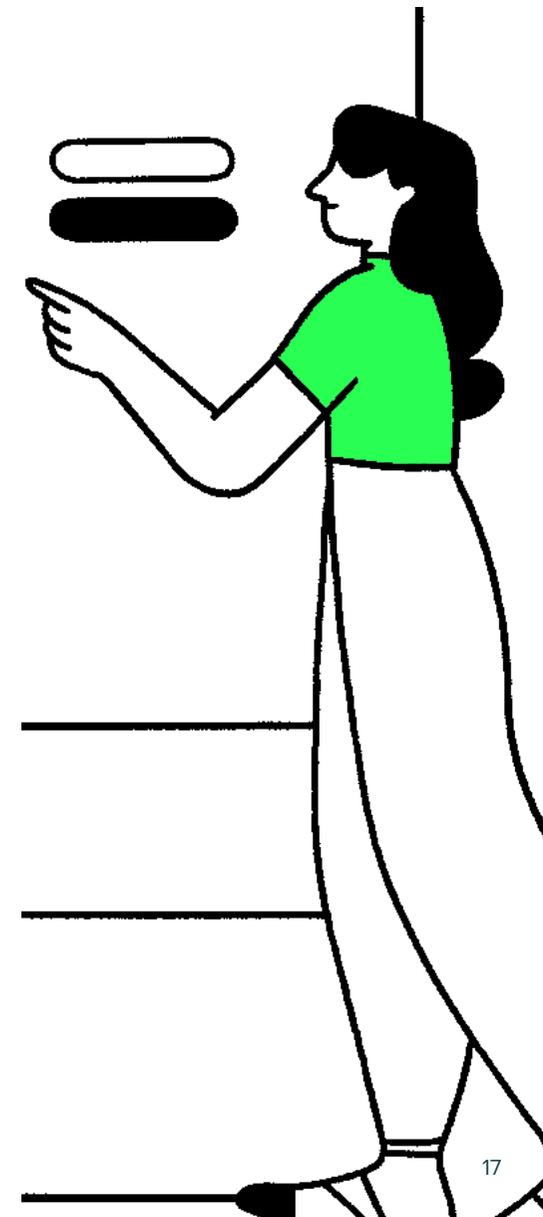
The Health and Safety of all employees and suppliers are of fundamental importance to EDP.

With regard to Safety, the Company seeks to **achieve “zero accident”** targets and puts the well-being of its people before any operational needs. There are no situations or urgency in services that justify endangering someone’s life, physical integrity or safety.

With a base in the reinforcement of a vertical culture for prevention and safety, EDP offers employees training and information on the risks inherent to the activities they perform and seeks to protect facilities and equipment by adopting the best available techniques and monitoring and updating of work procedures. **The importance that EDP places in Safety extends to the supply chain**, particularly service providers acting on behalf of EDP or working on its premises and goes beyond mere compliance with legal requirements. These practices are implemented in all companies and in all regions in which EDP operates.

And, in the wake of the COVID-19 pandemic, EDP reinforced its attention on employee health by designing a “Global Well-being Strategy” aimed at creating or strengthening the conditions required for each employee to benefit from a **complete state of physical, mental and social well-being** through means of various initiatives. Healthy life practices are therefore encouraged and supported in all contexts, and the Company continues to provide its employees with supplementary health care and protection.

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



We must

01. Ensure that all individuals, including suppliers, particularly those acting on behalf of the Company, comply with safety and health standards and practices in accordance with existing legislation and regulations.

02. Ensure the continuous strengthening of a safe, healthy and productive working environment by raising awareness, offering training and sharing best practices.

03. Monitor and assess risks and occurrences.

04. Report any instances of non-compliance that are uncovered, as well as recording incidents, whether they are accidents or near misses.

05. Take permanent precautions in order to avoid putting ourselves or third parties at risk, regardless of the specific circumstances involved.

06. Develop an awareness of applicable procedures in case of emergency.

07. Exercise the right to refuse to work if current conditions are unsafe for carrying out the respective activity.

08. Look for signs of physical or mental exhaustion, persistent tiredness, difficulty concentrating, poor memory, insomnia or excessive sleep, sadness, anxiety or irritability, among others, both within ourselves and others.

09. Make sure to truly disconnect from work during designated free time.



We must not

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

02. Neglect to strictly comply with the Company's safety and health objectives.

03. Neglect the active and continuous promotion of physical and mental health, refraining from taking advantage of the benefits and initiatives offered by the Company with regards to physical, mental and social well-being.



# Examples

## Question



## Answer

I occasionally notice that, at one of EDP's projects, some of the stipulated procedures are not being followed. The works are not directly related to my area. Should I report this?

Maintaining compliance with applicable procedures (particularly those related to legal obligations and workplace health and safety), as well as the Company's image, is of everyone's concern, regardless of the scope of their activities. You should promptly report this issue using one of the appropriate channels. In case of an imminent and serious risk, the work must be immediately stopped by the individual observing the noncompliance in question. Each EDP employee has the duty and autonomy to interrupt any work carried out by their teams or service providers whenever inadequate conditions exist with regards to safety.

## Question



## Answer

I have noticed that a colleague has been increasingly apathetic and having a hard time concentrating, which has negatively affected the work of our team. I've asked this person several times if they're having any personal problems, but they insist that everything is fine. I'm worried. What should I do?

These may be signs, albeit subtle, of depression. Having already spoken with this colleague directly, you should notify your superior within the Company's hierarchical structure in order for them to be aware of these signs and act accordingly. Your colleague may be referred to the support services or psychological/social monitoring provided by the company.

# Find out...



## Related information

### EDP Group

[Health and Safety Policy](#)

[EDP's Supplier Code of Conduct](#)

[Internal area dedicated to Prevention and Safety](#)

### EDP Brazil

[Management Procedure for Workplace Health and Safety at Contracted Companies](#)

[Management Procedure for Safety at Service Providers](#)

[Governance Procedure for Safety](#)

[Rules that save lives](#)

# 1.3

## Acting as Representatives of the Company

Our performance and the way in which we communicate as employees, attorney-in-facts, agents or service providers with powers to act **on behalf of EDP** in both formal and informal contexts can affect EDP's image and reputation.

It is therefore essential that we are aware of the impact of everything that we do and say, whether in public or in physical or virtual spaces, particularly when the Company's name or operations. At the end of the day, we are all ambassadors of EDP.

New technologies are introducing radical changes to the way in which we communicate on both a professional and individual level.

Social networks, for example, as digital public spaces, can serve to develop a sense of belonging and generate collective knowledge. However, acting and interacting within online communities, sharing information, ideas, interests, personal messages and other content makes it difficult to separate our personal image from that of the Company. We are therefore each obligated to know how to strike a clear **balance between personal opinion and the Company's position** on a particular matter.

We also each receive a call **represent EDP with pride, placing value in its principles and commitments with regards to Ethics and Sustainability.**



We must

01. As a representative of EDP, act within established limits, ensuring consistency, coherence and transparency across all internal and external communication channels.

02. Predict the impact of the statements that we make outside EDP, always taking into account the reach that information can have in the media and on social networks.

03. Distinguish between our personal opinion and the Company's position.



04. Ensure that any communication regarding EDP has been adequately prepared and authorized by management.

05. Inform our superiors within the Company's hierarchical structure about derogatory comments or opinions that are shared in the media and on social networks.

We must not

01. Act in a manner that exceeds our designated responsibilities while discharging duties at EDP's service or on its behalf.

02. Speak in public on EDP's, unless duly authorized to do so by management.

03. React to negative or derogatory content regarding EDP unless we have been properly informed and authorized to do so.

04. Share internal information on social networks.

05. Use EDP resources, including email or personalized cards, to express personal opinions or promote private business activities.

06. Make reference to colleagues, clients, partners, service providers or other related parties without their approval.

07. Use EDP's brand for private purposes under any circumstances.

08. Involve EDP in our personal activities.



Examples

Question



In a conversation between friends with regards to current topics in the media, issues that call EDP's reputation into question were mentioned. Should I intervene in such a conversation?

Answer

You must offer the Company's position on this matter, if you possess the necessary knowledge to do so. If you do not have enough information, you should refrain from commenting and state that EDP is a company that carries out acts as a whole. Additionally, you must notify others that EDP has its own channels available for disclosing information as well as reporting situations that are considered inappropriate.

Question



I found information that includes derogatory statements made against EDP on social media. What is the best course of action to take in this case?

Answer

You must immediately inform your superiors at the Company.

Question



I am attending an important international conference within the industry and during dinner we talked a bit about each of our companies. The next day, I realized that one of the people at the dinner was a journalist. Even though I didn't reveal anything confidential, nothing that I said was meant to be published in the papers. Is there something that I am supposed to do now?

Answer

When you are at a public event, it is important to always keep in mind that everything you do and say both professionally and personally may be shared in the media or on social networks. Contact your superior within EDP's hierarchical structure. They will in turn advise you with regards to the actions that should be taken.

Question



I have a friend who's running for political office. Can I help them with their campaign?

Answer

Yes. You are able to make a personal decision to volunteer to offer support in such cases. However, you must refrain from using EDP's resources such as telephones, email addresses, materials, the Company's name or your respective position, even during working hours, for the purposes of supporting the campaign.

Find out...



## Related information

### EDP Group

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

Dedicated internal department

[EDP on social networks](#)

[EDP's Storytellers](#)

### EDP Brazil

[Information Security Standard](#)

[Standards for Communication within management systems](#)

[Compliance Standards](#)

[Brand and Communication Standards](#)

[Standards for Interaction with Public Officials](#)

# 1.4 Diversity, Equity and Inclusion

EDP has a global presence and brings together a diverse group of people from around the world. We value and promote **diversity not only as a means of generating value and innovation**, but also as a form of including others. Equity allows the Company to expand across new horizons and develop an understanding of the way in which others overcome obstacles.

We recognize that **the sum of our differences allows us to go further**, to learn more about other points of view and ways of seeing the world, integrate different dimensions to a particular subject, and consciously include others through means of profiles, paths and experiences that add value and allow us to be better at what we do.

EDP actively seeks to avoid any form of bias and takes steps to expand a culture of inclusion in which everyone feels welcome.

**The Company promotes diversity and inclusion, guaranteeing equal opportunities as an employer**, and we encourage our suppliers to implement the same practices.



We must

01. Promote mutual respect and equal opportunities in the face of diversity, offering an inclusive work environment that is free of prejudice and discrimination.

02. Foster an environment in which we all feel respected and safe in being who we truly are.

03. Encourage the inclusion of all forms of human diversity.



04. Place value in and protect what makes us unique in order to ensure fair and equitable opportunities for all.

05. Make sure that suppliers acting on EDP's behalf are aware of the commitments that we have made in this regard.

We must not

01. Implement or base any decisions on discriminatory factors, ancestry, age, sexual orientation, gender identity, marital status, family situation, economic situation, education, background or social conditions, genetic heritage, reduced work capacity, disability, chronic disease, nationality, ethnicity, territory of origin, language, religion, political or ideological convictions, union membership or that are based on function, activity or professional category.

02. Practice discrimination during the recruitment process or at any other time during the relationship maintained between employees and the Company, including training, development and professional recognition and internal and inter-company mobility, among others.



Examples

Question



A colleague with a motor impairment was recently integrated into my team. I of course understand the difficulties that they face, but the fact remains that their productivity is lower and at the end of the day this is reflected in the team's results. What should I do?

Answer

You should talk to your immediate superior and explain the concerns that you are having. There is room for everyone at EDP, but if your colleague has been assigned targets or functions that they, due to their physical condition, are not able to fulfill, this will not be positive for either them or your team. Together you will be able to assess the situation and, if necessary, find a more appropriate alternative solution.

Question



I am about to start a period of maternity leave and I am concerned about what will happen when I return, particularly with regards to future opportunities for professional development. Who should I go to for advice?

Answer

EDP supports healthy family relationships and therefore provides employees with assistance subsequent to periods of maternity and paternity leave, making sure that they are able to resume the activities for which they were hired. Any questions or concerns on this subject may be addressed by your immediate superior or the human resources management body for the respective area.

Question



While preparing internal recruitment processes for a new project, I suggested that two colleagues with immense experience and crucial skills in the area (which none of us have) be included. However, I was told that they would retire before the project was complete and it would therefore not be worth including them. I stated that, on the contrary, this would be an excellent opportunity to place value in their experience and ensure that the company is able to retain the knowledge that they have acquired before they retire. Does it make sense for me to insist on the proposed inclusion of these two employees?

Answer

Your proposal makes perfect sense, and this is something you must indeed insist on. In fact, this is a good measure for inclusion that not only places value in the knowledge that employees have accumulated at the company and allowing it to be applied in a new project, but will certainly make them feel that they "are part" of EDP, which is very important to their sense of well-being. Age does not reflect a person's true capacity, whether physical or intellectual. Today we are all generally leading healthier and longer lives and are able to remain active.

Question



I constantly hear that diversity is important for the EDP Group. Does this mean that I should prioritize the hiring or promotion of ethnic minorities, persons with disabilities or other groups that often face discrimination?

Answer

No. This is not what is expected of you. At EDP, we hire people based on skills and experience and therefore must select or promote people according to these criteria in a manner that is free of prejudice or discrimination.

Find out...



## Related information

### **EDP Group**

[Diversity, equity and inclusion](#)

[Internal area dedicated to Diversity and Inclusion](#)

### **EDP Brazil**

[Human Development Policy](#)

[Standard for Human Rights](#)

[Brand and Communication Standards](#)

[Compliance Standards](#)

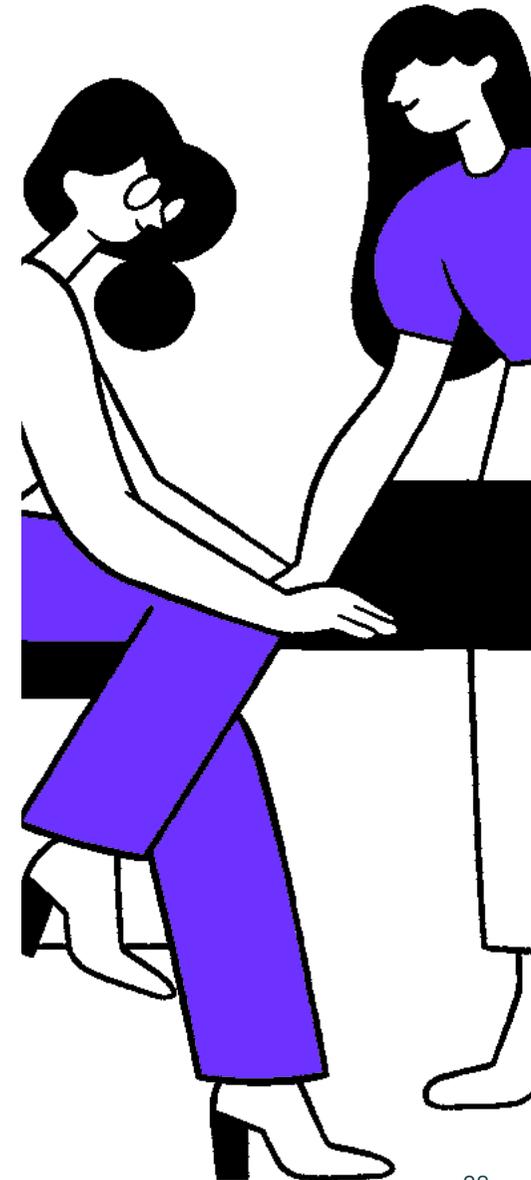
# 1.5 Combating Harassment

EDP seeks to promote a **culture that is free from any and all types of harassment**, which is understood to include unwanted behavior that is based on discriminatory factors or of a moral or sexual nature carried out in a verbal, non-verbal or physical manner, which has the design or effect of disturbing or embarrassing a person, thereby having a negative effect on their dignity or creating an intimidating, hostile, degrading, or unstable environment.

