

EDP Brazil  
Code of Ethics

# OUR ENERGY

*edp*

## 1. Personnel in charge

**Preparation:** Ethics Ombudsperson's office (EEO).

**Approval:** General and Supervisory Board (GSC) in September 2020.

**Adaptation:** EDP Brazil's Compliance Team

## 2. Review and update

EDP Brazil's Code of Ethics was revised in 2020 for compliance team. It will be reviewed every two years and may be subject to extraordinary revisions, without prejudice.

## 3. Dissemination

The Code of Ethics is published on the institutional websites of the various companies of the EDP Group and made available on-line in the respective internal networks.

In case of any discrepancy in the interpretation between the present text in Portuguese and the respective translation in another language, the spirit of the original text written in Portuguese shall prevail.



## OUR IDENTITY AND MAIN ETHICAL COMMITMENTS

## LEADING WITH RESPONSIBILITY

## A CODE FOR ALL... WHICH GUIDES AND HOLDS US ACCOUNTABLE

## WE GIVE EVERYONE A VOICE

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# Our identity and main ethical commitments

EDP is a global energy company, focused on creating value, innovation and sustainability, which operates a business based on a commitment to excellence, serving its stakeholders and making a decisive contribution to a responsible energy transition. One of its most valuable assets is its reputation, which is why the Company is committed to carrying out all its activities ethically in the different markets it operates in, acting on principles that derive from its identity.

EDP's main traits of identity and its affirmation of **ethical commitment** thus materialise in a company...



...which is **People-centred**, fostering a culture of respect and full attention to the development of each employee, in particular through lifelong learning, by promoting diversity and well-being as well as respecting merit and equal opportunities for all.



...which promotes and exercises **relationships of Trust** with its stakeholders, striving to continuously improve economic and social results, sharing value with Employees, Shareholders, Customers and Suppliers, while respecting the competition, and combining social and environmental responsibility concerns, particularly in the communities where it operates.



...which consistently works to play a decisive role in the far-reaching **Transformation of the energy sector** which is underway, committing to a fair, innovative and creative energy transition, supported by the responsible use of technology.



...which maintains a strong commitment to **Integrity**, ensuring compliance with the laws and regulations applicable in all the regions in which it is present and maintaining internal control systems in the prevention and detection of fraud and other irregularities.

The EDP Code of Ethics mirrors what we believe in and what we promise to deliver. **It is, in fact, "our energy"!**

# Leading with responsibility



**Ethics is a fundamental pillar of human activity and, therefore, of business activities.** In companies, we are all assigned the role of bringing Ethics to life in every act of daily life. However, leaders have an essential mission - it is they who lead teams, who empower them with competence, guidance and inspiration - thus standing out as one of the main promoters and broadcasters of ethical culture.

This means that it is up to the leaders, as one of their most important responsibilities, to know and disclose the ethical principles and commitments of their company, to define and implement initiatives that promote a culture of ethics, and to set the best example for their employees.



And that is why leadership based on trust is decisive: leaders must be the “first line of defence” to advise and support their employees when they have doubts or questions regarding behaviour.

**It is also the leaders who, due to their duties, face the resolution of the most difficult and complex situations, where, at times, courageous and not always obvious choices have to be made;** they must, therefore, have the Company’s ethical guidelines completely internalised and consider these in the decision-making process to find the solutions that best comply.



At EDP, the members of the governing bodies, as well as those responsible for the various functions that make up **the EDP world, ensure, as leaders, the maintenance and strengthening of the identity of the companies and areas in which they work and, to this extent, ensure with their performance the ethical orientation** underlying that identity. Their role is, therefore, decisive, which is recognized in the “Code of Conduct for Top Management and Senior Financial Officers”, which sets out a wide range of specific commitments since “the example of their activity is the best and most powerful code of conduct that the organization can have and the best safeguard of the Company’s reputation”.

# A Code for everyone...

The EDP Code of Ethics applies, regardless of function, geographical location or functional reporting, to all employees of all EDP companies, as well as to all employees of the EDP Foundation, *Fundación EDP* and EDP Institute, hereinafter also referred to as "EDP".



## **This Code must be read, understood and observed by all.**

The employee commitments laid down in this Code are, *mutatis mutandis*, also applicable to proxies, as well as to agents and suppliers who are, in any way, entitled to act on behalf of EDP.

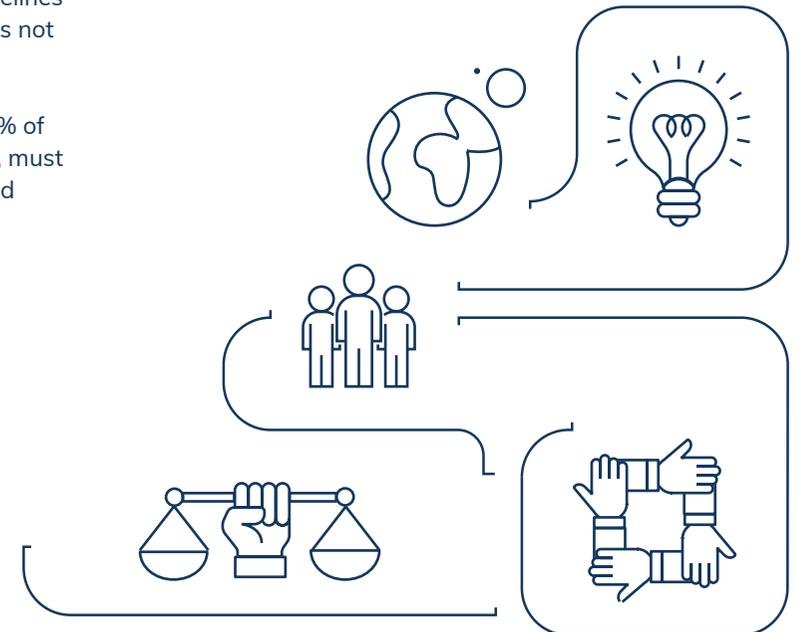
Other suppliers are explicitly required to abide by this Code, in accordance with the obligations arising from qualification procedures or established contracts.

Due to legal or regulatory requirements, as well as the circumstances of the operation, the existence of specific codes of ethics as well as regulations, procedures or guidelines on ethical matters may be justified in EDP's various organisational units. In such cases, the guidelines of this Code will be observed in everything that does not arise from the applicable official regulations.

Corporate bodies in which EDP holds more than 50% of the voting rights, or which it has the right to control, must adhere to the EDP Code of Ethics and non-controlled subsidiaries are encouraged to do so.

As a vertically integrated global utility, EDP has a significant presence on the world energy scene, operating in several countries with over 10,000 employees. The Portuguese text of this Code is the reference document, it being available in the other working languages in force.

We respect and comply with all legal and regulatory rules in the jurisdictions that apply to EDP, taking the principle of the highest requirement as a reference.



# ...which guides and holds us accountable

The Code of Ethics is an “action guide” reflecting the way EDP believes one should work, therefore its enforcement is inevitably mandatory; it is therefore only natural that employees who do not comply with this Code should be subject to disciplinary action, under the terms of the regulations applicable to infringements. Suppliers to whom the Code is applicable will also be subject, in the event of non-compliance, to the measures or sanctions contractually established or arising from the assessment and qualification procedures in force at EDP.

The Code is a privileged tool that frames the reflection on Ethics, but it is essentially a means of supporting the resolution of ethical issues, since it presents standards and norms of behaviour that help sustain our decisions. It does not override the law and regulations – which must always be fully and scrupulously complied with – but rather complements them by supporting responsible decision making, with arguments that help us to resist possible pressures, particularly when we face situations which lie in “grey areas”.

Nor does the Code replace the existing Policies, Procedures and other internal documentation in each specific area of EDP’s activity, but it is, in general, a good rationale for supporting them.

On the other hand, the Code does not cover all situations that may arise for decision making that is expected to be of an ethical nature. It does not provide us with all the answers, nor is it supposed to, and cannot replace the cautious judgment and common sense of all those who works in the Company. The Code is a guide that, by indicating particular ways of choosing and acting, aims to help us understand sensitive or less common situations and to reject unacceptable practices, regardless of the context and the perception of other people.

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



**Stop to think** whether the situation in question does in fact constitute a violation of the Code and in what way it can be addressed.



**Cautiously reflect** on whether the approach identified is consistent with maintaining the culture of integrity, transparency and reliability that EDP promotes and what kind of consequences it can have.



**Ask questions and ask for help** from the management or other responsible persons or, if necessary, from the Compliance area. In this Code, under “We give everyone a voice”, the channels to which we can turn are mentioned.



**The Code of Ethics must always be present in our daily lives**, constituting a firm reference for our actions as people and as professionals. This presence must be assured, namely, through continuous training actions that bring the Code to the constant interpretation of reality and help us to do good well.

# We give everyone a voice

At EDP, we believe that speaking openly about the concerns we have and which relate to the way we act in the workplace is crucial for creating a good environment and for the commitment and training of employees, which is essential to the excellence performance which EDP seeks. This openness in dealing with concerns, grievances or even complaints, must be adopted with all stakeholders, for the sake of a transparent and constructive relationship.



**A frank conversation between the parties contributes decisively to increase the psychological security of people and teams and its effect on the results of the work is, in the case of employees, differentiating.**

However, sometimes this open and frank conversation is not enough, and it is necessary to scale up and report. The reporting of any behaviour which is in conflict with the Code of Ethics is essential as it allows for the clarification of any operational doubts and the consolidation of a culture of integrity, transparency and trust which is essential in a healthy Company.

**It is important that reporting is honest**, understandable, timely and made in “good faith”, since a claim of “bad faith” or of slanderous nature will not be accepted and may be a disciplinary infringement under and for the applicable legal and regulatory purposes.

EDP, for its part, undertakes to ensure a robust process for managing contacts received of any possible ethical nature and prohibits any act of retaliation against those who complain. The confidentiality of the contact received is also ensured, provided that this does not prejudice the ascertainment of the truth of the facts in question.

**It is desirable that the concern**, request for information or complaint, in the case of employees, can be resolved by, or through, their hierarchy. Leaders have a special responsibility to listen to these concerns and to act subsequently and this is a path that reinforces trust within their teams.

When this is not possible, the appropriate channel for most complaints is the Ethics Channel. Since 2019, communications to the Ethics Channel have been received by a third party, ensuring even more impartiality in the process. Subsequently, it is analyzed by a specific internal team and penalties are determined by our Ethics Committee for non-compliances confirmed in the investigation, according to the subject reported.

EDP’s process of managing complaints generally involves the Ethics Committees of the different regions.

**This process can be found in detail in the chapter “Find out.”.**

It is essential that EDP employees or other stakeholders trust that, throughout the process, the issues they raise are treated with utmost seriousness, fairness and promptness, and that, whenever appropriate, measures are taken that are adjusted to the type and seriousness of the process, incorporating the final decision document.

 We give everyone a voice

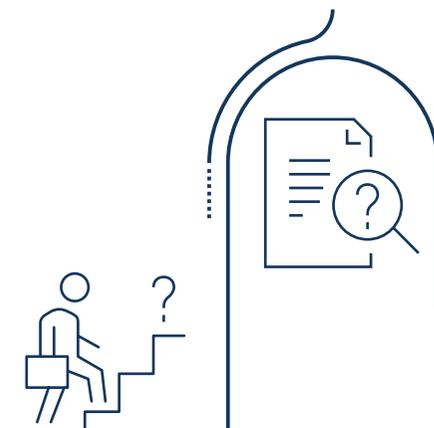
## EDP Brazil Ethics Channel Contacts

**Website:** <https://www.edp.com.br/canal-de-etica-edp>

**Email:** [edpBrasil@canaldeetica.com.br](mailto:edpBrasil@canaldeetica.com.br)

**Phone:** 0800-591-0982

**Post Office:** Caixa Postal nº 521 – ICTS – CEP 06320-971  
Barueri – SP



# Let's make the way for OUR ENERGY

The Code of Ethics is based on EDP's identity. **We mark this identity in four "traits"** that comprise the way in which things are done in the Company. Each of these "traits" contains the topics that are highly relevant for EDP, and on each one we talk about the reason for its choice and the behaviour to be followed, or not, in order to ensure consistency of action throughout the organisation.

We illustrate some of these behaviours with real life situations in the Company, because after all, Ethics is nothing more than action. The behaviours and examples mentioned are obviously not exhaustive, but represent the essence of the way in which we want to work and be recognized by all stakeholders.





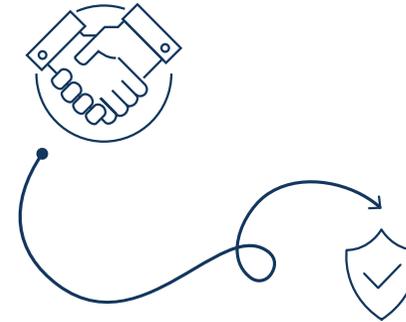
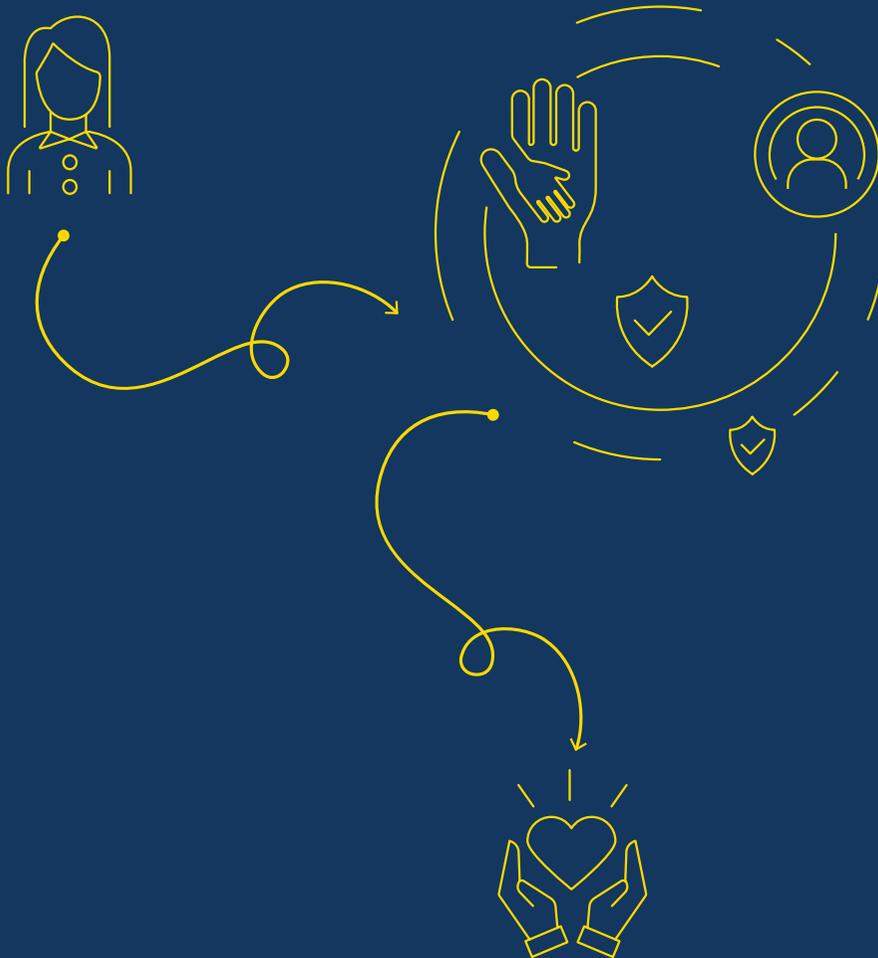
A COMPANY  
FOCUSED  
ON PEOPLE



## A COMPANY FOCUSED ON PEOPLE

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

# 1.1 Employee Well-being



Commitment to the well-being of employees is essential for EDP, which embodies this through management policies that aim **to provide high levels of satisfaction and professional fulfilment**, particularly through ensuring fair wages, and a safe and healthy working environment.

In this sense, and in addition to strict compliance with national and international labour legislation, and the firm protection of employees' privacy, EDP seeks to maintain an **excellent social climate** through the implementation of various mechanisms, such as the ongoing and diversified development of skills, the use of remote work as long as feasible, the promotion of mobility, support in balancing both professional and personal life as well as voluntary work, the encouragement of sport and leisure activities, and the creation and maintenance of suitable and collaborative work spaces, among others.

Given that well-being is an indispensable condition for harmonious functioning, both economically and socially, EDP ensures policies and practices that involve everyone, without exception, so that **everyone can feel part of the whole that is their company**. It is also important to bear in mind that it is up to us all and, in particular to each and every one of us, to **find ways of living our values at work and building good relationships and a good environment in the workplace** with leaders having a special duty in creating an atmosphere in which people can thrive.

## We must

01



Promote the existence of a sense of purpose in each activity, in which alignment with individual aims can be established and which makes the importance of what each one does and what their contribution to the whole is, clear.

02



Stimulate, and value individually, personal development, building together an environment of trust, responsibility and mutual respect.

03



Actively seek professional development in order to continuously improve our skills and make best possible use of opportunities afforded by EDP.

04



Invest in the balance between professional and personal life by cooperating in the construction and promotion of related programmes.

05



Value voluntary work, encouraging civic participation.

## We must not

01



Tolerate forms of behaviour, however subtle, which contribute to creating an unhealthy workplace environment.

03



As a leader, to prevent, unjustifiably, mobility processes, participation in EDP training and volunteer actions.

02



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

04



Violate the privacy of employees.

Q:



My manager is sometimes quite intimidating. I know that he/she is striving for us to permanently deliver quality work, but sometimes the pressure is too much. Is there anything I can do about this?

A:

Your manager is expected to challenge and lead the team in order to offer the performance excellence that characterises EDP. This may mean that there are moments of tension. However, it is also expected that a manager treats everyone with respect by acting with due sensitivity. If you feel you are not being treated with respect, try talking to your manager. Should the situation persist, you may turn to the ethics channel. A healthy work environment can only occur with everyone's support and involvement.

## Related documents

- EDP
  - [Internal Mobility Policy – Local and International](#)
  - [Volunteering Policy](#)
  - [Code of Conduct for Top Management and Senior Financial Officers](#)

Q:



A voluntary action has been published in which I would very much like to participate; however, and because we are close to the end of the year and working very hard, my participation in this action may be viewed poorly by my leadership and my colleagues. What should I do?

A:

Professional commitments must always be properly safeguarded. On the other hand, EDP is known to actively support its employees in the practice of social volunteering. Therefore, you should talk to your hierarchy in order to jointly seek the best decision, which can never allow professional responsibilities to be disregarded.

## 1.2 Health and Safety



Occupational health and safety for all employees and suppliers is a priority for EDP.



Occupational health and safety for all employees and suppliers is a priority for EDP, the objective being “zero accidents” and, at the same time, the ongoing concern **to put people’s well-being before any operational need**. No situation or urgency of service can justify endangering someone’s life, physical integrity or safety.