Harassment, including of a sexual nature, can occur within any segment of society, context or place of work, affecting individuals regardless of their ancestry, age, gender identity, sexual orientation, marital status, family situation, economic situation, education, origin or social condition, genetic heritage, reduced work capacity, disability, chronic disease, nationality, ethnicity, territory of origin, language, religion, political or ideological convictions, union membership or that are based on function, activity or professional category.

**Harassment carried out in a professional context violates the victims' labor rights**, which may negatively affect their contribution as an individual and worker, negatively affecting their self-esteem, physical and psychological health, life activities and family relationships.

In addition to the legal obligations to which EDP is subject, **all workers are responsible for preventing, confronting, and reporting behaviors that may constitute harassment.** The duties and/or principles provided for under specific legislation and internal regulations also apply to attorneys-in-fact, agents and suppliers.



We must

01. Refrain from behavior that is likely to constitute harassment at work.

02. Prevent and combat harassment behaviors at work.

03. Report situations involving harassment at work of which we are a victim or that we witness through means of existing channels.

04. Participate in regular mandatory training sessions on preventing and combating harassment.



We must not

01. Tolerate any form of harassment, including: the systematic devaluing of the work of colleagues or employees; promoting the social isolation of colleagues or employees; consistent ridicule, whether directly or indirectly, of physical or psychological characteristics of colleagues or employees; establishing goals and objectives that are impossible to achieve or unenforceable deadlines; assigning functions that are not appropriate for employees' professional category; unjustifiably refraining from assigning any functions to employees; appropriating ideas, proposals, projects or the work of colleagues or employees in an undue manner.

02. Tolerate any form of sexual harassment, such as: repeated suggestive observations or comments about the sexual appearance or orientation of colleagues; phone calls and the sending of unwanted messages and sexual content; sending animations, drawings, photographs or images that contain sexual content; intentionally promoting unnecessary and unsolicited physical contact or approach; rendering hiring, promotions or any other employment benefits conditional upon unwanted activity of a sexual nature.



Examples

Question



A colleague is constantly receiving comments from other colleagues with regards to their clothing and other physical attributes, which makes them visibly uncomfortable. Does sexual harassment necessarily imply physical contact or unwanted touching?

Answer

No. Sexual harassment can also be verbal in nature. Words and gestures can be as offensive as acts or physical contact. Inappropriate stories and comments can be considered sexual harassment if they have the purpose or effect of disturbing or embarrassing the person, thereby negatively affecting their dignity or creating an intimidating, hostile, degrading, or unstable environment.

Question



I am often the subject of discriminatory and sexist remarks made by a colleague, which of course makes me very uncomfortable. What should I do?

Answer

First of all, you should talk to your colleague and inform of the negative effect that these comments are having on you. If he continues to behave this way, you can talk to your immediate superior and inform them of the situation. If there is still no change in his behavior, you should report it using the appropriate channels.

Question



A colleague told me that he was harassed by another colleague. I told him to file a report, but I know he didn't. Can I report this harassment myself?

Answer

You took the right first step by advising your colleague to report this behavior. If you consider this to truly be a case of bullying, you can report it yourself using the appropriate channels.

Find out...



## Related information

### EDP

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

### EDP Brazil

[Standard for Human Rights](#)

[List of Consequences](#)

[Diversity & Inclusion Program](#)

# 1.6 Human Rights

EDP respects and enforces internationally recognized Human Rights, implementing **policies and management measures that seek to identify, monitor and avoid risks associated with its activities that may negatively affect employees, communities, clients or suppliers.**

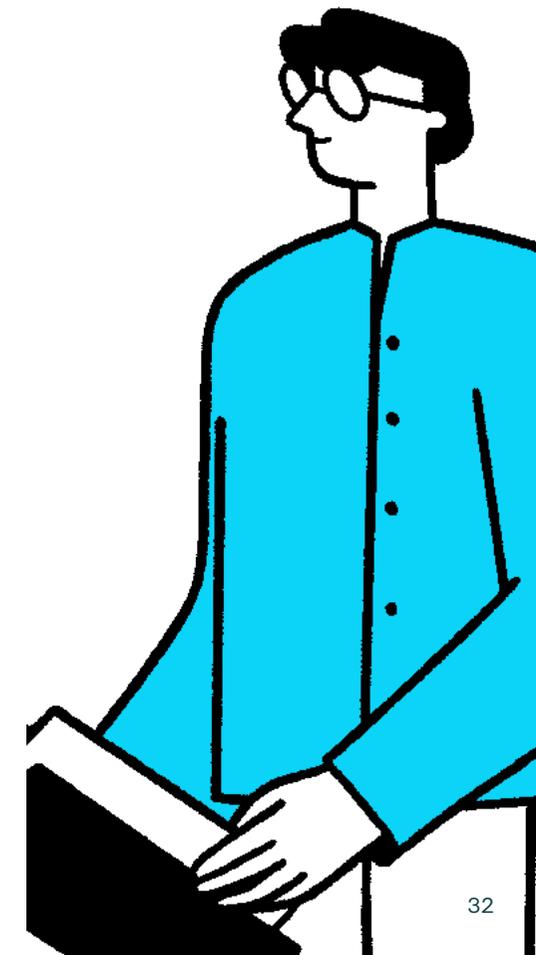
EDP's business activities are guided by instruments published by the United Nations, particularly the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and specific guidelines for the protection of vulnerable individuals and groups that are aimed at eliminating race- and gender-based discrimination, protecting the rights of children and migrants, persons with disabilities and Indigenous communities. The Company also adheres to the Global Compact and seeks to implement the body's Guiding Principles on Business and Human Rights.

Within the framework of the instruments of the International Labor Organization, EDP has implemented the Tripartite declaration of principles concerning multinational enterprises and social policy, including the Eight

Fundamental Principles and Rights at Work, which aim to guarantee Freedom of Association and the right to Collective Bargaining, eliminate Forced or Compulsory Labor, effectively abolish Child Labor, eliminate discrimination in Employment and Professional Activities, respect standards regarding the Workday, preserve Workplace Health and Safety, guarantee payment of a minimum wage, and preserve the specific rights of Indigenous peoples.

EDP's commitments apply to all decisions made with regards to current operations and investment projects, its relationship with suppliers and in the projects, it develops as part of a partnership. Through its Human and Labor Rights Policy, EDP defines the organization of internal processes and assigns responsibilities in order to ensure the application of due diligence processes, mechanisms for active listening and reporting, the obligations regarding reparation, reporting, communication and training and the extending of such commitments through the Company's business relationships.

**EDP aims to establish itself as an industry reference in the protection and respect for Human Rights and has implemented a zero-tolerance policy for violations in this area.**



We must

01. Respect and comply with the legal and regulatory standards regarding Human Rights in force in the jurisdictions in which the EDP Group is active in accordance with the principle of most stringent requirement.

02. Ensure that the commitments voluntarily assumed within the entirety of areas in which EDP carries out interventions are fulfilled, regardless of the level of requirement under national and local legislation, guaranteeing the human and labor rights defined internationally by the United Nations and the International Labor Organization.



03. Ensure compliance with the commitments assumed under EDP's "Human and Labor Rights Policy", maintaining a Human and Labor Rights Monitoring Program that identifies risks and acts avoid, mitigate or repair any negative impacts arising from the Company's business and activities.

We must not

01. Participate or consent, whether actively or passively or due to an act or omission, in practices that may constitute a violation of Human Rights and report such occurrences.

02. Accept or collude with any violations of Human and Labor Rights on the part of third parties that provide us with products or services, even when such violations are subtle or less obvious.

03. Make use of child, juvenile or forced labor, or agree to such practices on the part of third parties providing us with products or services, whether directly or indirectly.



Examples

Question



Answer

Someone recently told me that one of our service providers is currently being investigated for the alleged use of forced labor. During audits that were carried out there were never any reasons for concern. Should I ignore these rumors?

No. You must report the situation in order for management to consider opening an investigation process under which information may be requested from the service provider and additional auditing carried out to eliminate any suspicion.

Question



Answer

I received an invitation to be part of one of EDP's employee committees. However, I fear that participating on the committee may somehow be damaging because I am not sure that this activity is well-regarded among my peers and immediate supervisors. Should I accept the invitation to join the committee?

Yes. You may accept the invitation if it is something you are interested in. EDP supports freedom of expression and association and recognizes that these types of structures serve the interests of all employees by allowing their concerns to be brought before decision-makers. The activities of these committees are therefore commendable and of interest to everyone.

Find out...



Related information

**EDP Group**

[Empowering our communities](#)

[Human and Labor Rights Policy](#)

[Workplace Health and Safety Policy](#)

[Sustainable Procurement Policy](#)

[EDP's Supplier Code of Conduct](#)

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

**EDP Brazil**

[Standard for Human Rights](#)

[Compliance Standards](#)

[Human Development Policy](#)



## Relationships Built on Trust

- 2.1 Shareholder Relations
- 2.2 Client Relations
- 2.3 Supplier Relations
- 2.4 Relationship with Communities
- 2.5 Relationship with Competitors

## 2.1 Shareholder Relations

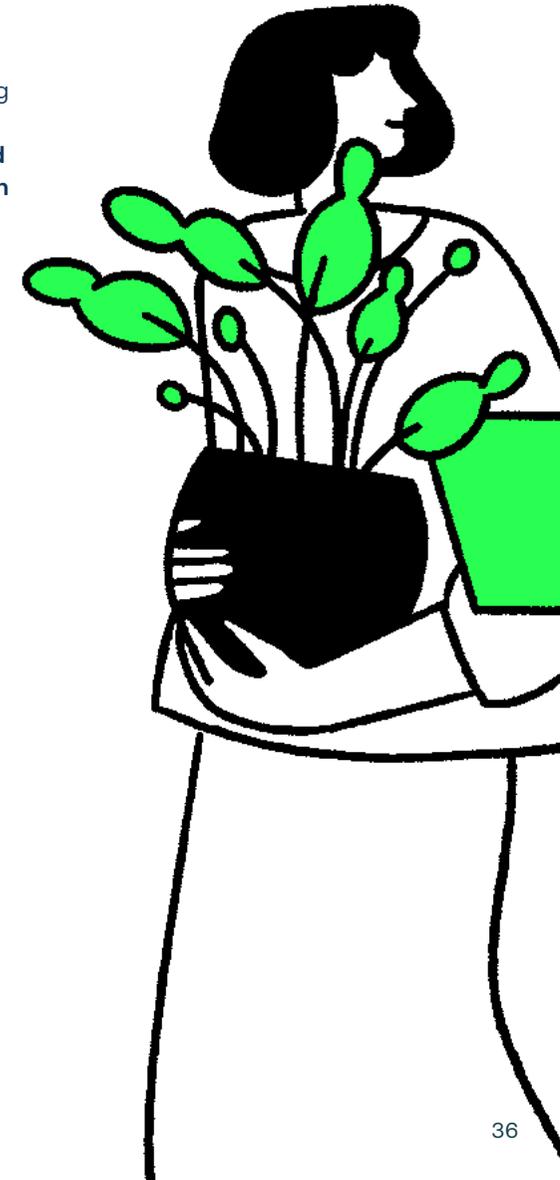
EDP is **committed to generating value** for its shareholders.

“Shareholder value” is supported by strategic decisions that influence the sustainability of the Company’s various business activities, as well as a high degree of excellence in execution and the delivery of solid results in line with existing expectations.

The confidence of shareholders is essential to investment in the Company’s development and is therefore an important element in its central decision-making including forecasts for mass production and use of renewable energies, together with a robust sustainability policy that includes actively contributing to several international commitments regarding human rights, labor, the environment and combating corruption.

The focus on “being 100% green by 2030” is an emerging challenge that the Company is once again embracing in advance, one that will allow it to continue to **carry out sustainable and distinctive business activities within the energy sector**.

Within complex and demanding contexts involving factors such as regulations, government policies, the development of markets and economies, among others, that have a pronounced effect on the Company’s performance, EDP is honoring its commitments to this important stakeholder through means of **decisive actions that are based on integrity and transparency**.



We must

01. Inform the market in a transparent manner of the Company's performance, taking the legal obligations and needs of the interested parties into account and including qualitative and quantitative elements identifying economic, financial, social, environmental and reputational risks in the information provided. Such information must be provided in a comprehensive and clear manner that ensures a high degree of quality.

02. Offer notice on the marketplace of any occurrence in relation to the Company that, upon being disclosed, is likely to affect its respective economic, environmental or social situation.

03. Establish policies and procedures that ensure that EDP's interests are separated from those of shareholders.



04. Respect the principle of equal treatment of shareholders and remaining stakeholders, making the necessary information available in a timely and appropriate, truthful, transparent and rigorous manner.

05. Include the risk of poor ethical practices in the overall management of business risk, identifying the respective warning signs.

06. Develop systematic knowledge of the expected economic performance for the areas in which EDP is active, seeking to actively contribute to achieving established objectives.

We must not

01. Under any circumstances commit acts that jeopardize EDP's reputation, acts related to financial matters, corruption and bribery, conflicts of interest and the use of information and assets belonging to EDP.

02. Fail to challenge the practices that have been adopted within a constructive context once they have been proven to be of critical importance in promoting efficiency.



Examples

Question



Answer

I was recently asked to analyze a potential future investment on the part of EDP in a new region from the perspective of my department. The following day, I was notified by a colleague that I would have to offer a response that same day since a decision was about to be made at the level of the Investment Committee. This urgency stemmed from the fact that the project presented an above-average rate of profitability. Should I deliberately make a shortcut through required procedures, skipping certain analyses, in order to be able to respond in a timely manner?

Any new investment options must be carefully considered. We must always make sure that we analyze and take potential risks into consideration when making decisions. If you cannot respond within the established deadline, be sure to provide the information and analysis that you have available, notifying those involved, in a transparent manner, that it was not possible to complete the analysis.

Question



Answer

During an analysis of a potential EDP partner for a new business area, my team's study took into account several criteria related to risks, finances and profitability. Should I also make sure that the ethical characteristics and integrity of the future partner management team be carried out if business moves forward?

Yes. In fact, EDP already offers this type of analysis as part of its procedures. An analysis of the risks associated with the partnership from the point of view of ethics and integrity is essential. This ensures that any new relationship that is formed with third parties does not compromise EDP's reputation from any point of view. The robustness of Economic Performance is also based on the pillar of Ethics and business integrity.

Find out...