Based on the reinforcement of a **vertically based culture of prevention and safety**, EDP promotes the training and the briefing of all employees on the risks inherent to its activities and protects the facilities and equipment by adopting the best techniques, combined with the monitoring and updating of work procedures. The importance EDP attaches to these issues extends to the supply chain and goes beyond compliance with legal requirements, in all companies and in all regions in which it operates.

The excellence required in this area can only be achieved with the involvement and accountability of all levels of management and the support and contribution of all employees, service providers and other stakeholders.

## We must

01



Ensure that everyone, including suppliers and in particular those who act on our behalf, comply with the safety rules and practices and the labour legislation in force.

02



Ensure, both internally and externally, the continuous strengthening of a safe and healthy working environment, namely through awareness raising, training and the sharing of good practices.

03



Monitor and assess risks and occurrences.

04



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

05



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

06



Get to know the procedures applicable in the event of an emergency.

07



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

## We must not

01



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

02



Disregard the strict fulfilment of health and safety objectives.

**Q:**

From time to time, I have noticed that some of the stipulated procedures were not being followed in an EDP project. The work has nothing to do with me directly. Should I report it?

**A:**

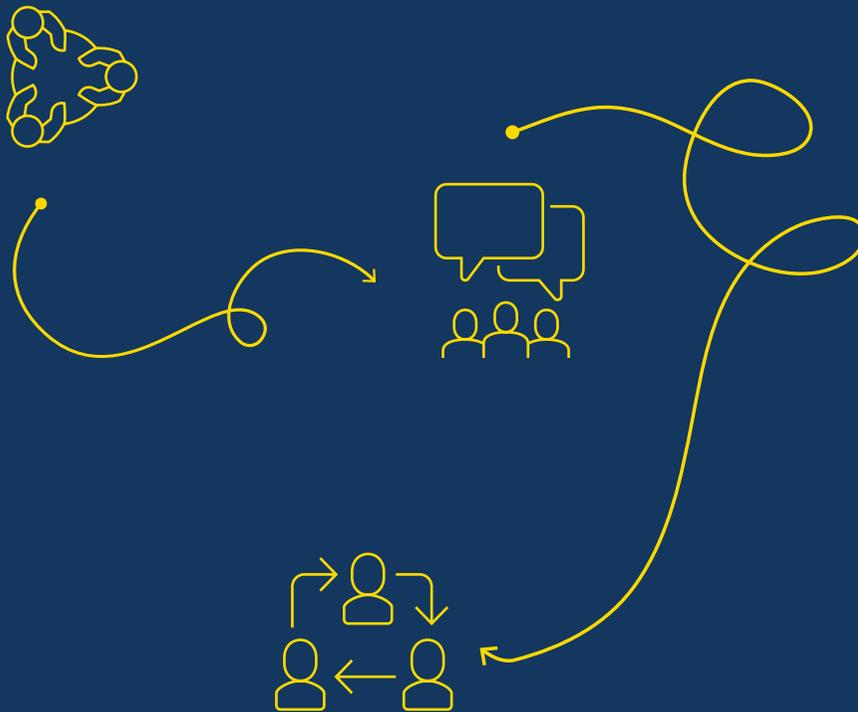
Safeguarding compliance with the applicable procedures (especially those related to legal obligations and health and safety at work), as well as the company's image, concerns everyone, regardless of their area of operation. You should immediately report this using the appropriate channels. In the event of an imminent serious risk, the work must be interrupted immediately by the observer. All EDP employees have the duty and autonomy to interrupt any work carried out by their own teams or service providers when the appropriate safety conditions do not exist.



## Related documents

- EDP
  - [Health and Safety at Work Policy of the EDP Group](#)
  - [EDP Supplier Code of Conduct](#)
  - [EDP Group's Covid-19 Contingency Plan](#)
- EDP Brazil
  - [Occupational Health and Safety Management Procedure for Third Parties](#)
  - [Safety Management Procedure for Service Providers](#)
  - [Safety Governance Procedure](#)
  - [Rules that save lives](#)

## 1.3 Company Representation



The performance of each one of us and the way we communicate, as an employee, proxy holder or service provider empowered to act on behalf of EDP, whether formally or informally, affects the image and reputation of EDP.

It is therefore essential to be aware of the impact of everything we do and say, in either physical or virtual public spaces, especially when the name and activity of the Company is involved, since we are inevitably **EDP's ambassadors**.

New technologies are radically changing the way we communicate, both at the corporate and individual level. Social networks, for example, as digital public spaces, can increase the feeling of belonging and help to create collective knowledge. However, acting and interacting in online communities, sharing information, ideas, interests, personal messages and other content, makes it difficult to dissociate our personal image from the company's image. We are also responsible for representing EDP with pride, **valuing its principles and commitments, particularly on Ethics and Sustainability**.

## We must

01



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

02



Foresee the impact of our statements, particularly outside EDP, always bearing in mind the scope that information can have in the media and in social networks.

03



Not to involve EDP in our personal actions.

04



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

05



Ensure that any communication about EDP has been properly prepared and authorized by the communications area.

06



Provide information to the management of the Communications area about derogatory comments or opinions published in the media and social networks.

## We must not

01



Act beyond our specified competences when carrying out specific assignments in the service of or on behalf of EDP.

02



Undertake public speaking on behalf of EDP, unless duly authorized by the Communications area.

03



React to negative or derogatory content about EDP unless we have been duly informed and authorised to do so.

04



Share internal information on social networks.

05



Use EDP resources, such as email or personalized cards, to express personal opinions or promote private business affairs.

06



Quote co-workers, customers, partners, service providers or other related parties, without their approval.

07



Use the EDP brand for private purposes under no circumstances whatsoever.

**Q:**

In a conversation on media topics among friends, issues were mentioned that jeopardize EDP's reputation. Should I join in this conversation?

**A:**

If you have the knowledge to do so, you should present the company's position on this matter. If you do not have enough information, you should refrain from making comments, stating that EDP acts with integrity. Additionally, you should mention that EDP has its own channels for releasing information as well as for reporting situations that are considered improper.

**Q:**

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

**A:**

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

**Q:**

I came across information with derogatory remarks about EDP on social networks. What is the best thing to do?

**A:**

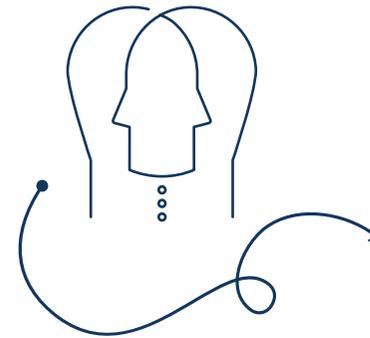
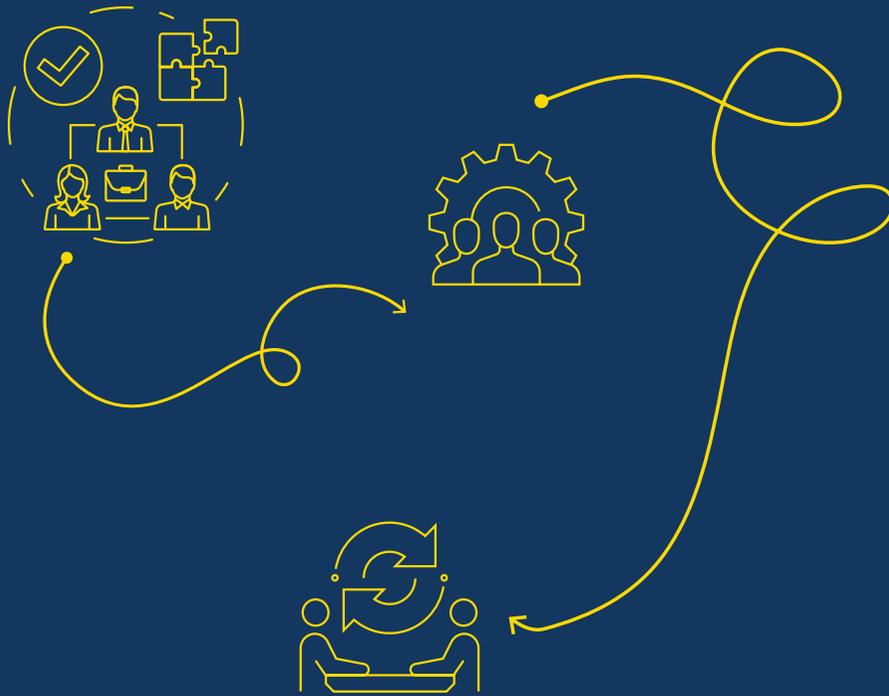
You should immediately inform your hierarchy and the Communications area.



## Related documents

- EDP
  - [Code of Conduct for Top Management and Senior Financial Officers](#)
  - [Social Networks – Principles, Values and Policy](#)
  - [#GetSocial](#)
- EDP Brazil
  - [Information Security Standard](#)
  - [Communication Standard within the scope of the management systems](#)
  - [Compliance Standard](#)
  - [Brand and Communication Standard](#)
  - [Standard for Interactions with Public Officials](#)

## 1.4 Diversity and Inclusion



Today EDP has a global presence, integrating diverse people all over the world. We value and promote this diversity as a factor creating value and innovation.

We recognize that multiplying differences is to go further, to bring together points of view and ways of seeing the world, to integrate all aspects, to be consciously inclusive, particularly by means of profiles, paths and experiences that bring value and enable us to do what we have to do best.

We actively seek not to be influenced by any bias, conscious or unconscious, and we take steps to **enhance an inclusive culture that makes everyone feel welcome.**

**We foster diversity and inclusion by ensuring equal opportunities** as an employer, which we also encourage in our suppliers.

## We must

01

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



02

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



03

Encourage the inclusion of all expressions of human diversity.



04

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



## We must not

01

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



02

Discriminate, neither in the recruitment process or at any other time in the relationship between employees and the company, such as training, professional development, recognition and mobility within and between companies, among others.



**Q:**

A colleague with a mobility impairment has recently joined my team. I naturally understand their problem, but their productivity is lower and at the end of the day this is reflected in the team's results. What can I do?

**A:**

You should talk to your manager and explain your concerns to them. At EDP there is room for everyone, but if your colleague has been assigned goals or duties that they cannot meet due to their physical condition, it will not be good for either them or the team. Together they will be able to assess the situation and, if necessary, find a more suitable alternative solution.

**Q:**

I often get prejudiced and sexist comments from a colleague, which naturally makes me rather uncomfortable. What should I do?

**A:**

First of all, you should talk to your colleague and explain to him how you feel. If he persists in this attitude, you can talk to your hierarchical superior and alert them to the situation. If there is still no change, you should report the case through the appropriate channels.

**Q:**

I am about to take maternity leave and I am worried about what will happen when I return, notably about my future career opportunities. Who should I go to for advice?

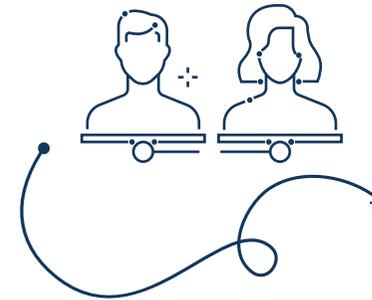
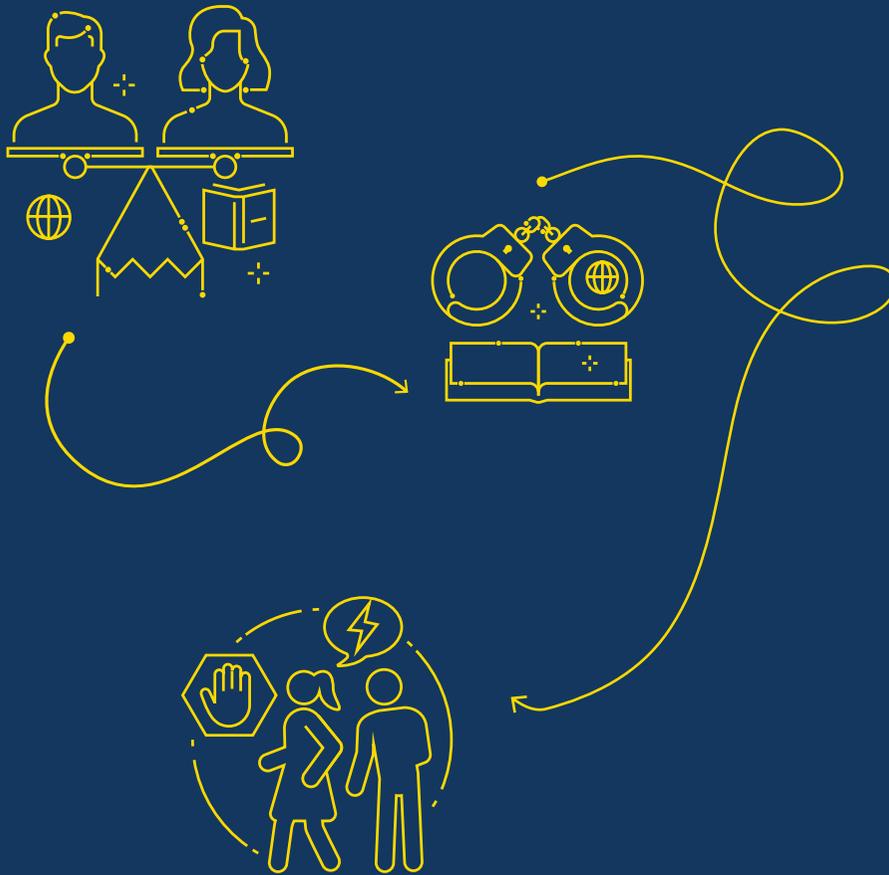
**A:**

EDP supports employees at the end of their maternity and paternity leave, ensuring that they resume the activity for which they were hired for. Any questions or concerns on this subject may be addressed with your line management or with the HR departments in your sector.

## Related documents

- EDP
  - [EDP Diversity Policy](#)
  - [2020-2021 Gender Equality Plan](#)
- EDP Brazil
  - [Human Development Policy](#)
  - [Human Rights Standard](#)
  - [Brand and Communication Standard](#)
  - [Compliance Standard](#)

# 1.5 Harassment



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

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

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

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

## We must

01

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



03

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



02

Prevent and combat harassment at work.



04

Promote awareness actions on the subject.



## We must not

01

Tolerate any form of behaviour involving moral harassment, such as: systematically devaluing the work of co-workers or employees; promoting the social isolation of co-workers or employees; constantly ridiculing, directly or indirectly, a physical or psychological characteristic of co-workers or employees; establishing goals and objectives that are impossible to achieve or deadlines that are not feasible; assigning inappropriate functions to the professional category of employees; unjustifiably not assigning certain functions to employees; taking ownership of ideas, proposals, projects or work from co-workers or employees.



02

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



03

Retaliate against plaintiffs or witnesses of harassing behaviour.



**Q:**



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

**A:**

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

**Q:**



A colleague told me that they were harassed by another colleague. I advised them to make a complaint, but I know they haven't done this. Can I do it myself?

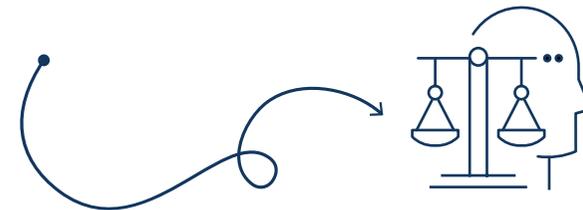
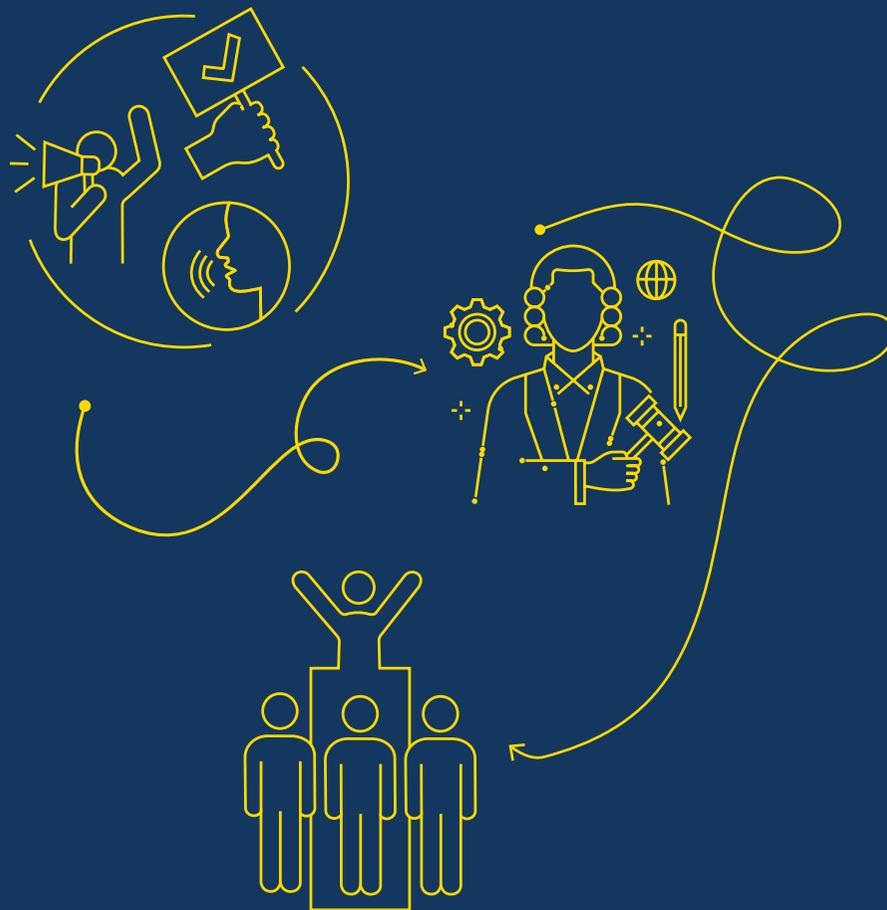
**A:**

In advising your co-worker to report this you took the first correct step. If you believe that this is actually a case of moral harassment, you can do it yourself through the appropriate channels.

## Related documents

- EDP
  - [Code of Conduct for Top Management and Senior Financial Officers](#)
- EDP Brazil
  - [Human Rights Standard](#)
  - [Balancing Consequences](#)
  - [Inclusion and Diversity Program](#)

# 1.6 Human Rights



EDP respects and undertakes to promote Human Rights internally, in its suppliers, customers and the communities where it operates, namely in indigenous communities, by guiding its actions according to the Universal Declaration of Human Rights and international conventions, treaties or initiatives, such as the Conventions of the International Labour Organisation, the United Nations Global Compact and the Human Rights Council's Guiding Principles for Companies.