Related information

**EDP Group**

[Investors](#)

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

[Stakeholder Relations Policy](#)

[Sustainability Commitments](#)

[Financial Management Policy](#)

[Corporate Risk Management Policy](#)

**EDP Brazil**

[Standards for the Prevention of Illicit Acts](#)

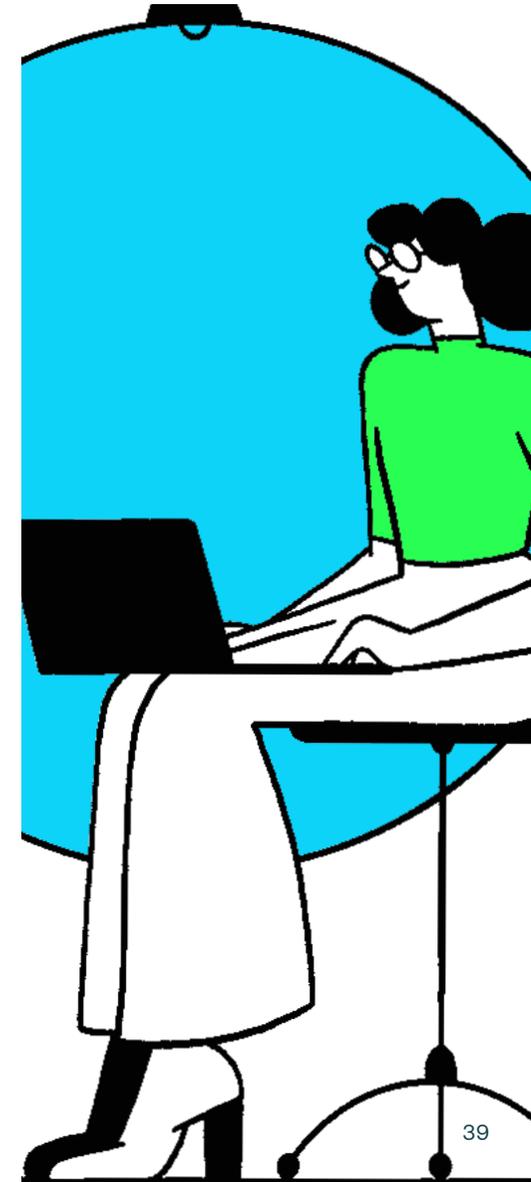
[Compliance Standards](#)

## 2.2 Client Relations

EDP is a client-focused Company. We understand that client expectations are constantly changing and seek to generate solutions that guarantee their satisfaction through means of close relationships and a profound capacity for active listening. **Client satisfaction** translates into greater loyalty and a better relationship with the Company, which contributes to the expansion of business activities and results.

This “client value-based” management logic is based on the assumption that the Company enters into commitments to **establish fair prices, offer clear and reliable communication** with regards to the characteristics and advantages of solutions commercialized, the provision of a high-quality service based on robust operations, among others.

Also taking into account the sector’s demanding regulatory context, EDP has implemented, whenever necessary, mechanisms that ensure the scrupulous fulfillment of its duty to offer **universal public service** to economically vulnerable customers, transparency in information, distinguish between “regulated” and “open” activities, among others.



We must

01. Produce and present honest, transparent commercial proposals that are adapted to the needs of current and potential clients.

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

03. Provide relevant, truthful and accurate information using language that is accessible and adapted to clients' needs, responding to requests, concerns and complaints.

04. Act with correctness, affability and professional pride in all client's relations, respecting their rights, respective sensitive areas, and diversity.



05. Continuously promote improvements in our performance, as well as the quality of the products and services we provide.

06. Create and maintain simple and effective communication channels.

07. Encourage clients and consumers in general to adopt responsible behaviors that have a positive impact on the environment and society.

We must not

01. Neglect protection of our clients' personal data under any circumstances, refraining from using the data collected for purposes other than those for which they were collected or for marketing purposes without the consent of the data holder.

02. Take advantage of our clients' lack of knowledge or vulnerabilities in order to promote new products and services.

03. Include derogatory messages in formal and informal communication with regards to our competitors and their products and services.

04. Use stereotypes that negatively affect human dignity, or others that conflict with existing legislation, in advertising and marketing campaigns.



Examples

Question



While serving a client, I came across an opportunity to sell a product that would contribute to achieving my individual and team goals. However, this particular product may not meet the needs of this specific client. What should I do?

Answer

It is important to place value in the product's characteristics, making things clear to the client and ensuring that they make an informed decision with regards to the best available solution. Using clear and transparent language contributes to reinforcing the Company's reputation.

Question



We are working on a photo campaign and would like to use a photograph that includes a topic that can be considered delicate within the context of society. Can I use this photo?

Answer

It is important to examine whether the photograph in question will cause discomfort or an adverse reaction from any individual. If this is the case, you must refrain from using the photograph in question.

Question



In a market like the one in which EDP operates and in an energy sector that is subject to so many regulations, can I offer services – electricity, gas or others – to potential clients, without making reference to other commercial operators?

Answer

The most appropriate course of action is to inform potential clients that there are several traders operating on the market and, after providing this explanation, present EDP's commercial services in detail, placing value in the distinctive characteristics of the Company's solutions in a manner that respects and adheres to antitrust rules.

Find out...



## Related information

**EDP Group**

[Client Solutions](#)

[Stakeholder Relations Policy](#)

[Integrity Policy](#)

## 2.3 Supplier Relations

EDP, as an extended enterprise, today integrates a series of partners with a diverse background, with whom it works and shares responsibilities and that act and speak on EDP's behalf before clients, citizens and other stakeholders.

Relations with partners must prioritize alignment between their actions and EDP's global strategy for sustainable growth in terms of offering full respect for human rights and a commitment to advancing decarbonization efforts.

**Maintaining trust with these companies is fundamental to EDP's success.** The success of the partnerships we build depends on the way that partners are selected and our commitment to strengthening the relationships.

Our relationships with suppliers are based on criteria for **impartiality, justness, and loyalty**, particularly in terms of respecting their independence and identity.

Under no circumstances does EDP use its potentially dominant market position to gain advantages in its relationship with suppliers.



We must

01. Select suppliers based on EDP's policies and procedures that include specific pre-established criteria – ethical, technical and economic – that are clear and impartial.

02. Ensure that suppliers comply with health and safety standards and practices, environmental regulations, labor and human rights legislation and other applicable laws, performing verification audits whenever such suppliers are classified as critical.

03. Enhance knowledge of the value chain for EDP's critical suppliers and the ethical risks inherent to contracts that are entered into in order to ensure relations are aligned with EDP's values.



04. Analyze the conditions under which equipment and materials purchased from various suppliers fulfill established international standards at their respective origin.

05. Respect the identity of each partner, but require that they fulfill the obligations set forth under this Code when mandated to act on behalf of EDP.

06. Guarantee the confidentiality of suppliers' information and respect their rights, including those pertaining to intellectual property, for example.

07. Implement the necessary preventive measures to ensure that suppliers, regardless of their nature, do not become economically dependent on EDP.

We must not

01. Accept to participate in supplier selection decision-making processes which may generate situations involving a potential conflict of interest.

02. Impose unfair conditions on suppliers or fail to comply with agreed upon payment conditions.

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



Examples

Question



I received a request from a client for the urgent installation of solar panels. An acquaintance has a company that installs them at competitive prices and is able to guarantee that work is completed on schedule.  
Can I contract this person's company without first consulting other competitors?

Answer

This is not the correct procedure and violates the EDP Group's standards. Contracting must only be carried out without advance competition in specific situations in which such a procedure is duly justified and authorized in accordance with the provisions contained in the management authorization. Additionally, the fact that this company is owned by an individual with which you have a preexisting relationship creates a potential conflict of interest that must not be allowed to occur. You must report the situation to your management, offering the entirety of the information that you consider relevant and remove yourself from the decision-making process. The individual that comes to be responsible for the process must assess the effective urgency and whether it is justified to not use a prior competitive procedure, verifying which suppliers are able to fulfill the request on time and contracting the one that presents the best conditions.

Question



I have been contacted by a supplier that wanted to know why I did not select them during a particular competition process. I am part of the team responsible for technical analysis of the proposal.  
Am I allowed to justify my team's decision?

Answer

You can explain to the supplier the reasons that led to their proposal not being selected for contracting purposes, provided that you are authorized to do so.

Question



An employee of a company that wishes to compete for a contract renewal process asked me to provide them with information on the prices that competitors are charging under the previous contract. Being selected for this contract may be decisive for the viability of this company, and they are prepared to lower the price they usually charge in order to secure it.  
Can I provide this information?

Answer

You must not provide this information unless it is a matter of public record. Competitors must not have access to any type of information that offers them a business advantage.

Find out...



## Related information

[Suppliers](#)

[Collaborating with our partners](#)

[Sustainable Supply Chain Management](#)

[Procurement Policy](#)

[Stakeholder Relations Policy](#)

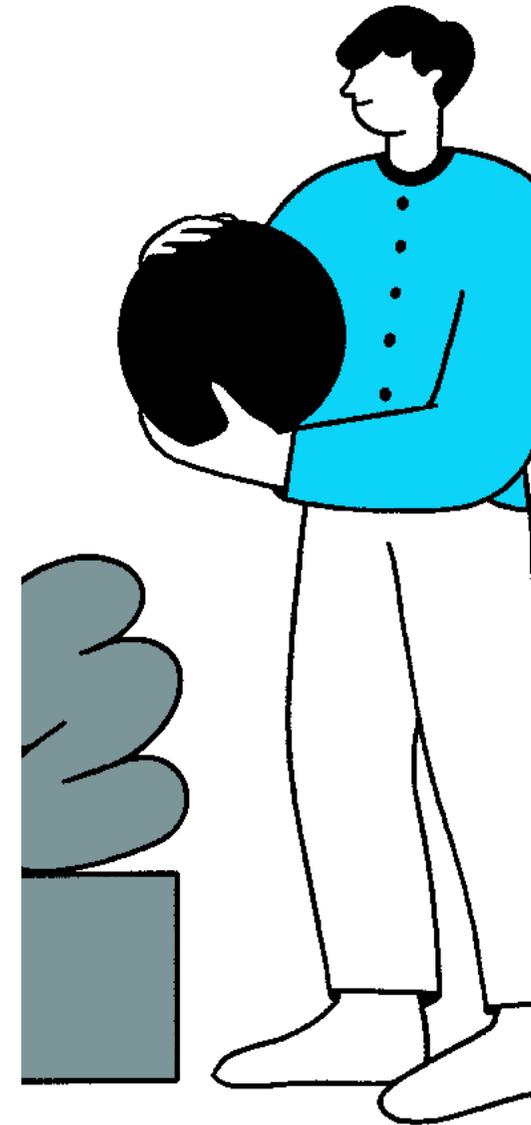
[EDP Supplier Code of Conduct](#)

## 2.4 Relationship with Communities

EDP strives to have a positive impact on society, placing value not only its employees, clients, suppliers and partners, but also the communities in which it operates, respecting issues of a sensitive nature and local culture. Promoting **sustainable development in the regions in which we are present and the communities with which we interact** is one of the pillars on which we build our business strategy, as well as our reputation.

We seek to develop a **culture of business citizenship and engagement with society** through means of cultural initiatives, such as promoting access to cultural events and art and preserving cultural heritage. EDP also supports social initiatives such as those aimed at promoting social inclusion and adopting sustainable ways of life, placing value in inclusion and access to energy. We also promote environmental initiatives, such as protection of natural heritage sites and biodiversity and, most importantly, promoting energy efficiency, renewable energy and decarbonization.

**Understanding, communication, trust, and collaboration** are the guiding commitments behind the active and transparent engagement that EDP continuously seeks out within **local communities**.



We must

01. Maintain an active and close relationship with communities located in the regions in which we operate, establishing regular, open and frank dialogue, and seeking to address their needs. EDP strives to respect the cultural integrity of these areas and contribute to improving the living conditions among local populations.

02. Maintain adequate communication channels and inform citizens of environmental impacts stemming from EDP's infrastructure, as well as the risks and hazards associated with energy, whether resulting from normal use or misuse, or from the operation of facilities and equipment under the Company's responsibility.



03. Promote access to energy among communities that are isolated from electricity grids, as well as energy efficiency and the adoption of increasingly sustainable lifestyles.

04. Recognize the rights of ethnic minorities and Indigenous peoples.

We must not

01. Engage, on behalf of EDP, in social initiatives that do not reflect our commitments and community engagement strategies.

02. Initiate any interventions without first consulting stakeholders to assess potential social impacts and define the necessary mitigation measures.



Examples

Question

I am participating in a fundraising campaign for a non-profit organization in the area in which I live.  
Can I ask colleagues from the company to participate in the campaign?



Answer

You must not request monetary contributions from colleagues in the workplace. As an alternative, you can contact your immediate supervisor in order to include the Company in your efforts to help this institution using the departments that are responsible for donations and sponsorships.

Question

I was asked to help repair electrical installations at the Sports Club in the city in which I live on the the weekend, free of charge. I would like to perform this service, as well as ask some of my colleagues at EDP that have technical expertise in this area to help.  
I believe this would be considered volunteering, but I am not sure if I can do it.



Answer

You must verify whether the work carried out by this institution is aligned with EDP's programs, community relations policy, or Volunteering Policy. If this institution is indeed found to be aligned with EDP's policies, you must submit this request to your immediate supervisor in order to assess whether it is possible to involve the Company in offering support to the Sports Club.

Find out...



Related information

**EDP Group**

[Empowering communities](#)

[EDP Y.E.S. Program - You Empower Society](#)

[Principles of Sustainable Development](#)

[Social Investment Policy](#)

[Volunteering Policy](#)

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

[Stakeholder Relations Policy](#)

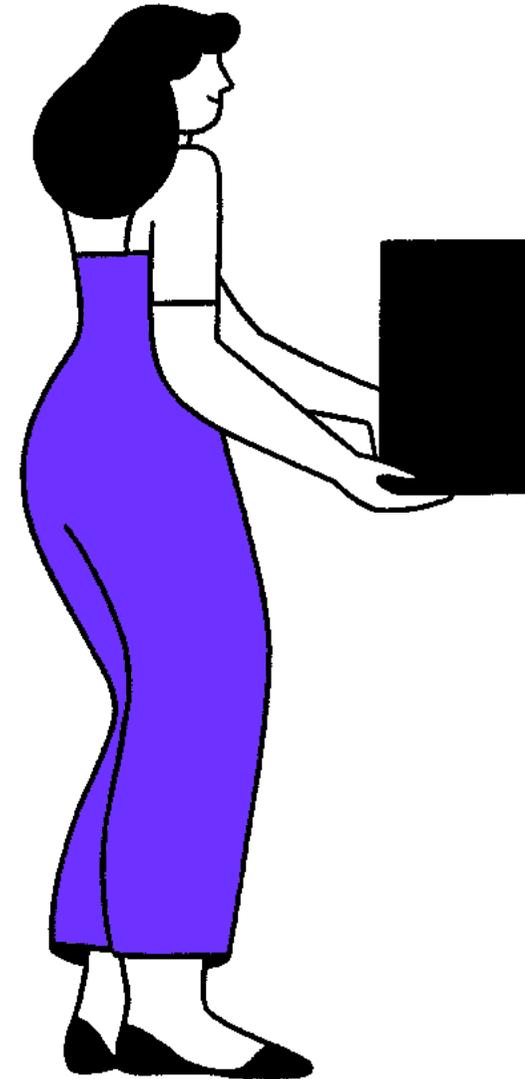
[Internal area dedicated to Social Impact](#)

## 2.5 Relationship with Competitors

Business development currently involves a very high level of competition involving a variety of different factors – gaining a market share, consumer choice, innovation, talent, visibility before stakeholders, among others – which requires unified efforts and **respect for stakeholders and competitors**.

It is also important to keep in mind that antitrust legislation is now very demanding and restrictive in most countries, and non-compliance involves severe penalties that can affect the credibility and reputation of institutions.