In particular, EDP is against arbitrary detention, torture or execution and the sexual exploitation of children and adolescents; in favour of freedom of conscience, religion, organisation, association, namely trade union, opinion and expression; it respects the principles relating to the **safeguarding of human life, physical and mental integrity, health and safety at work, equality and**

**non-discrimination, fair wages and the prohibition of child, youth and forced labour; it also recognises the right to collective bargaining.**

The principle of applying Human Rights in all decisions, including investment decisions, is visible in the commitment to full respect for Human Rights reaffirmed by EDP's Executive Board of Directors in 2019, the year in which it subscribed to the "CEO's Guide concerning Human Rights" of the World Business Council for Sustainable Development. The action points in this guide, in particular, involve knowing the most relevant Human Rights for EDP, leading from the top, engaging with stakeholders in a transparent manner and collaborating beyond its comfort zone.

## We must

01



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

02



Ensure the commitments freely undertaken in all areas of EDP's intervention, regardless of the level of requirement of national and local legislation.

03



Ensure compliance with the commitments assumed in EDP's "Declaration of respect for Human and Labour Rights", maintaining a Human and Labour Rights Monitoring Programme to identify risks and to act in order to avoid, minimise or repair any negative impacts arising from the Company's business and activities.

## We must not

01



Participate in or consent, actively or passively, by action or omission, to practices that may constitute any violation of Human Rights, reporting it whenever this happens.

02



Accept any forms, no matter how subtle, of Human Rights violations by third parties who supply us with products or provide us services.

03



Employ child, youth or forced labour, or engage in such practices by third parties who provide us with products or services.

**Q:**



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

**A:**

No. You should report it so that consideration can be given to opening an investigation proceeding where information can be requested from the service provider and a new audit can be carried out, seeking to eliminate any suspicion.

**Q:**



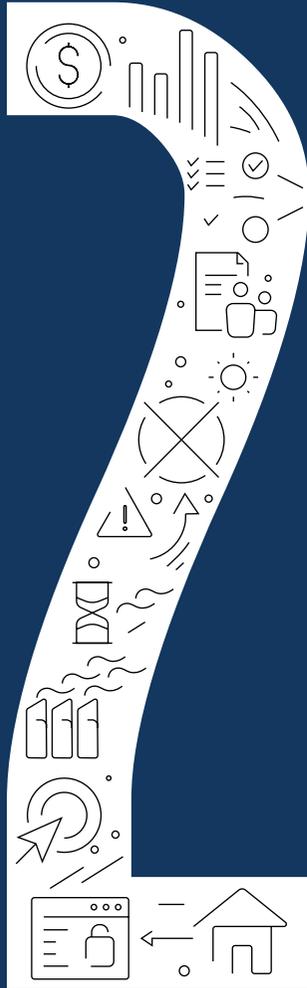
I have received an invitation to be part of an EDP workers' committee, however I am afraid that in doing so I may be harmed in some way because I am not sure that this activity is well regarded among my peers and my manager. Should I accept the invitation?

**A:**

Yes, you should accept the invitation if you wish to. EDP is in favour of freedom of expression and association, always bearing in mind that this type of structure serves the interests of all employees, taking the concerns of all to decision-makers and is therefore a commendable activity of interest.

## Related documents

- EDP
  - [Declaration of respect for Human and Labour Rights](#)
  - [Health and Safety at Work Policy of the EDP Group](#)
  - [EDP Supplier Code of Conduct](#)
  - [Code of Conduct for Top Management and Senior Financial Officers](#)
- EDP Brazil
  - [Human Rights Standard](#)
  - [Compliance Standard](#)
  - [Human Development Policy](#)



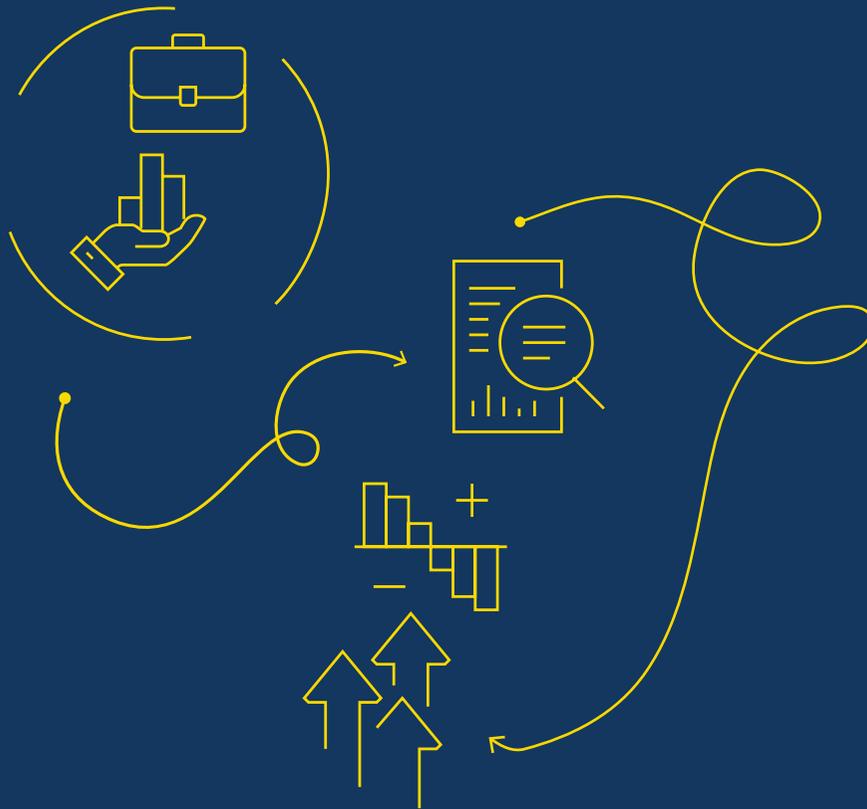
# RELATIONSHIPS OF TRUST



## RELATIONSHIPS OF TRUST

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

## 2.1 Relationship with Shareholders



EDP is committed to creating value for its shareholders.

The “shareholder value” is supported by **strategic decisions that influence the sustainability of the various businesses of the company**, the excellence of execution and the delivery of solid results according to plan.

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

The focus on “**leading an electric future**” is currently a new challenge that the Company once again embraces in anticipation, and which will enable it to continue to **ensure sustainable and distinctive business in the energy sector**.

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

# We must

01



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

02



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

03



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

04



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

05



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

06



Systematically be aware of the expected economic performance of our areas of activity, actively seeking to contribute to achieving the goals set.

# We must not

01



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

02



Stop challenging the adopted practices, always in a constructive context and given that it is of crucial importance to promote efficiency.

**Q:**

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

**A:**

Any new investment option should be carefully considered. It must always be ensured that all risks, which can be discerned at the time of decision making, are analysed and taken into account. If you are unable to respond within the set time frame, you should provide all the information and analysis you have available, warning transparently that it has not been possible to complete the analysis process.

**Q:**

When analysing a potential EDP partner in a new deal, my team's study took into account several risk criteria, particularly financial aspects and profitability. Should I also ensure the ethical assessment and integrity of the elements which make up the future partner management team if the deal goes ahead?

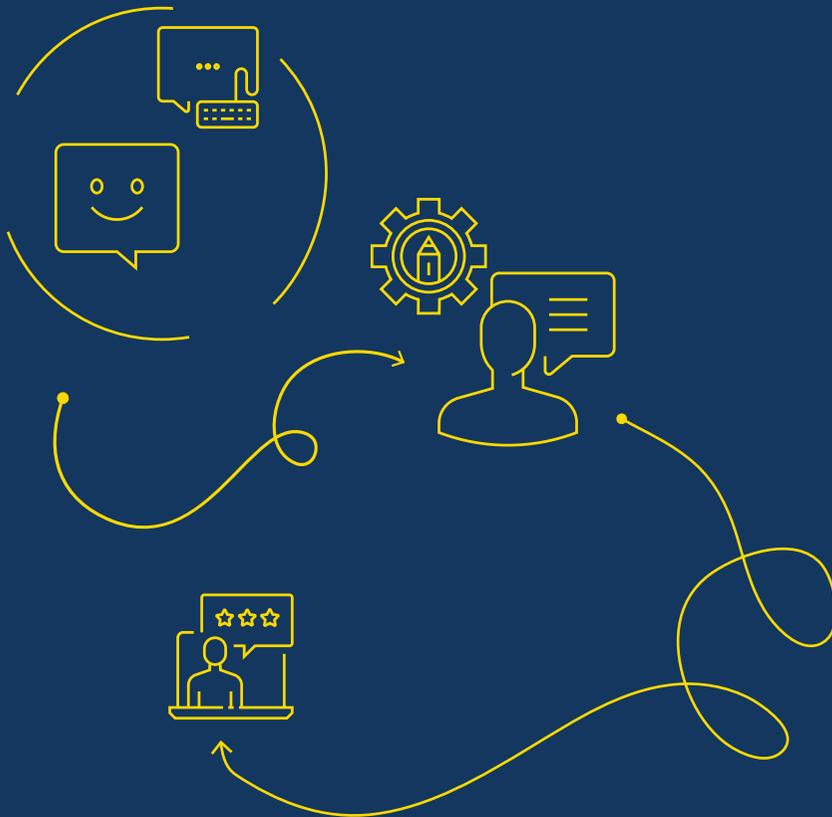
**A:**

Yes, and indeed EDP already takes this analytical aspect into account. The risk analysis of the partnership from the perspective of ethics and integrity is essential, so that any new relationship with third parties does not compromise EDP's reputation from any point of view. Economic Performance robustness is also based on the pillar of Ethics and integrity in business.