The requirement to comply with the highest ethical standards and the expression that EDP has today on a global scale, both in terms of the areas of activity in which it operates in the energy sector and in terms of the regions in which it is represented, gives it a significant responsibility in this regard, since the **integrity and good reputation** in business practices is decisive for strengthening the confidence of its customers. EDP therefore seeks to guarantee full compliance with **best practices for market competition**, offering employees training in national and international antitrust laws and prohibiting any practices that restrict competition, even in countries in which legislation in this area does not exist.



We must

01.

Whenever doubt exists regarding the conformity of the behaviors practiced or observed with regards to competition – whether in relation to competing companies, clients or suppliers, in representing professional or sector associations and analyzing or developing proposals for mergers, acquisitions or bilateral agreements, among others – consult with the entities responsible for these matters at the Company while maintaining a holistic and prudent approach.



02.

Be particularly careful when providing oral and written communication regarding the Company's strategic information, effective prices, quantities, client portfolios, business volume, production costs, investments, sales, among other aspects, in order to ensure that doubt does not exist with regards to compliance with antitrust rules and adherence to required ethical standards.

We must not

01.

Adopt any practices that are prohibited under antitrust legislation.



02.

Use, under any circumstances, information regarding competing companies obtained through illicit means, or that violate existing antitrust legislation.

Examples

Question



I have been informed by a person working at a competing company that this organization will soon no longer be able to commercialize electricity.  
Should I raise the price of our offer on the marketplace?

Answer

No. This information may come to constitute evidence of collusion between market agents; therefore, you must immediately request that this information be disclosed by other market agents (ideally while offering a record of their position) and, as soon as possible, inform the responsible Management area and/or EDP's Legal Counsel of the situation.

Question



I was informed through informal channels that a direct competitor is close to insolvency. I know that if we run a campaign offering discounts that are below the cost of services, this competitor will have to abandon the market within three months.  
What should I do in this case?

Answer

You must continue to act independently in accordance with EDP's established commercial strategy and refrain from implementing predatory pricing, which, in addition to constituting a violation of market competition, would also be reprehensible from an ethical perspective.

Find out...



Related information

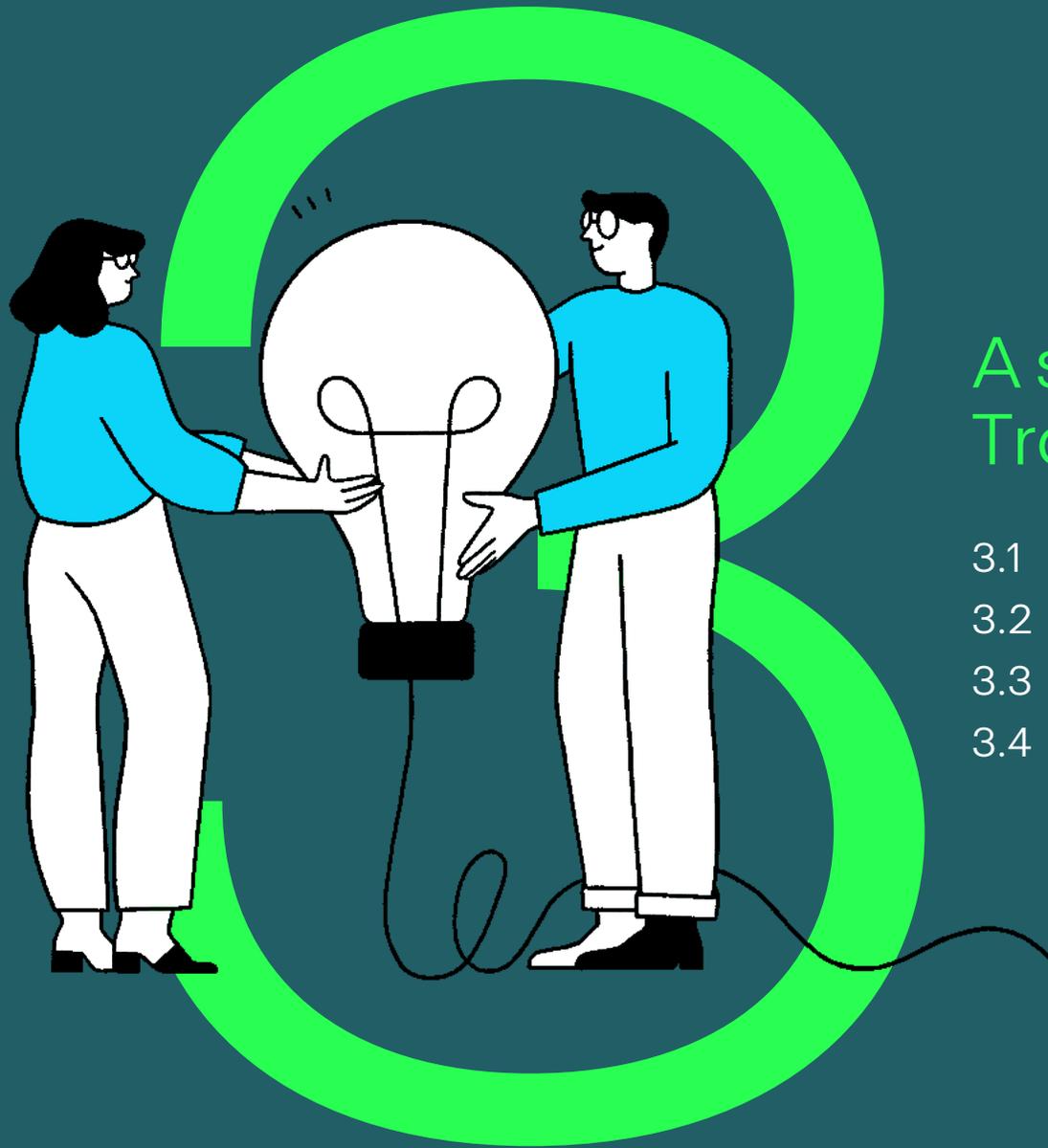
**EDP Group**

[Healthy Market Competition Practices](#)

**EDP Brazil**

[Standards for the Prevention of Illicit Acts](#)

[Compliance Standards](#)



## A sector in Transformation

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

# 3.1 The Environment

**We consider our natural environment to be a source of value that we are obligated to preserve.**

A healthy organizational culture of environmental risk management is key to **reducing our ecological footprint**. We are therefore committed to implementing the best solutions for avoiding and mitigating, and whenever necessary, compensating for the environmental impacts of our business activities and working to improve our performance in this regard each day.

EDP seeks to effectively address risks and opportunities by integrating environmental management into business processes, strategies and decision making, aligning them with remaining business priorities and incorporating environmental governance into our global management system.

**The success of our environmental policy depends on the commitments we make, as well as our way of thinking and acting, and the influence we have on others.**



We must

**01.** Employ the precautionary principle whenever our activities may result in serious and irreversible damage to human health or the environment, even in cases in which such effects are uncertain, but scientifically plausible. In these situations, if damage to the environment or health of others does occur, we must assist the scientific establishment in helping us make the best possible decisions.

**02.** Align our activities with national and international environmental protection strategies and best practices.

**03.** Promote environmental awareness by acting as mobilizing agents in the defense and protection of the environment.



**04.** Deepen our knowledge of environmental risks and the impact that our activities have, using procedures for risk assessment and opportunities for addressing climate change in order to improve decision making.

**05.** Actively promote the development of technologies that are environmentally sustainable throughout the value chain.

**06.** Collaborate with environmental authorities and actively listen to other stakeholders in order to consistently improve our environmental performance.

**07.** Promote our environmental policy internally and among our partners and remaining stakeholders.

**08.** Promote and collaborate in fulfilling the United Nations' Sustainable Development Goals.

We must not

**01.** Use or authorize materials/ products, technical solutions and/ or internal operational processes or subcontracting that endanger or damage the Environment while consistently favoring alternatives that are less harmful to the Environment and economically competitive.

**02.** Ignore or neglect situations that pose a risk to the Environment, legal compliance at the Company or defraud the expectations and needs of stakeholders.

**03.** Make it difficult to analyze accidents or near misses involving the environment by refusing to participate or omitting relevant information.



Question



A piece of equipment from one of our production units has broken down. Although the plant can continue to produce, the levels of pollutants that will be emitted will rise considerably, exceeding the limits imposed under existing environmental permits until the device is replaced. Repairs are expected to take four days, which is the time required to purchase and receive the equipment. Should I stop production even though I know that this situation will result in a breach of an existing supply agreement?

Answer

Yes. You must immediately stop production and repair the equipment in the shortest period of time possible.

Question



On a weekend walk out with my family I found waste cables and packaging for hazardous products near a facility of ours that had recently received maintenance. What should I do in this case?

Answer

You must immediately report this situation, preferably to the area of the Company that was responsible for these works, and request that the waste left at the construction site be collected and sent to a licensed Waste Management Operator. Pre-existing environmental conditions at the site must also be restored

Question



I am part of the team at EDP that is responsible for coordinating works and in the course of one of these works, I notified those responsible of the fact that toxic waste that should otherwise be sent to the landfill was being burned. These individuals stated that they were only doing this on exceptional basis in order to be able to complete the works in question on time. I now have no idea whether I should ignore it, because I have already fulfilled my responsibilities in relation to these works, or if I should report the situation since it is putting the companies that are working here at risk, as well as causing environmental pollution.

Answer

You must report the situation in writing to the contract manager. This will allow EDP and the remaining companies involved to be able to comply with applicable legal obligations. In this case you would be proceeding in accordance with applicable laws and internal procedures regarding environmental legislation, ensuring that the environment, facilities, and individuals involved are not placed at risk.

Find out...



## Related information

### **EDP Group**

[Protecting our planet](#)

[Sustainability Commitments](#)

[Environmental Policy](#)

[Materiality at the EDP Group](#)

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

[Internal area dedicated to Sustainability](#)

## 3.2 Energy transition

The world is undergoing a profound transformation process as we seek to implement sustainable development. One of the major challenges faced as part of this process is how we will be able to **slow down climate change** while implementing a **fair energy transition**.

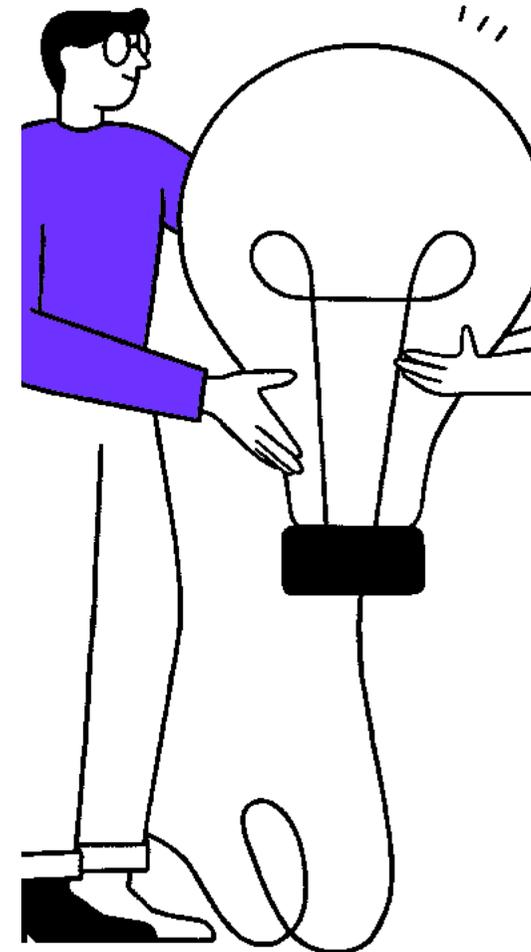
The worsening climate change means that humankind currently faces an urgent need to reduce CO<sub>2</sub> emissions. If global warming is not limited to a maximum of 1.5 °C, extreme weather events, natural imbalances and rising oceans will have a devastating effect on infrastructure and cities, as well as employment, health and social well-being. The potential consequences on the environment and biodiversity will also be incalculable and staggering in nature. Urgently addressing the climate crisis means that companies must assume an ethical duty to substantially **reduce and eliminate greenhouse gases** wherever possible.

At EDP we are working each day to lead the energy transition, taking advantage of our ability to adopt new technologies and generate added value for our stakeholders. We act in a manner that is oriented by potential impacts and

anticipates future challenges, adopting the courage required to actively promote change.

The Company is committed to achieving carbon neutrality in its activities by encouraging the reduction of emissions among business partners and empowering local communities. EDP will continuously promote **energy efficiency and replace fossil fuels with renewable energy** throughout its value chain, seeking to contribute to a new emerging economy and ways of life that respect the planet and promote social well-being.

From EDP's perspective, **electrification is an essential area of decarbonization within the economy when produced using renewable energies**. Through means of a process of continuous innovation, the production of renewable electricity is expected to increase and eventually replace the consumption of fossil fuels in services, industry and transport. Whenever electrification is not a viable solution, technologies such as green hydrogen (which also produced from renewable energies) are capable of ensuring the remaining decarbonization that the planet requires.



We must

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

02. Develop contingency plans and expand the resilience of infrastructure in order to be able to withstand the occurrence of extreme events.

03. Develop intelligent management systems for energy production and consumption.

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

05. Contribute to an increase in “energy literacy”, both internally and externally, thereby allowing EDP and the population in general to develop an increased capacity for interventions as part of a fair and equitable energy transition.

06. Promote the development of public measures aimed at combating energy poverty and protecting of vulnerable consumers.

07. Stimulate the development of energy efficiency measures and low-carbon services together with clients.

08. Contribute to increasing the use of renewable energy in buildings, transport and industries.

09. Expand awareness of climate change and the need for energy transition.



We must not

01. Implement solutions or make investments without first analyzing their potential impacts on the climate, the environment and society and ensuring compliance with EDP’s Code of Ethics and Policies.

02. Acquire products or services without first assessing their potential impact on the production and supply chain and ensuring that the sustainability principles assumed by EDP will remain intact.

03. Abandon both in an individual and collective manner efforts aimed at moving towards decarbonization and a just and inclusive energy transition.



Examples

Question



My team at EDP is planning a series of work meetings that involve travel to a variety of different regions. I suggested that we replace at least part of these trips with online sessions. Although my proposal was not appreciated, did I do the right thing?

Answer

Yes. You did the right thing. Any act that is in line with EDP's commitments to reduce CO<sub>2</sub> emissions is the most appropriate option.

Question



A supplier of wind energy production equipment for self-sufficient installations contacted me to ask whether EDP would potentially be interested in developing a partnership in order to sell its products. I explained to this person that EDP produces and sells its own energy and therefore would not be interested in solutions that would reduce the consumption of energy originating from existing grids. Did I do the right thing?

Answer

No. First of all, it is important to remind the supplier that EDP has instituted a comprehensive market consultation process to which all suppliers are subject. Secondly, it is important to remember that self-sufficiency is an essential part of the energy transition and something that we must encourage because it helps to raise general awareness about the challenges we currently faced. Self-sufficient energy production helps to reduce emissions, losses, and investments and supports the electrification of consumption.

Find out...



Related information

**EDP Group**

[Leading the energy transition](#)

[Sustainability Commitments](#)

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

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

[Internal area dedicated to Sustainability](#)

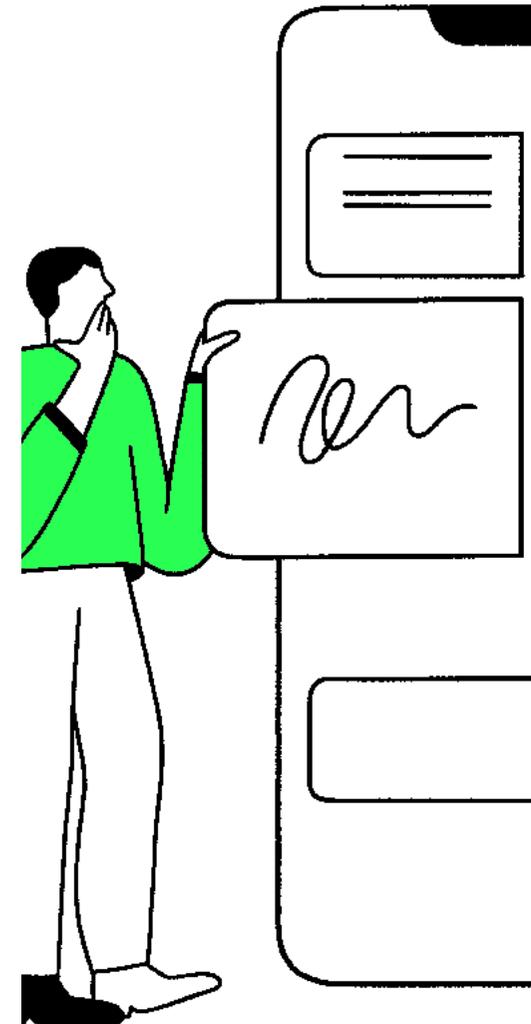
## 3.3 Digital revolution

Technology is a key element of EDP's strategy and is decisive in the manner in which the Company manages its assets and develops relationships with clients and stakeholders in general.

The digital revolution that we have seen in recent years represents an opportunity to build a better society, one that best serves Humanity's interests. Skills can be increased and more balanced life solutions can be integrated into our day-to-day activities within professional contexts, as well as with regards health and well-being in general. This revolution, however, brings about new risks that can have a significant economic impact on the lives of individuals and society as a whole and therefore presents an ethical aspect.

EDP is aware of its responsibility in this regard and recognizes the need to **ensure that information systems are managed at all stages of the information lifecycle in a manner that is careful and ethical**. This includes system design, the selection of sources, development of knowledge, the integration and analysis of data, as well as the development of analytical model algorithms. The issue of cybersecurity deserves particular attention, and EDP has reinforced its efforts to implement dedicated cybersecurity systems.

The Company is aware of the need to carry out a **systematic assessment of ethical risks** as part of its business activities, with a specific focus on the use of Artificial Intelligence in different ventures, thereby **ensuring the quality of its business data** and the consistent implementation of robust and updated cybersecurity procedures.



We must

**01.** Identify, evaluate and document ethical risks during the phase prior to the design or acquisition of technologies, particularly with regards to disruptive technologies such as Artificial Intelligence, robotics or 5G.

**02.** Ensure that ethical criteria are included in decision making process beginning with the system design phase, guaranteeing the applicability of the concepts of digitalization for the benefit of society in general and offering a proportional amount of human control for all autonomous and critical systems.

**03.** Prevent, including during the design stage, ethical risks through the use of quality assurance processes and integrity in data and methods provided through means of a clear understanding, and respective registration, of the data and algorithms involved.



**04.** Ensure the transparency and interpretability of results obtained, ensuring that they are capable of being subject to auditing and reproducible.

**05.** Guarantee the security of data, systems and analytical models, taking into account the potential risks associated with a security breach and complying with the Group's information security policy and standards.

**06.** Consistently monitor systems, including from the perspective of potential ethical impact.

**07.** Encourage users and producers of technology to adopt a culture of accountability for the impacts associated with their activities, thereby ensuring that the necessary training is provided.

**08.** Encourage individuals to take responsibility for identifying opportunities for improvement and efficiency, implementing increasingly sustainable objectives through the use new digital technologies.

**09.** Make consistent effort to foster the development of employees that are capable of adapting to technological transformation, offering the necessary training, reconversion and adaptations and developing qualified functions for professional trajectories that are sensitive to existing ethical risks within the area of technology.

**10.** Promote employment within the field of science that attracts individuals offering highly-specialized knowledge of new technologies while seeking to ensure that EDP is able to retain such talent.

We must not

**01.** Allow the development of analytical systems or models that promote or result in some form of injustice or discrimination.

**02.** Allow the acquisition and development of systems that do not adhere to best practices for cybersecurity, thereby having a negative effect on clients and society.

**03.** Ignore signs of ethical impacts caused by any technology that is currently in use and not report such occurrences.

**04.** Allow documentation to be improperly stored, particularly when there is personal data involved, in order to avoid negative impacts on the company, clients, suppliers and society in general.



Examples

Question



Answer

I have noticed that a computer program that was recently acquired seems to have systematic bias that penalizes females at a higher rate, although I am not absolutely certain of this fact. Should I report my suspicion to anyone or just keep an eye out?

When in doubt, you must immediately notify management of your concern, in order for a comprehensive and accurate assessment of your suspicions to be carried out.

Question



Answer

I am part of a working group that is developing an application that makes use of Artificial Intelligence and I believe that limits are not being correctly imposed on the algorithm or, in other words, “the machine’s performance”. I’ve brought this up with the group on more than one occasion, but everyone thinks I’m being an alarmist. I am convinced, however, that we are not carrying out an adequate risk assessment for this project. What should I do in this case?

You must once again bring this concern to the head of the working group and, if they are still not addressed, use the existing reporting channels.

Find out...



Related information

**EDP Group**

[Our digital transformation](#)

Dedicated internal department:

[Digital Transformation](#)

[Security in Information Systems](#)

**EDP Brazil**

[Information Security Standards](#)

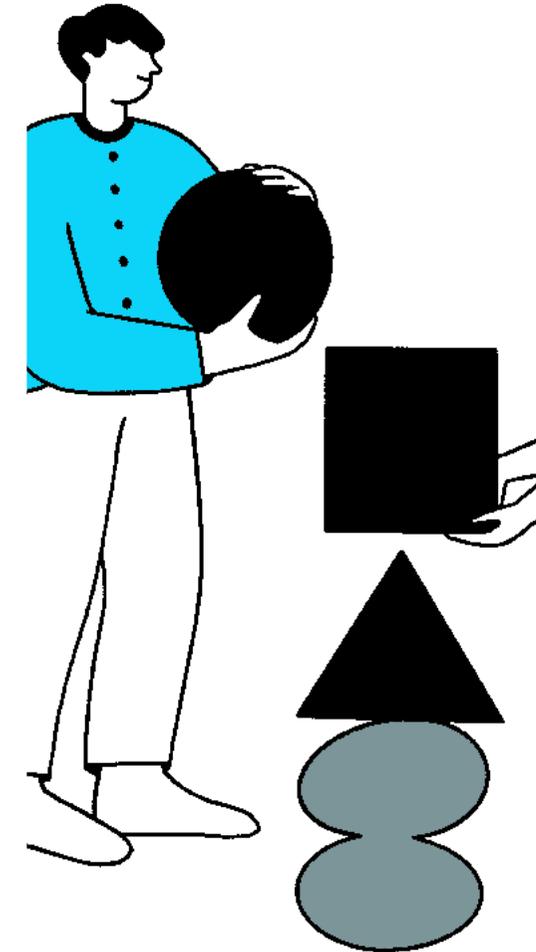
## 3.4 Entrepreneurship and Cooperation

In an era in which technology and society are evolving at a faster rate than market developments, EDP, as part of its efforts to anticipate related impacts and opportunities, **is committed to promoting innovation, creativity, collaborative practices, research, technological development and knowledge management within the field of energy.**

We are currently witnessing a transition between competition that is focused on factors that are tangible in nature to a notion of competitiveness in which an emphasis is placed on new working methodologies and, increasingly, on networks between companies. These networks are used to coordinate efforts and cooperate through means of dynamic structures that exist for variable periods of time.

Within a digitally interconnected world, business ecosystems are expanding and are now more complex than ever. Although these ecosystems generate value, they also inevitably result in corporate risks arising from actions taken by external parties. The first line of defense must be redefined and can no longer be limited to organizations themselves, but rather extend within a broader network that generates value for stakeholders.

Within this emerging paradigm, **the ethical performance of various stakeholders and their risk management practices** become fundamental to ensuring that the rapid pace of transformation and innovation does not overtake the ethical principles that are put into practice by EDP and its employees.



We must

01. Encourage collaborative and cooperative practices that focus on a common objective.

02. Ensure that partners comply with EDP's Code of Ethics within emerging ecosystems.

03. Promote an attitude of openness and transparency in order to learn from past mistakes.



04. Seek to promote balanced relationships that involve expectations appropriate to the stage of maturity presented by the entities involved.

05. Develop test environments that are appropriate to the technologies and/or business models that are to be studied to ensure that associated risks can be controlled.

We must not

01. Violate the confidentiality of information to which we have access and, in particular, avoid exposing third-party intellectual property to situations that potentially allow such property to be appropriated by other entities.

02. Make personal investments in opportunities identified within the context of the Company itself.



Examples

Question



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

Answer

In a general sense, no. However, there may be exceptions that must be analyzed together with your immediate supervisor.

Question



A group of startups with which we will begin working on collaborative projects asked me if I could organize a session for the sharing of best practices (benchmarks) with regards to implementation of EDP's Ethics Program.  
Am I able to organize these sessions?

Answer

Yes. EDP has the habit of sharing its best practices within the scope of ethics so that we are able to share them with these organizations that will become part of our ecosystem.

Question



A friend asked me why EDP is investing in startups as an alternative to other potential investments.  
How should I respond to this question?

Answer

You should tell you friend that the objectives behind EDP's investment in startups are not exclusively financial in nature. EDP believes that these new companies, which are generally dedicated to research and innovation, enhance the creation and transfer of technical knowledge, thereby promoting efficiency and new business activities, as well as allowing new working methodologies to be developed. Therefore, these investments are made as part of efforts to obtain not only a financial return, but also develop a strategic relationship that generates mutual value (in addition to financial returns) for EDP and the startup.

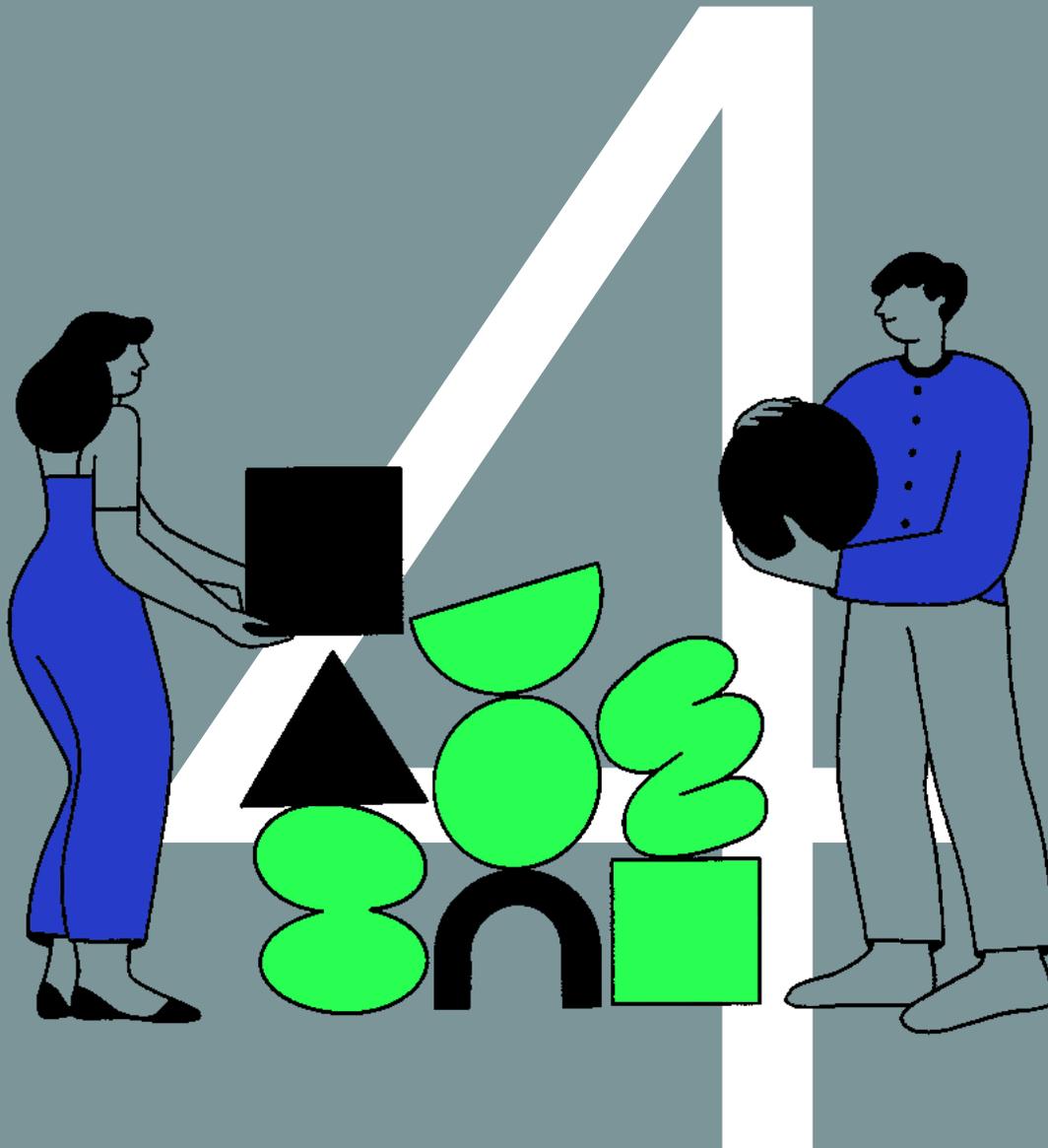
Find out...



## Related information

**EDP Group**

[Stakeholder Relations Policy](#)



## Acting with Integrity

- 4.1 Corruption and Bribery
- 4.2 Conflicts of Interest
- 4.3 Gifts and Entertainment
- 4.4 Money Laundering and the Financing of Terrorism
- 4.5 Privacy and Personal Data Protection
- 4.6 Use of Company Information
- 4.7 Use of Company Assets

# 4.1

## Corruption and Bribery

The practice of illicit activities, involving either an act or omission, such as corruption or influence peddling, jeopardizes the peace, security and well-being of citizens, as well as the stability of financial markets. These practices also undermine the principle of democracy and the rule of law, diverting resources that are necessary for the growth and development of society, and promoting instability, insecurity and mistrust among citizens. Therefore, as part of a **zero-tolerance approach, the prevention and fight against corruption and bribery has been increasingly expanded** at the global level through the adoption of laws and the promotion of cooperation between private entities and government authorities.

**EDP prohibits the practice of corruption and bribery, whether carried out in an active or passive manner** and through acts or omissions, including the development and maintenance of situations that are marked by favoritism involving facilitation payments or other irregularities.

EDP has **policies and procedures in place that seek to prevent, detect, address and control situations involving corruption.**



We must

01. Anticipate and offer clarification in situations that may constitute or come to be understood as involving corruption or bribery.

02. Respect the obligation exemption of to which employees and those responsible for government bodies are subject, avoiding any acts or omissions that may directly or indirectly offer a fraudulent, coercive, manipulative or misleading influence, and refrain from offering or promising any undue form of benefits.