## Related documents

- EDP
  - [Code of Conduct for Top Management and Senior Financial Officers](#)
  - [Stakeholder relationship policy](#)
  - [Sustainable Development Principles](#)
  - [Financial Management Policy](#)
- EDP Brazil
  - [Standard for Combating Illicit Acts](#)
  - [Compliance Standard](#)

## 2.2 Relationship with Customers



EDP is a customer-focused company, which understands its specific and changing expectations and acts in a constant search to create solutions that guarantee their satisfaction, particularly through close relationships and a strong ability to listen. **Customer satisfaction translates into greater loyalty and a better relationship with the Company**, which contribute to the growth of turnover and results.

This logic of management based on “customer-value” presupposes the undertaking of commitments by the Company in terms of establishing fair prices, clear and reliable communication of information concerning the characteristics and advantages of the solutions being sold, and the provision of a high quality service based on robust operations, among others.

In addition, taking into account the demanding regulatory context of the sector, EDP has, whenever necessary, implemented mechanisms that ensure the scrupulous fulfilment of the duties to which it is obliged, that is, a universal public service, for economically vulnerable customers, of information transparency, of separation of “regulated” and “free” activities, among others.

# We must



**01**  
Produce and present honest, transparent commercial proposals adapted to the needs of current and potential customers.



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



**03**  
Provide relevant, truthful and accurate information, in plain language and adapted to their needs, through responding to requests, doubts and complaints.



**04**  
Act with correctness, courtesy and professional pride in relations with customers, respecting their rights, sensibilities and diversity.



**05**  
Promote ongoing improvement in our performance, as well as the quality of the products and services we provide.



**06**  
Promote the adoption of responsible behaviour by customers, and consumers in general, which has a positive impact on the environment and society.



**07**  
Set up and maintain simple and effective contact channels.

# We must not



**01**  
Under any circumstances disregard the protection of our customers' personal data, namely through not collecting information for marketing purposes without their express consent to do so.



**02**  
Exploit our customers' lack of knowledge or vulnerabilities to promote new products and services.



**03**  
Include derogatory messages in formal and informal communication regarding our competitors and their products and services.



**04**  
Use stereotypes which diminish human dignity in advertising and marketing campaigns.

**Q:**

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

**A:**

You should promote the characteristics of the product, in a very clear manner and ensure that the customer makes an informed and impartial decision about which is the best solution. Using clear and plain language you are helping to reinforce the company's good reputation.

**Q:**

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

**A:**

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

**Q:**

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

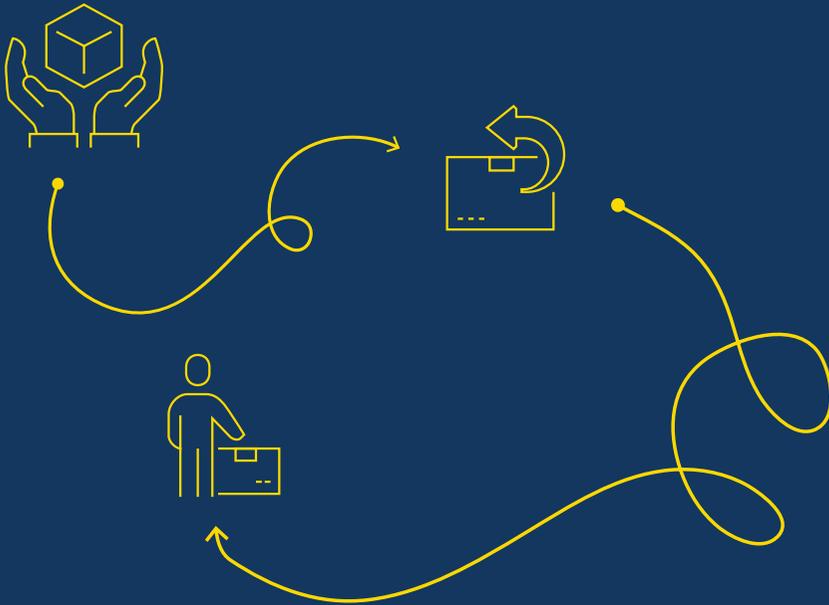
**A:**

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

## Related documents

- EDP
  - [Stakeholder relationship Policy](#)
  - [EDP's Integrity Policy](#)

## 2.3 Relationship with Suppliers



EDP, as an “extended” company, currently incorporates a set of partners, with whom it works and shares responsibilities, who act and speak on our behalf with customers, citizens and other stakeholders.

**Maintaining relations of trust** with these companies is fundamental to EDP’s success. The success of the partnerships we build depends on how we choose them and the commitment we all show in strengthening such relationships.

Our relationships with suppliers are based on **criteria of impartiality, fairness and loyalty** and we respect their independence and identity.

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

# We must

01



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

02



Ensure that suppliers comply with health and safety standards and practices, environmental rules, labour law and Human Rights.

03



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

04



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

05



Ensure that suppliers do not become economically dependent on EDP by taking the necessary preventive measures.

# We must not

01



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

02



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

03



Maintain partnerships with suppliers which do not respect the commitments they made to EDP.

**Q:**

I received a request for the urgent placement of solar panels from a customer. An acquaintance has a company that installs them at competitive prices and is able to guarantee the execution of the work on time. Can I approve this contract to my acquaintance's company without consulting other bidding companies?

**A:**

This is not a correct procedure and disrespects EDP Group rules. Approval without use of a prior tender procedure should only be undertaken in occasional, duly justified situations which have received line management authorisation. In addition, the fact that this company is owned by an acquaintance creates a possible conflict of interests that should not be allowed. You should report this to your line manager, giving all the information you consider relevant and remove yourself from the decision-making process. The new manager responsible for this should assess the effective urgency in terms of not using a prior tendering procedure and check which suppliers are able to respond to the request in order to assign this to the bidder who can offer the best conditions.

**Q:**

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

**A:**

You can explain to the supplier the reasons why their tender was not selected for award, provided that you are authorised to do so. If in doubt, consult your manager.

**Q:**

The employee of a company which wants to bid for a contract renewal process has asked me to provide them with information on the prices their competitors had charged in the previous contract. Getting this contract could be crucial for the viability of that company and they are prepared to lower the price they usually charge to get it. Can I provide this information?

**A:**

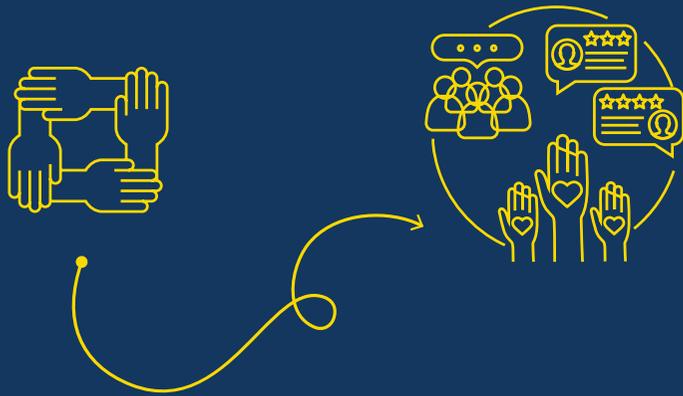
You should not provide this information, unless it is public. None of the bidders should have access to any information that provides them with a business advantage.



## Related documents

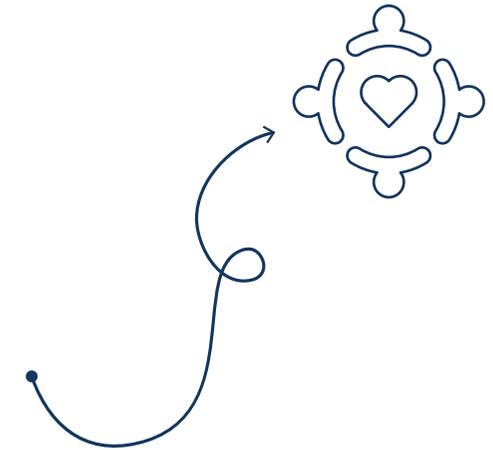
- EDP
  - [Procurement Policy](#)
  - [EDP Supplier Code of Conduct](#)
  - [Sustainability Management in the Supply Chain](#)
  - [Privacy and Personal Data Protection Policy for EDP Suppliers](#)

## 2.4 Relationship with Communities



EDP creates a positive impact on society by valuing not only its employees and partners, but also the communities in which it operates, through respecting their sensitivities and cultures. The **promotion of sustainable development in the regions where we are present and with the communities with whom we interact** is one of the pillars on which our business strategy and our reputation are based.

We have developed a culture of corporate citizenship and involvement with society through **cultural initiatives**, such as promoting access to culture and art and protecting cultural heritage, but also socially, such as promoting social inclusion and the adoption of sustainable lifestyles, valuing energy inclusion and access to energy. We also promote environmental initiatives, such as the protection of natural heritage and biodiversity, but also, and above all, we promote energy efficiency, renewable energy and decarbonisation.



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

# We must

01



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

02



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

03



Promote access to energy for communities isolated from the electricity grids, efficient energy use and the adoption of more sustainable lifestyles.

04



Recognize the rights of ethnic minorities and indigenous peoples where appropriate.

# We must not

01



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

02



Start any intervention without listening to stakeholders to assess possible social impacts and specify any necessary mitigation measures.