03. Promote an awareness of and comply with and enforce internal rules regarding facilitation payments, political contributions, donations and sponsorships, offers and invitations to events, interactions with public officials and politically exposed persons and the prevention and management of conflicts of interest.



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

05. Report any warning signs or actions that may be associated with a potential act of corruption or the receiving or improper offer of advantages or any other illegal, criminal or administrative offenses using the appropriate channels.

We must not

01. Request, accept, provide or promise gifts, prizes, loans, accommodation, personal services or other gratuities provided as part of preferential treatment to clients, suppliers, government authorities or any other person or entity related to the Company's business that may result in some form of improper personal advantage or benefit for the Company or third parties.

02. Request, accept, provide or promise any inappropriate economic or non-economic advantage.

03. Provide monetary or other forms of contributions to political parties on the Company's behalf.

04. Recommend suppliers or companies to client that may be related to the Company's businesses, including indirectly, even if such recommendations are requested.



Examples

Question



While completing the certification process for an installation I discovered a defect that will result in this certification being denied under applicable legislation. The client was very upset with this turn of events and offered me to repair the equipment myself as a contractor. I know that these regulations are sometimes a bit overboard and this facility did not present any serious risks. Can I repair the equipment myself before approving the respective certification given that I have the necessary technical expertise to do so?

Answer

No. You must inform the client that you have no alternative but to deny certification of the installation and explain the identified defect in detail so that the client is properly informed. This way you will be complying with applicable legislation, not putting the client at risk and adhering to Company standards. Additionally, the client may conclude that they had an influence on your decision to deny the certification and attempt to offer you an advantage in order to receive the certification.

Question



A supplier plans to offer me a trip to attend the final of a major sporting event. This supplier wants to be contracted in order to be able to provide services to EDP. Can I accept his offer?

Answer

No. The acceptance of offers/invitations is prohibited in situations in which the respective parties are involved in negotiations, bidding processes, or an upcoming or recent review of contracts, unless they are a form of courtesy that is appropriate within the given context. The acceptance of offers must comply with the rules and limits defined internally at EDP with regards to values and frequency. Otherwise, they must be approved by Senior Management, and the Compliance department must be notified.

Question



The inspector from a government body responsible for the licensing of a facility that I am managing, expressed concerns regarding the safety of one of the pieces of equipment used in the installation. He therefore informed me that it would be necessary to carry out additional safety tests that could take several weeks before clearing the operating licenses, unless he was paid an "urgency fee", in order to be able to prioritize these additional tests. The deadlines initially established for the start of activities in the installation have already passed and this additional delay may further compromise my department's ability to achieve established targets. Can I provide the inspector with this payment and consider it to be an expense associated with licensing the facility?

Answer

No. A payment of this type, one that is made directly to an inspector, may be considered a crime involving corruption or the undue offer of advantages in order to overcome obstacles in the licensing process. You should check with the licensing authority to see if there is a process available that allows you to deal with urgent matters, ensuring that all necessary safety tests are carried out as quickly as possible and licensing expenses are properly supported by documentation.

Find out...



## Related information

[Compliance](#)

[Integrity Policy](#)

[Social Investment Policy](#)

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

[EDP Supplier Code of Conduct](#)

[Internal area dedicated to Integrity](#)

### **EDP Brazil**

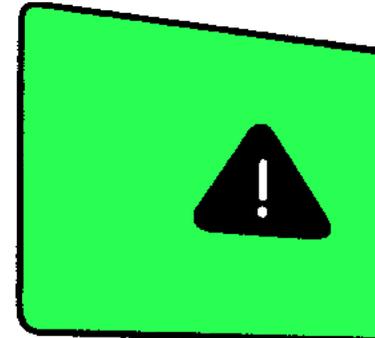
[Standards for Gifts, Prizes and Events](#)

## 4.2 Conflicts of Interest

A conflict of interest is a situation in which the purposes or advantages that are designed to be obtained through a given act are likely to interfere with the fulfillment of obligations for impartiality and objectivity or the protection of EDP's interests. Conflicts of interest may be apparent in nature, or situations that may be interpreted as constituting a Conflict of Interest but that are not actually a conflict of interest; or situations from which a real Conflict of Interest may arise in the future.

**Any conflict of interest, even if apparent, may negatively affect the Company's reputation or that of the employee or partners involved.** The general rule at EDP centers on **transparency**. This means recognizing and disclosing all situations that create, or appear to create, conflicts of interest between our personal interests and those of EDP.

EDP has policies and procedures in that ensure **impartiality and exemptions from decision-making processes** in situations involving potential conflict of interest in relation to the Company, employees or partners.



We must

01. Always act in a manner that guarantees that our own interests, or the interests of our family or third parties with which we maintain a relationship, do not take precedent over the interests of EDP and its stakeholders.

02. Notify management and remove ourselves or promote our removal from the respective decision-making processes in all situations that may generate conflicts between personal interests and our duty to remain loyal to the Company, including: familial or equivalent relationships that exist within the Company's direct hierarchical structure or related positions; the exercise of external professional activities that interfere with our duties or the Company's activities; legal or financial positions, or positions held by family members that may potentially interfere with the Company's interests or business activities that are carried out.



03. Remain aware of existing limitations to the transfer of assets and the contracting of services to stakeholders on the part of EDP in order to ensure that we comply with applicable internal regulations.

04. Develop an in-depth understanding of the procedures used to prevent, identify and resolve conflicts of interest, either in general terms or with respect to Business Activities involving Related Parties when included within the scope of EDP's Policy on Related Party Transactions.

05. Obtain authorization from management to carry out other professional activities whenever such activities do not result in a deterioration in work performance or interfere with the Company's obligations and do not present a risk of conflict of interest. Such conditions must be duly confirmed by the respective company's Compliance department.

We must not

01. Use information that we come to have access to as EDP employees, as well as any decision-making authority, to obtain personal advantages or benefits for family or friends.

02. Carry out external professional activities, both with or without remuneration, that impede the fulfillment of our professional obligations or negatively affect EDP's activities or interests while negotiating on our own behalf or that of individuals or entities that compete directly with the Company.

03. Involve the Company in our personal opinions on partisan politics, as well as religion or sects of any kind.



Examples

Question



A supplier, who is also a family member, is participating in a competitive process involving the purchase of equipment by EDP, and I am involved in the quotation process. This supplier is a well-positioned candidate in terms of the requirements established under our technical specifications and is likely to be awarded the contract.  
What should I do in this case?

Answer

You must immediately report the situation to your Company's Compliance department and your immediate supervisor. You will also need to remove yourself from the review and decision-making process as part of this contracting due to the fact that this situation constitutes a conflict of interest.

Question



I learned from a partner that one of EDP's suppliers will soon be trading shares on the Stock Exchange. The acquisition of shares from this company seems to be an excellent opportunity to invest part of my savings.  
Can I invest in this company without having to be worried?

Answer

Holding direct or indirect financial assets (through means of family members, for example) in third parties that maintain a relationship with EDP, such as suppliers, may result in a conflict of interest. It is therefore recommended that you notify the Compliance department of the situation in order for them to carry out an assessment.

Question



I am taking part in a selection process in which one of the candidates seems to have a profile that is most suitable for the vacancy. It turns out, however, that this person is one of my friends. I wanted to recommend this candidate, but I am afraid that such an act may be or may appear to be a conflict of interest.  
Do conflicts of interest only apply to family members or does it also include these types of situations?

Answer

Conflicts of interest may involve family members or friends, so in this case you must notify your immediate supervisor and the Compliance department of the personal relationship that you have with this candidate and remove yourself from the decision-making process.

# Examples

## Question



## Answer

My brother-in-law expects me to intervene internally in resolve a dispute he has with EDP. He says that he is tired of trying to resolve the issue over the phone and that there is no doubt in his mind that he is in the right. Can I intervene in the dispute on his behalf?

No. You can try to identify the problem internally in order help your brother-in-law, but you cannot seek to resolve the issue or request that the Company to act in a manner that unjustifiably benefits your family member.

## Question



## Answer

A friend asked me to be his partner in a commercial venture that offers services to a company that is part of the EDP Group. He considers the fact that I work at EDP to be of considerable help, as I have access to information that may represent a competitive advantage. Can I accept his offer?

No. This situation involves a conflict of interest. You must notify your company's Compliance department and your immediate supervisor and follow any recommendations that you receive.

# Find out...



## Related information

### EDP Group

[Compliance](#)

[Policy on Related Party Transactions](#)

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

[EDP Supplier Code of Conduct](#)

[Internal area dedicated to Integrity](#)

### EDP Brazil

[Standards for the Prevention of Illicit Acts](#)

[Compliance Standards](#)

[Procedure for Management and Prevention of Conflicts of Interest](#)

## 4.3 Gifts and Entertainment

The practice of offering gifts, invitations and courtesies, in addition to being legitimate Company expenses, are also a relevant and standard aspect of developing and maintaining business relationships. Such practices may, however, be used to conceal corruption or the improper receiving or offer of advantages. The exchange of any economic or non-economic advantages can therefore only be carried out in a manner that strictly adheres to applicable laws, policies and procedures and through which the principles of moderation and proportionality are applied.

**Any offer of gifts or entertainment must be provided in a manner that is transparent and socially appropriate** in accordance with accepted usage and customs and **reasonable** within the context of professional courtesy. Such offers must be **supported** by information networks that transfer decision making powers with regards to such practices to members of the Company's management.

At EDP **we do not offer or receive gifts that may generate inappropriate perspectives** on the Company with regards to business decisions or the offer of improper advantages.

EDP has procedures in place that systematize the principles guiding business activities, duties and rules that are to be observed in designating and receiving offers and participation in events, therefore reinforcing **mechanisms aimed at preventing and combating the practice of illegal acts**, in particular conduct associated with the crimes of corruption and bribery.



We must

01. Disseminate, comply with and enforce internal rules regarding the receiving and offering of benefits (e.g. gifts, meals and entertainment, travel and accommodation).

02. Register and justify, obtaining necessary approval from Senior Management, any offers made and/or received that, due to their exceptional nature or the fact that they exceed internally defined limits in terms of value or frequency, may be considered an attempt to influence decision making or obtain undue advantages.



03. Report any warning signs, acts or omissions that may be associated with the offer of potential improper advantages of both an economic and non-economic nature.

04. Act to ensure that external perceptions of the Company's actions in this area are always transparent and unequivocal with regards to our integrity.

We must not

01. Provide, accept, or promise gifts, prizes, loans, accommodation, personal services or other gratuities provided as part of preferential treatment to clients, suppliers, government authorities or any other person or entity related to the Company's business that may result in some form of improper advantage for the Company or third parties.

02. Provide, accept, or promise any inappropriate economic or non-economic advantage.



Examples

Question



A vendor has sent me an invite to the private area (“VIP”) for an event for which tickets are not made available to the public. Can I accept this invite, since this offer is not clearly associated with a particular amount?

Answer

This must first be reported to management. At the same time, in accordance with the existing EDP Standard for Gifts, Prizes and Events, all situations involving an offer of gifts or invitations must be submitted through the Service Portal and assigned a designated service ticket. The Compliance department will then offer an opinion with regards to participation in the event in question.

Question



We’re about to close on a new deal with a foreign client. The transactions involved in this agreement are essential to achieving my department’s objectives. The individual from the client that is responsible for the deal is located in Fortaleza, so I thought it would be a good idea to offer him a weekend trip to Jericoaquara as a courtesy. Am I able to offer him this trip?

Answer

No. Offers to client must be reasonable and never made when the two parties are involved in negotiations, bidding processes, or approaching the date of an upcoming contractual review due to their potentially being associated with acts of corruption and/or the offer of undue advantages. Guaranteeing integrity in contracting processes and EDP’s reputation on the market are more important than any new contract. The Compliance department must be consulted for further clarifications.

Question



As part of my work duties, I am responsible for organizing meetings, events and trips. One of the hotels we usually work with has offered me a room for the weekend in order for my parents to be able to celebrate their wedding anniversary. Am I able to take the hotel up on its offer?

Answer

No. Even if a benefit is provided to members of our family, accepting this offer would negatively affect your impartiality when organizing future reservations on EDP’s behalf. It is necessary that you politely refuse the offer and clearly explain your reason for doing so.

Find out...



## Related information

### **EDP Group**

[Compliance](#)

[Integrity Policy](#)

[Social Investment Policy](#)

[Code of Conduct for Senior Management  
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[EDP Supplier Code of Conduct](#)

[Internal area dedicated to Integrity](#)

### **EDP Brazil**

[Standards for Gifts, Prizes and Events](#)

## 4.4 Money Laundering and the Financing of Terrorism

EDP's business activities are guided by high ethical standards, business integrity and strict respect and compliance with existing legislation and regulations regarding the **prevention of Money Laundering and combating the financing of terrorism**. Accordingly, EDP adopts the procedures that are necessary in identifying the relevant counterparties for the business activities that it intends to carry out and commercial relationships are only finalized if there are no signs of irregularity.

EDP has implemented a series of policies and procedures under its Program for the Prevention of Money Laundering and the Financing of Terrorism – which includes measures that address the duties and legal requirements associated with such matters and identification procedures – Know Your Counterparty (**KYC**) and due diligence – Integrity Due Diligence (**IDD**). Such policies and procedures establish concrete measures that must be taken in order to guarantee compliance with the legal

and regulatory obligations that EDP is obligated to perform, taking into account the different characteristics presented by the various business areas and the potential risk of Money Laundering and the financing of terrorism.

In order to ensure that the **procedures** defined under the Program are properly implemented, a governance model was systematized, as well as the different roles and responsibilities that are to be respected in fulfilling EDP's legal obligations with regards to the prevention of money laundering and combating the financing of terrorism.

EDP employees must make every effort to ensure compliance with both **legislation** applicable to the different activities and jurisdictions in which we operate and respective internal procedures and are subject to training that allows them to best perform essential functions with regards to these issues.



We must

01. Report all suspicious situations that are cause for concern as soon as possible using internally defined channels and maintaining strict confidentiality.

02. Identify and develop an in-depth understanding of our counterparties under applicable laws, policies and internal procedures, including their respective beneficiaries, before entering into any business agreement or transaction in order to ensure that we are working with reputable counterparties and that funds do not originate from criminal activities or are in any way unlawful.



03. Review elements of counterparty identification at appropriate intervals and ensure that the funds involved continue to originate from lawful sources.

04. Exclusively receive and provide payments to and from entities that have been previously subject to internal identification procedures – Know Your Counterparty (KYC) and due diligence – Integrity Due Diligence (IDD), and with which we enter into contracts using the appropriate measures regarding integrity and the prevention of Money Laundering, which have been duly authorized in accordance with the respective internal procedures.

We must not

01. Develop a business relationship or carry out any operation if the counterparty is suspected of being involved in Money Laundering or the financing of terrorism or any other unlawful act.

02. Accept offers of gifts or prizes in the form of monetary amounts or that exceed the criteria established under Company standards or the respective contract.

03. Make payments without the respective authorizations and prior knowledge of the counterparty and associated transactions.

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



Examples

Question



Answer

A counterparty is in a hurry to finalize a contract. The financial return involved is extremely significant.  
Can I “speed up” the process?

No. Any contract must be scrutinized through means of procedures that have been instituted internally in compliance with pre-existing stages. Any changes to the process can result in a condition of non-compliance with regards to internal policies and procedures and potential consequences for the employee or collaborators that were responsible for such changes. Such alterations may also have negative impacts on EDP itself in terms of reputation or generate civil, criminal or administrative liabilities.

Question



Answer

I recent came across a business with a much level of profitability that was much higher than normal.  
Should I bring this up with management?

Yes. Any businesses with standards of profitability that are well above average must be rigorously scrutinized in adherence to internal procedures developed for this specific purpose.

Find out...



Related information

**EDP Group**

[Compliance](#)

[Integrity Policy](#)

[Internal area dedicated to Money Laundering and Terrorist Financing](#)

## 4.5 Privacy and Personal Data Protection

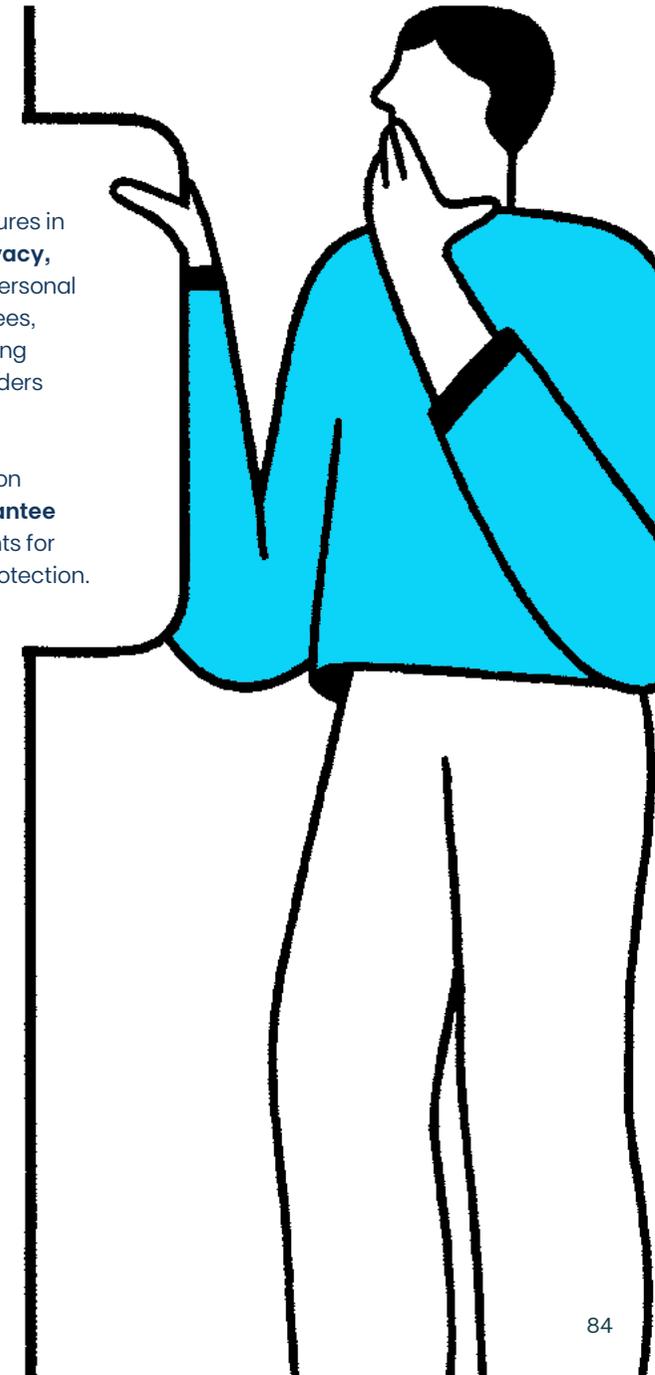
**Privacy is a fundamental right that must be guaranteed to all individuals.**

With regards to the processing of personal data, data holders are provided a series of specific rights that are aimed at guaranteeing their privacy and **protecting their personal data**.

EDP gathers, processes and retains personal data to the extent that is strictly necessary for achieving the specific purpose involved.

EDP has policies and procedures in place that guarantee the **privacy, security and protection** of personal data belonging to its employees, clients, suppliers and remaining subcontractors and stakeholders in general.

Designated suppliers acting on EDP's behalf must also **guarantee compliance** with requirements for privacy and personal data protection.



We must

01. Adjust the processing of personal data for legitimate purposes and ensure that access to data is provided on a “need-to-know” basis.

02. Respect the rights of data holders and guarantee a timely response to requests to exercise rights pertaining to data.

03. Provide data holders with information that is relevant to the processing of data with regards to the purposes for which the data will be used.

04. Ensure that the processing and storing of data is carried out safely by applying appropriate technical and organizational measures.

05. React immediately and appropriately in cases involving a violation of privacy and data protection requirements, promptly informing the department responsible.

06. Guarantee that suppliers processing personal data on behalf of EDP comply with rules for security and the protection of personal data.



We must not

01. Use personal data without having a justified and legitimate purpose for doing so.

02. Share personal data with third parties without the explicit consent of the data holder or another appropriate legal basis.

03. Transfer personal data outside the country of origin without first consulting with the Company’s LGPD department.

04. Collect and process sensitive personal data involving an individual’s health, sexual orientation, political opinions, religion, ethnicity, among other aspects, except as provided for under the law, or without the explicit, voluntary, informed and unequivocal consent of the data holder.

05. Store personal data for longer than is actually necessary.



Examples

Question



Our Service Provider responsible for distribution of emails has notified us that a significant number of Client emails were sent to the incorrect email addresses. I still have no information on what exactly caused this error. Should I report this situation?

Answer

Yes. Whenever you become aware of an incident involving personal data it must be immediately reported to the LGPD and Information Security department, even if you do not yet have all the information about what exactly happened.

Question



One of our partners urgently needs to hire an accountant, and one of our clients has the exact profile this particular partner is looking for. Can I provide this partner with the accountant's data, given that it is for the client's benefit?

Answer

No. The personal data to which we have access must not be processed for purposes other than that for which they were collected, unless explicit consent has been provided by the data holder or there is another legal basis to this effect.

Question



I am preparing a campaign for our clients involving commercial offers including gifts intended for personal use. I believe that the ideal means of selecting winners would be by using an automated system that is based on profiles and personal information. Can I select gift recipients in this manner?

Answer

No. Gathering profiles and automated individual decision-making can only be carried out in circumstances in which explicit consent has been provided by the data holder or there is another legal basis for doing so.

Question



I would like to send a surprise birthday present to a colleague's house. I asked the people management department to provide me with this colleague's address, and they told me they couldn't because it would be a "violation of privacy rights". I think the department's response was a bit over the top, should I report the situation?

Answer

You must not file a report in this case. The answer you received is appropriate due to the fact that we have to comply with the employee's right to the protection of personal data and privacy, and the disclosure of such data is prohibited for purposes other than those which led to its initially being gathered.

Find out...



## Related information

### **EDP Group**

[Compliance](#)

[Policy for Personal Data Protection](#)

### **EDP Brazil**

[Information Security Standards](#)

[Standards for the Prevention of Illicit Acts](#)

[Compliance Standards](#)

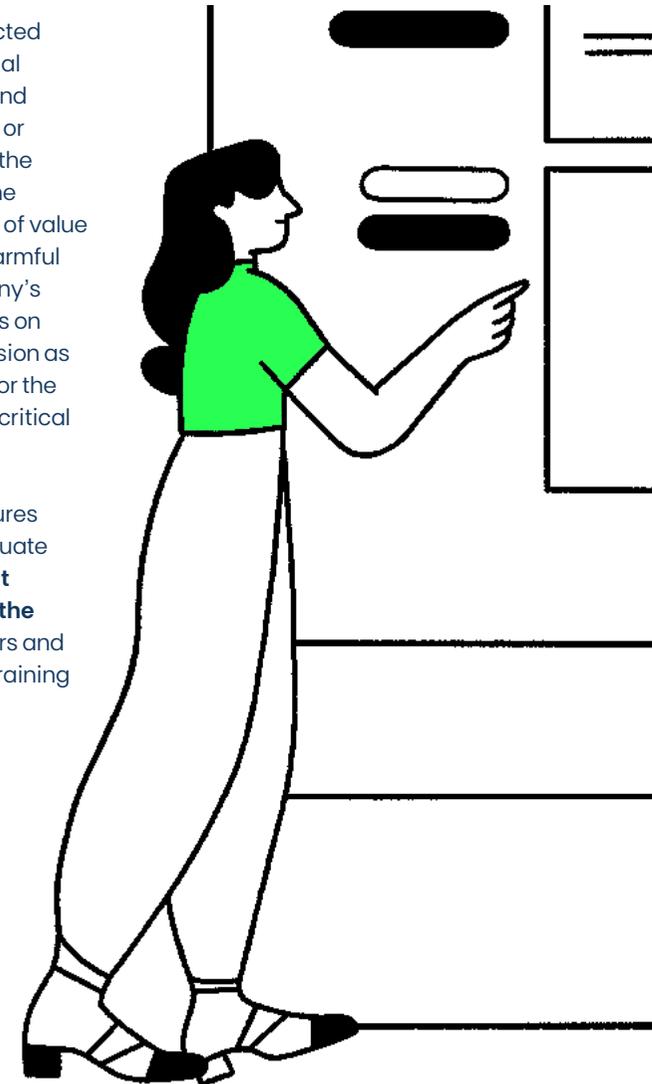
## 4.6 Use of Company Information

**Information** is a fundamental business resource; therefore, proper and responsible management of information is not only vital to generating increased advantages over the competition in terms of innovation, institutional image and competitiveness along the value chain, but also reducing the risk of its being misused, whether intentionally or not.

Given that information is an essential part of EDP's Assets, we guarantee not only its **confidentiality**, protecting it from being disclosed to unauthorized persons, but also its **integrity**, which means protecting EDP's information from undue changes. The availability of information is also essential. We therefore ensure that EDP's information can be accessed whenever necessary.

In an increasingly interconnected world, in which the use of social networks is becoming more and more prevalent, any incorrect or inappropriate information, or the disclosing of information at the wrong time, can lead to a loss of value and generate substantially harmful consequences for the company's image. At EDP, this onus takes on an even more relevant dimension as the Company is responsible for the managing and safeguarding critical energy infrastructure.

EDP has policies and procedures in place that provide for adequate **protection and management of information belonging to the Company** and its stakeholders and provides its employees with training in this regard.



We must

**01.** Consistently maintain confidentiality with regards to privileged, confidential and sensitive information, providing this information exclusively to those parties that are legitimately entitled to receive such information.

**02.** Whenever we are made aware of facts that may have a material influence on stock exchange quotations, up until the moment at which such information is officially disclosed: i) safeguard the information in question; and ii) refrain from trading securities with EDP companies, strategic partners or companies involved in transactions or maintaining relationships with EDP or related financial instruments.

**03.** Use the information to which we have access only within the scope of the purpose for which it was obtained, respecting the interests of both the Company and third parties.

**04.** Guarantee the integrity of information, protecting it from undue alterations during the introducing and processing of such information and its respective results, which may result in a loss of accuracy and/or consistency.

**05.** Guarantee the availability of information in order for it to be accessed whenever necessary.

**06.** Ensure that appropriate mechanisms for technical and organizational security are developed, thereby enhancing security with regards to the confidentiality of information.

**07.** Protect confidential information by promoting the implementation of a clean desk policy.

**08.** Update passwords used to access EDP's systems in accordance with internal policies.



We must not

**01.** Store and/or disclose any internal information with regards to business activities, research and development, clients, related parties and employees in circumstances in which we are no longer involved with the company.

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

**03.** Discuss or work with confidential information in a public, or even private, area in which the safeguarding of such information may be compromised.



Examples

Question



I was invited to lecture at a university and I think it would be interesting for my students to be able to analyze EDP's marketing campaigns. Can I discuss campaign strategies in class?

Answer

Campaigns are part of the Company's commercial products and assets and may even involve copyrighted materials. They therefore cannot be used for other purposes without receiving prior authorization.

Question



I learned, while overhearing a conversation between two directors, that a big project I'm working on is likely to be cancelled. No one has told me anything yet, but since my employment contract will also soon come to an end, I don't think it will be renewed. Can I post on my LinkedIn page that I will soon be available to take on a new professional challenge since the project I am working on may be canceled?

Answer

As a worker, you are obligated to remain loyal to EDP and refrain from disclosing information regarding its organization, production methods or business activities. Therefore, even if you are worried about not having your employment contract renewed, you cannot discuss the possibility of the project you are working on being canceled with anyone due to the fact that it is a confidential matter that has not yet been specifically disclosed.

Question



I need to finish and submit a report on a very important project that I am involved in for validation purposes. However, I am working in a public place and only have access to the data network that is available here. Should I connect to this public network in order to be able to send the report as soon as possible?

Answer

You definitely must not connect to this network since it is unprotected and can be accessed by anyone, including for malicious purposes. If there is no other alternative, you should preferably use mobile data rather than a public network or wait until you are able to connect to a secure network.

Find out...



## Related information

### EDP Group

[Information Security Standards](#)

### EDP Brazil

[Information Security Standards](#)

## 4.7 Use of Company Assets

Assets, whether tangible or intangible, belonging to companies or third parties that have placed their trust in EDP include the various resources that are made available to employees in order to be able to discharge their day-to-day work duties.

We all have a duty to **protect and use the resources that are in our possession in a responsible manner**, including, for example, computers, vehicles, intellectual property and even our own time. EDP's collaborators must be aware that the incorrect use or waste of resources will adversely affect our individual and collective performance and therefore the Company's inherent value.

EDP has policies and procedures in place that ensure that both its assets and those that third parties have entrusted to the Company are **properly managed in order to protect their value**.



We must

**01.** Guarantee that Assets, whether tangible or intangible, belonging to EDP or that have been entrusted to us by third parties, including computer systems and intellectual and industrial property, even if they have been produced by EDP itself, are exclusively used to execute business processes and are used efficiently and not subject to theft or loss.

**02.** Use any and all computer resources (hardware, software, application systems, electronic mail, Internet and LAN networks) in accordance with EDP's internal regulations.

**03.** Respect the inventions, intellectual works, models and industrial designs that have been both developed for the Company and exclusive belong to EDP.



We must not

**01.** Use the Company's resources for personal reasons in an irresponsible or unlimited manner. The limited and responsible use of communication tools (email, telephone, Internet) may be accepted as long as such usage does not interfere with our work responsibilities or the provisions contained in applicable internal regulations.

**02.** Use assets belonging to third parties (suppliers, partners, etc.) without express authorization from the respective owner of such assets.

**03.** Use technologies, methodologies, know-how and other proprietary or legal information belonging to EDP, its clients or suppliers for private purposes or share such assets with third parties.

**04.** Disseminate computer programs or any other content that may damage the Company's Assets or those of third parties.

**05.** Sell or donate EDP's assets without authorization.



Examples

Question

Can I bring some Company equipment that no one else uses and would be very useful for me home?



Answer

No. Even if the asset is at the end of its useful life, it must not be made available to anyone without first being receiving the necessary authorizations. All equipment is considered part of the Company's assets, regardless of whether they are currently being used.

Question

I accidentally destroyed a group documents and, afraid of what might happen, I didn't say anything to anyone. Now, my management is asking me about these documents and confirmed that they were sent to EDP, but that there is no record of their having been received. What should I do in this situation?