Q:



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

A:

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

Q:



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

A:

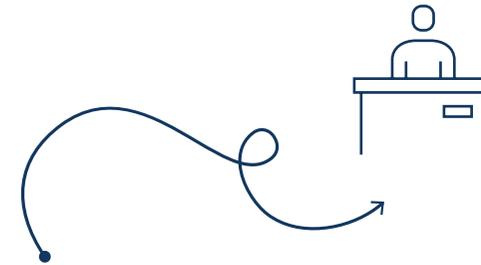
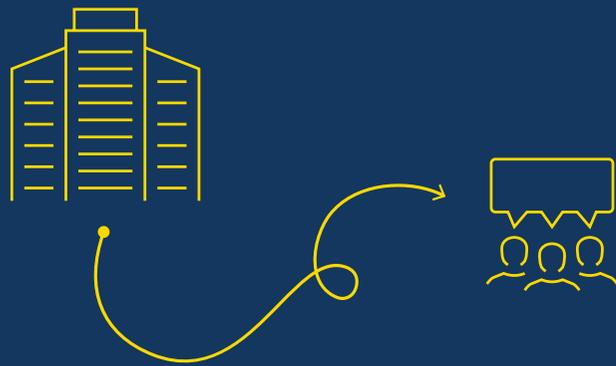
You should check whether the work of that institution fits within EDP's programmes, particularly its policy regarding community relations or its volunteering policy. If this is the case, you should submit this request to your line manager to assess whether there is a possibility of institutionally involving the company in this assistance to the Sport Club.



## Related documents

- EDP
  - [Sustainable Development Principles](#)
  - [EDP Group's Social Investment Policy](#)
  - [Volunteering Policy](#)
  - [EDP Commitment to the Sustainable Development Goals](#)
  - [Stakeholder Relationship Policy](#)

## 2.5 Competition



Nowadays, business development faces very strong competition in various aspects – winning market share, consumers’ choice, innovation, human resources talent, visibility with stakeholders, among others – which requires complete and integral action and complete respect for the stakeholders, particularly competitors.

It is also important to bear in mind that presently, in most countries, competition law is very demanding and restrictive and that failure to comply with it is subject to heavy penalties which can have collateral effects on the credibility and reputation of the institutions.

The requirement to comply with the highest ethical standards and the expression 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 matter, since **integrity and good reputation in business practices are decisive for strengthening the confidence of its customers.** EDP therefore seeks to act in full compliance with the best practices of healthy competition, undertaking the training and updating of its employees regarding national and international competition laws and prohibiting any practices that restrict competition, even in countries where there is no legislation in this area.

## We must

01



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

02



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

## We must not

01



Adopt any practice prohibited by competition law.

02



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

**Q:**

I was informed by someone who works for a competitor company that that company will soon be unable to market electricity. Should I raise the price of my offer on the market?

**A:**

No. This information may be used as a presumption of concerted practice between agents, so you should immediately request the disclosure of that information by the other market agents (ideally registering your position) and, as soon as possible, inform the responsible Direction and/or EDP's Legal Advisory Department about what happened.



## Related documents

- EDP
  - [Healthy Competition Practices](#)
- EDP Brazil
  - [Standard for Combating Illicit Acts](#)
  - [Compliance Standard](#)

**Q:**

I was able to discern through informal channels that a direct competitor is in a financial situation near insolvency. I know that if I run a discount campaign that is below the cost of providing the service, within three months the competitor may leave the market. How should I act?

**A:**

You must continue to act independently in accordance with the established commercial strategy, without predatory pricing which, in addition to being an anti-competitive practice, would also be ethically reprehensible, in this case.



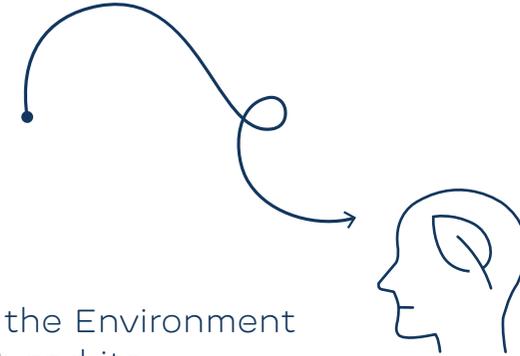
A SECTOR  
UNDERGOING  
TRANSFORMATION



## A SECTOR UNDERGOING TRANSFORMATION

- 3.1 Environment
- 3.2 Energy Transition
- 3.3 Digital Revolution
- 3.4 Entrepreneurship and Cooperation

## 3.1 Environment



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

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

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

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

## We must

01



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

02



Align our activities with national and international environmental protection strategies.

03



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

04



Deepen our knowledge of the environmental risks and impacts of our activity, to improve decision making.

05



Actively promote the development of more environmentally sustainable technologies.

06



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

07



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

08



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

## We must not

01



Use or authorize materials/products, technical solutions and/or internal or subcontracted operational processes that endanger or degrade the Environment, when alternatives which are less harmful to the environment and economically competitive with the former are known.

02



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

03



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

**Q:**

A device in one of our energy generation units has failed. Although the unit may continue to generate, it is known that the levels of pollutant emissions will rise significantly until the device is replaced, surpassing the limits imposed by current environmental licences. The estimated time for carrying out the repair is of four days, the time necessary to purchase and receive the equipment. Should I stop the unit even though I know that in this situation I will not be in compliance with a supply agreement?

**A:**

Yes, you should stop the unit immediately and repair it within the shortest period of time possible.

**Q:**

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

**A:**

You should immediately report this situation, preferably to the department responsible for the work and demand the collection of waste left at the work site as well as its forwarding to the licensed Waste Operator; restoration of environmental conditions on site should also be required. If you do not feel comfortable, or do not know who to turn to, the case can be reported on the Ethics Channel.

**Q:**

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

**A:**

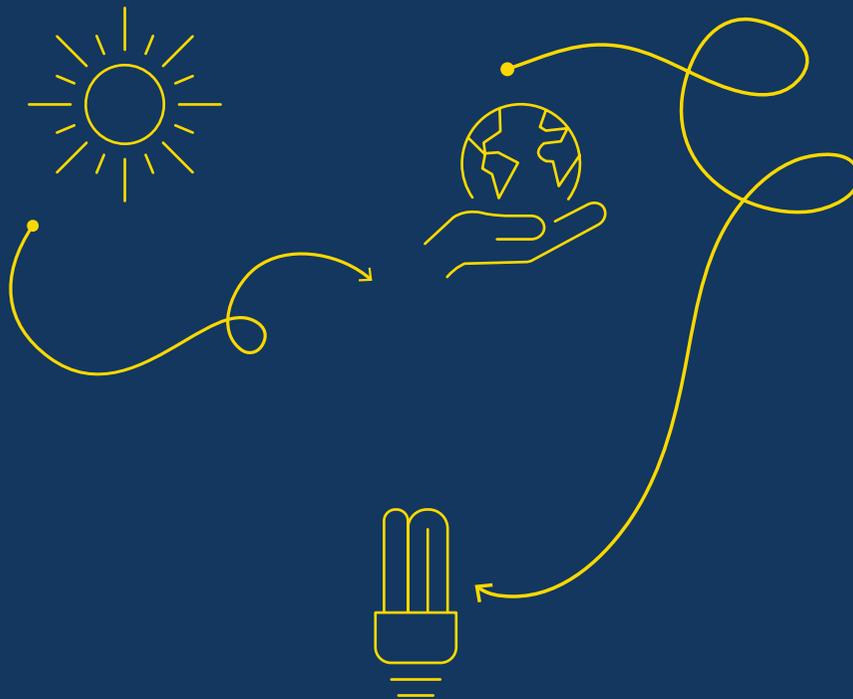
You should report the situation in writing to the contract manager. In this way they are helping EDP and the other companies involved to fulfil all legal obligations to which they are subject. This is complying with the applicable law and internal procedures, namely on environmental legislation, putting nothing and nobody at risk.



## Related documents

- EDP
  - [Sustainable Development Principles](#)
  - [Environment Policy](#)
  - [EDP's Materiality](#)
  - [EDP Commitment to the Sustainable Development Goals](#)

## 3.2 Energy Transition



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

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

**We are committed to achieving carbon neutrality in our activities and to promote reducing emissions with our business partners.**

Throughout its value chain, EDP will continuously promote energy efficiency and replacing fossil energies with renewable energies, aiming to contribute to a new economy and ways of life that respect the planet and promote social well-being.

In EDP's view, it is not only electricity that should be decarbonized. Through continuous innovation, renewable electricity production should increase to replace fossil fuel consumption in industry and transport. Through renewable electricity it will be possible to produce green hydrogen and ensure the decarbonisation of the planet.

## We must

01



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

02



Create emergency plans and reinforce the infrastructure's resilience to handle extreme events.

03



Develop smart energy production and consumption management, ensuring the digital inclusion of all.

04



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

05



Contribute to the increase of "energy literacy", both internally and externally, by helping to place us, as well as the population in general, with greater and better capacity to intervene in a fair and equitable energy transition.

06



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

07



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

08



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

09



Contribute to the awareness on climate change and energy transition.

## We must not

01



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

02



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

03



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

Q:



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

A:

Yes, you did. Particularly as it is an action more in line with EDP's commitments to the reduction of CO<sub>2</sub> emissions, you are acting most appropriately.