Answer

You will have to notify management or your having destroyed these documents unintentionally and take responsibility for any consequences. Not reporting the destruction of these documents immediately upon there having been disposed of alone is a serious omission. Failing to assume responsibility for your errors and making it impossible for to corrected such errors and mitigate the respective consequences is inadmissible.

Find out...



Related information

**EDP Group**

[Information Security Policy](#)

**EDP Brazil**

[Information Security Standards](#)

Learn more about  
Ethics at EDPBR...

# EDP Energias do Brasil's Ethics Committee

Companies that are listed on the stock exchange, such as EDP Energias do Brasil, have their own Ethics Committee. The EDP Group's Ethics Ombudsperson is a member of the Committee. EDP Energias do Brasil has adopted the EDP Group's Integrity policy, which is used to complement specific procedures that have been implemented to address certain legal and cultural realities faced by the Company.

## Communication channels available for addressing themes related to ethics.

Interactions between whistleblowers and the EDP Brasil Group with regards to matters involving ethics can be carried out through the Corporate Speak Up Channel. EDP Brasil offers 4 different means of filing a complaint, which are described below:

- 1) Telephone: 0800 59109 82  
(24 hours a day, 7 days a week)
- 2) Website:  
<https://www.edp.com.br/canal-de-etica/>
- 3) Email:  
[edpbrasil@contatoseguro.com.br](mailto:edpbrasil@contatoseguro.com.br)
- 4) Smartphone app: Contato Seguro
- 5) PO Box: nr. 81009,  
Contato Seguro, CEP: 04537-970,  
São Paulo/SP.

It is important to note that whistleblowers are able to interact with EDP's Ethics Channel through the platform. To consult a report, the whistleblower must note the filing number that is generated upon the complaint being made.

It is essential that the filing number be noted at the moment at which the complaint is registered since whistleblowers are able to use it to consult and answer any questions necessary in investigating the reported case.

# Procedure for managing contact carried out using the Corporate Speak Up Channel

## Scope of Application

This procedure applies to all reports filed through EDP's Corporate Speak Up Channel.

## Filing a Report

Reports from employees, clients, suppliers and/or other stakeholders should preferably be filed through the provided means of using the Corporate Speak Up Channel, namely: telephone, email, Internet, smartphone application and P.O. box.

Initial screening is carried out by an independent and specialized company whose main objective is to classify the report and arrange for it to be forwarded to the investigative team from EDP Brasil's Internal Auditing area.

Reports must include a detailed description of the situation involved and, as a matter of preference, the name and contact of the whistleblower or witnesses (if applicable) in order to facilitate contact from the internal investigation team and obtain information that may be required for investigative purposes.

The Corporate Speak Up Channel guarantees confidentiality even for those who identify themselves. Each report will therefore be treated as confidential, and the identity of the individual(s) making the report will be kept confidential to the furthest extent possible within the scope of the investigation.

Facts and documents related to the reports also remain confidential. Individuals that are given access to information regarding these cases as part of investigations are obligated to ensure the information to which they have access remains confidential.

The reports are periodically presented to EDP Brasil's Ethics Committee, which is made up of 2 (two) independent members, as well as the EDP Group's Ethics Ombudsperson. The Committee deliberates on the results of investigations and proposes the appropriate measures that must be taken for each situation.

It is important to note that the individuals responsible for the Company's Internal Auditing Board, as well as its Compliance and Internal Controls, Personnel Management and Legal departments, also provide the Committee with operational support.

Consequences for cases in which irregularities are proven to exist through means of investigations are provided for in EDP Brasil's List of Consequences.

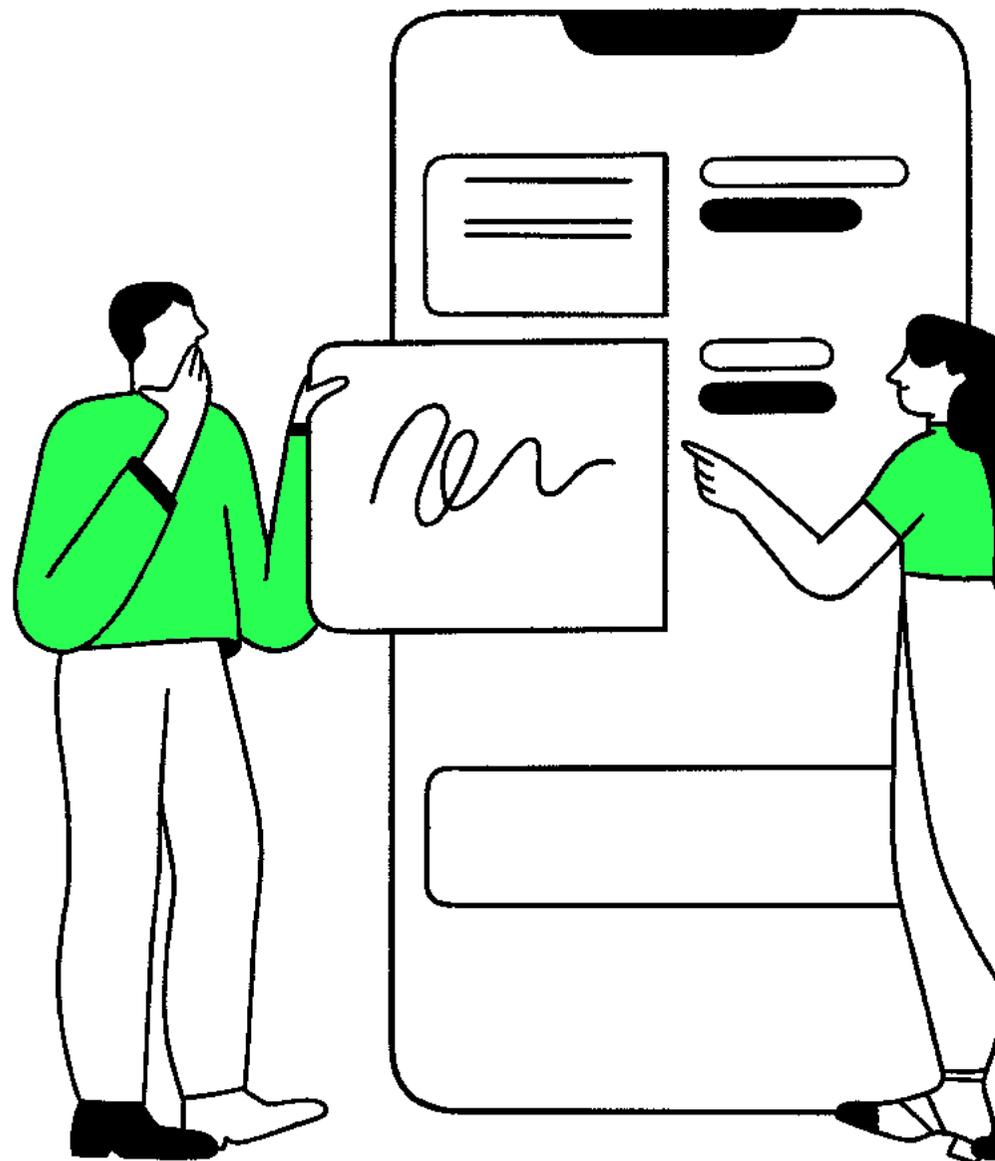
All employees have a duty to report situations of which they become aware or may become aware, that violate EDP's Code of Ethics, the company's remaining regulatory instruments and/or applicable legislation. In any case, the company does not tolerate any kind of retaliation for complaints that are filed in good faith.

**Disclosure of information regarding contact carried out through the Corporate Speak Up Channel**

EDP Brasil discloses general information regarding the reports that it has received through the Corporate Speak Up Channel on a quarterly basis. This information is published through the Company's internal means of communication.

**Conflict of interest**

If the Internal Auditing Board decides that a certain report filed through the Corporate Speak Up Channel presents a conflict of interest involving any of the members of the Ethics Committee, the situation must be brought before the Ethics Committee's President, who, in circumstances in which a conflict of interest is found to exist, will designate an ad hoc substitute for the case in question.



# Glossary

## Stakeholder Definitions

### **EDP, the EDP Group or the Company:**

Any company that are controlled by EDP Energias de Portugal S.A., regardless of whether their headquarters are located in Portugal or overseas.

**Stakeholders:** Individuals, entities or groups that may affect or be affected by EDP's activities, products or services and associated performance, including, but not limited to, employees, shareholders, clients, suppliers, counterparties, business partners, competitors, public and regulatory authorities, patrons, and local communities<sup>i</sup>.

**Shareholders:** Foreign or locally-based individuals or legal entities that hold shares from EDP, S.A., EDP Energias do Brasil, S.A. or EDP Renováveis, S.A..

**Clients:** Individuals or legal entities to which EDP provides services or sells products, both on a regulated basis and within open markets<sup>i</sup>.

**Collaborator:** Individual hired by any of the companies belonging to the EDP Group, whether through means of collective bargaining or as part of management positions or mandates, on a permanent or temporary basis, or as an intern<sup>ii</sup>.

**Communities:** Organizations, institutions and entities that are part of civil society and which represent citizenship-based interests, clients, business segments, media, research institutes, and organizations promoting social development<sup>iii</sup>.

**Competition:** Situation in which independent companies sell similar products or services and compete with one another in terms of prices, quality and services, for example, in order to attract customers<sup>iv</sup>.

**Suppliers:** Individuals or legal entities offering products or services to EDP. Includes service providers<sup>i</sup>.

## Other Definitions

**Environment:** Natural surroundings in which an organization operates, including air, water, soil, natural resources, flora, fauna, people, outdoor spaces and their respective interrelationships<sup>v</sup>.

**Money Laundering:** Conduct involving the conversion, transfer or, assisting or facilitating any conversion or transfer of advantages obtained by an entity or through third parties, whether directly or indirectly, in order to conceal their illicit origin, or to prevent individuals participating in or committing these violations from being criminally charged or subject to criminal investigations<sup>ii</sup>.

**Supply Chain:** Sequence of activities or partners that provide an organization with products or services<sup>v</sup>.

**Contributions to Political Parties:**

Contributions or association with political parties, candidates, campaign structures/political candidacies or related persons or entities involving the delivery of goods or provision of services, whether directly or indirectly, which cannot be made on EDP's behalf or by representatives of EDP.

**Corruption and Bribery:** Illicit act involving passive/active corruption within the private/public sector in which an individual, either themselves or through an intermediary upon their providing consent or approval, provides or promises, requests or accepts, either for themselves or on behalf of a third party, an undue economic or non-economic advantage, or the promise of any act or omission that constitutes a violation of their professional duties<sup>ii</sup>.

**Whistleblower:** An individual who reports or publicly discloses an infringement on the basis of information obtained in the course of their professional activities, regardless of the nature of such activities and the sector in which they are carried out. The following individuals may be considered whistleblowers:

- a) Employees in the private, social or public sector;
- b) Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction;

- c) Shareholders and persons belonging to administrative or management bodies or supervisory boards at legal entities, including those that are not executive-level employees;
- d) Volunteers and interns, whether remunerated or not<sup>vi</sup>.

**Sustainable Development:**

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

**Donations and Sponsorship:** The allocation of financial and human resources or assets to an entity, person or event promoted by an external entity, with the objective of developing certain social, cultural, and promotional initiatives, among others<sup>ii</sup>.

**Business ecosystems:** Network of organizations – including suppliers, distributors, clients, competitors, government agencies, etc. – involved in the delivery of a specific product or service through means of competition and cooperation. Each entity present in the ecosystem affects and is affected by the remaining members, which in turns creates a relationship that is constantly evolving and in which flexibility and adaptability are determining characteristics.

**Extended enterprise:** A company that carries out its business activities while relying not only on the provision of work and the knowledge of its employees, but also on the active collaboration of suppliers and partners in general, which are required, in turn, to assume various commitments that include respect for the Company's Code of Ethics, Code of Supplier Conduct, and remaining Policies and Codes of Conduct implemented by the various business units that belong to the parent company.

**Entrepreneurship:** Activities that involve the discovery, evaluation and exploitation of opportunities used to introduce new assets and services, forms of organization, markets, processes and raw materials through the organization of efforts that did not previously exist<sup>viii</sup>.

**Equity:** the notion of offering fair treatment and equal access to opportunities within an organization or system and efforts made to identify and eliminate inequalities and barriers<sup>ix</sup>.

**Rule of Law:** Legal and political systems, structures and practices, which condition a government's actions in protecting citizens' rights and freedoms, maintaining law and order, and encouraging the efficient functioning of a nation<sup>v</sup>.

**Family or family relationships:**

Spouse or common law partner, their ascendants, descendants and related individuals up to the 3<sup>rd</sup> degree of consanguinity along a collateral line<sup>ii</sup>.

**Confidential and sensitive information:**

Information and documentation regarding the Company's general activities that are not made available to the public and include information on business activities, research and development, clients, stakeholders and employees.

**Integrity:** Behaviors and actions that are consistent with a series of moral or ethical principles and standards of conduct, adopted by both individuals and institutions, that offer a barrier against corruption<sup>v</sup>.

**Equity:** Multiple diversified resources, whether tangible or intangible in nature, belonging to companies or third parties that have entrusted EDP with such assets, examples of which include: Company money; Company products; computer systems and software; telephones; photocopiers; Company vehicles; working hours for employees and the fruits of their work; tickets for presentations or sporting events; patented information; Company trademarks.

**Precautionary Principle:** Moral and political principle that determines that, if an action can cause irreversible public or environmental damage, in

the absence of an irrefutable scientific consensus, the burden of proof is on the side of those who intend to practice the act or action that may cause the damage. Its application in the area of the environment is mainly used to prevent potentially harmful and irrecoverable effects resulting from actions that must not be taken, although they may not be scientifically and empirically proven to implicitly cause such damage, as a matter of precaution, with no evidence of negative impacts.

**Retaliation:** act or omission that directly or indirectly takes place within a professional context and is motivated by an internal or external complaint or public disclosure that causes or may cause unjustified damage to the whistleblower, pecuniary losses or pain and suffering<sup>ii</sup>.

**International sanctions:** Restrictive measures adopted by countries, regional governments or international organizations in accordance with a given international policy and, as a rule, are aimed at ensuring safety. Sanctions may be of a commercial, economic or financial nature and may affect other countries, specific individuals, institutions, entities or certain goods and services<sup>x</sup>.

**Transparency:** Openness with regards to decisions and activities that affect society, the economy and the environment and a willingness to ensure that such decisions are communicated in a clear, precise, timely, honest, and comprehensive manner<sup>v</sup>.

<sup>i</sup> EDP's Code of Ethics; 2013  
<sup>ii</sup> EDP Integrity Policy; 2018  
<sup>iii</sup> EDP Brasil's Code of Ethics; 2018  
<sup>iv</sup> European Commission, EU Competition and Consumer Policy  
<sup>v</sup> NP ISO 26000 Social Responsibility Guidelines  
<sup>vi</sup> Federal Law no. 93/2021 which establishes a general regime for the protection of whistleblowers | [Federal Law no. 93/2021 | DRE](#)  
<sup>vii</sup> Report of the World Commission on Environment and Development: Our Common Future, United Nations  
<sup>viii</sup> Scott Shane, 2003  
<sup>ix</sup> DEIP Policy | Diversity, Equity, Inclusion and Sense of Belonging at the EDP Group, 2022  
<sup>x</sup> EDP Group's Integrity Policy; 2022

Code of Ethics

# Our Energy