Q:



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

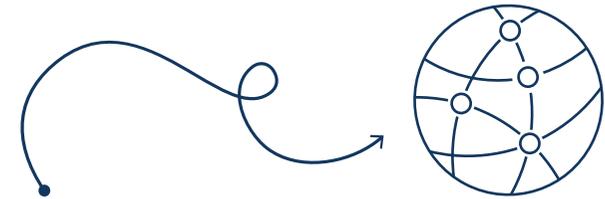
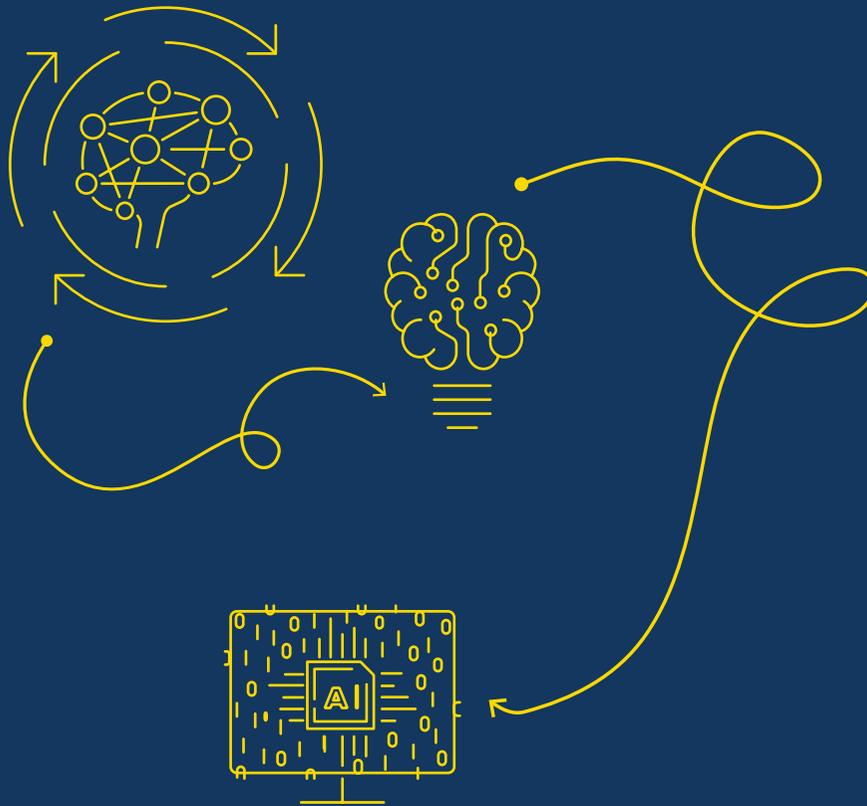
A:

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

## Related documents

- EDP
  - [Sustainable Development Principles](#)
  - [EDP Commitment to the Sustainable Development Goals](#)
  - [Code of Conduct for Top Management and Senior Financial Officers](#)

## 3.3 Digital Revolution



Technology is a key part of EDP's strategy and is decisive in the way the company manages its assets and relates to its customers and stakeholders in general. In 2018, the Company's management even stipulated that it should evolve decisively to position itself as a **"digital utility"**.

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

EDP is aware of its responsibility in this matter, unequivocally recognising the need to ensure careful and **ethically committed management of information systems**, at all stages of the information life cycle, including system design, source selection, knowledge extraction, data integration and analysis, as well as the development of analytical model algorithms.

Thus, the Company is aware of the need to carry out a systematic assessment of ethical risks, paying particular attention to the use of Artificial Intelligence in its various developments, the quality assurance of its business data and the consistent practice of cybersecurity procedures.

## We must

01



Identify, assess and document ethical risks, in the stage prior to the design or acquisition of technologies, mainly disruptive technologies, such as artificial intelligence, robotics and 5G.

02



Ensure transparency and interpretability of the results obtained, ensuring that they are auditable and reproducible.

03



Prevent, still in the design stage, ethical risk through the use of quality and integrity assurance processes of data and methods, through the clear knowledge, and registration, of the data and algorithms involved.

04



Monitor the systems permanently also from the point of view of their potential ethical impact.

05



Promote a culture of accountability for the impacts of their actions on users and producers of technology, ensuring the necessary training.

06



Ensure from the very beginning in the design stage of systems, the incorporation of ethical criteria in decision-making, aiming at the applicability of digitalisation concepts for the benefit of society in general and, namely, to guarantee proportional human control in all autonomous and critical systems.

07



Promote scientific employment to attract people with very specialized knowledge in new technologies and at the same time strive for them to remain within EDP.

08



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

09



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

## We must not

01



Allow the development of systems or analytical models which promote or result in injustice or discrimination.

02



Ignore signs of ethical impacts caused by any technology in use and not report it immediately.

**Q:**

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

**A:**

If in doubt, you should report your concern immediately, so that a comprehensive and accurate assessment of your suspicion can be carried out.

**Q:**

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

**A:**

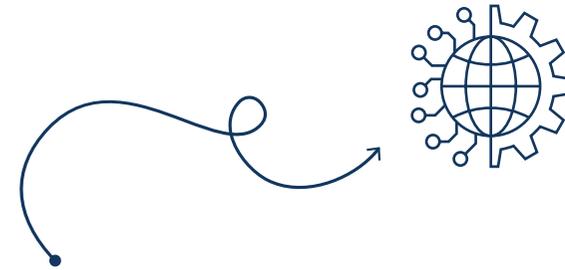
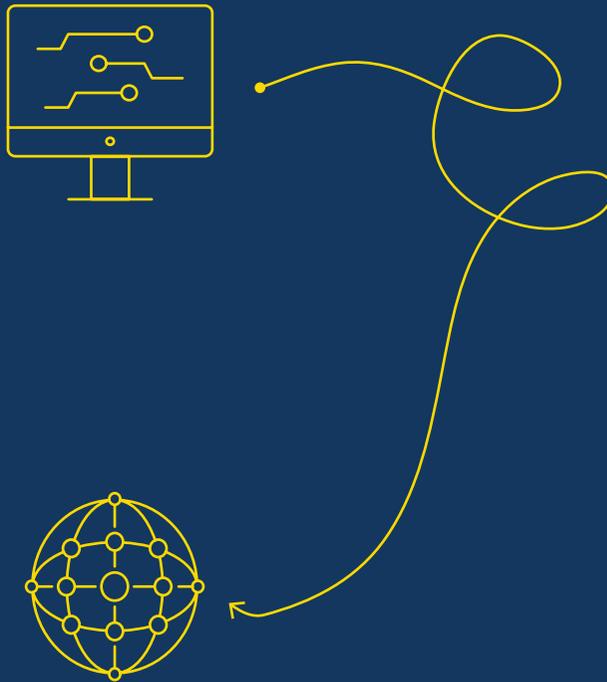
You should insist on this concern with the head of the task group and, if your concerns are still not addressed, you should use the other reporting channels for this purpose.



## Related documents

- EDP
  - [EDP Group’s Information Security Policy](#)
  - [IT Policies and Procedure](#)
- EDP Brazil
  - [Information Security Standard](#)

## 3.4 Entrepreneurship and Cooperation



In an era where technology and society are evolving at a faster pace than the market development, EDP, anticipating the impacts and opportunities arising from this, has committed to **promoting innovation, creativity, collaborative practices, research, technological development and knowledge management in the field of energy.**

Nowadays, we are witnessing the transition from a competitiveness focused on factors of a tangible nature to a competitiveness in which the emphasis is on new working methodologies, and also increasingly on networks of companies that coordinate and cooperate through dynamic structures with varying duration.

In the digitally interconnected world, business ecosystems are becoming larger and more complex than ever and, while generating value, they also inevitably generate corporate risks from the actions of external parties. The first line of defence must be redefined by not being limited to organizational limits but extending to the broader network that adds value for all stakeholders.

In this paradigm, the ethical performance of the various players and their respective risk management becomes essential to **ensure that the high pace of transformation and innovation does not overlap with the ethical principles** assumed by EDP and by each of its employees.

## We must

01



Ensure that in these new ecosystems all partners comply with commonly accepted ethical principles.

02



Encourage collaborative practices with a common purpose.

03



Encourage openness and transparency in order to learn from mistakes.

04



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

05



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

## We must not

01



Violate confidentiality of the information to which we have access and, in particular, avoid disclosing intellectual property of third parties to situations which could lead to its appropriation by other entities.

02



Invest in a personal capacity in opportunities identified within the context of the Company.

**Q:**

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

**A:**

Not as a rule. However, there may be exceptions which should be analysed with your hierarchy.

**Q:**

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

**A:**

Yes. EDP is in the habit of sharing its best practices, particularly in the area of ethics, and for this reason you can share them with these organizations that will now be part of our ecosystem, but remember to line out this activity with the Compliance area.

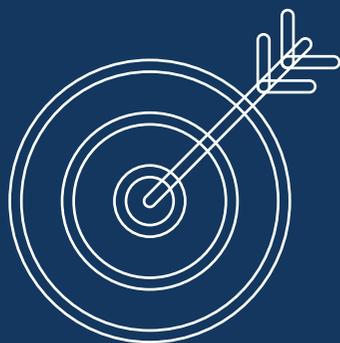
**Q:**

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

**A:**

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

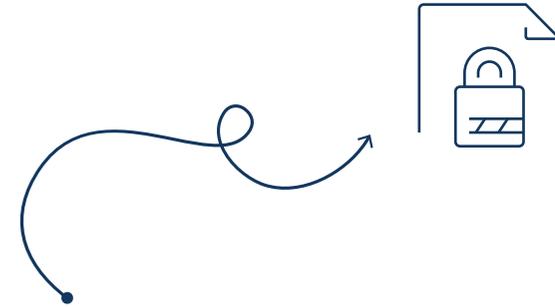
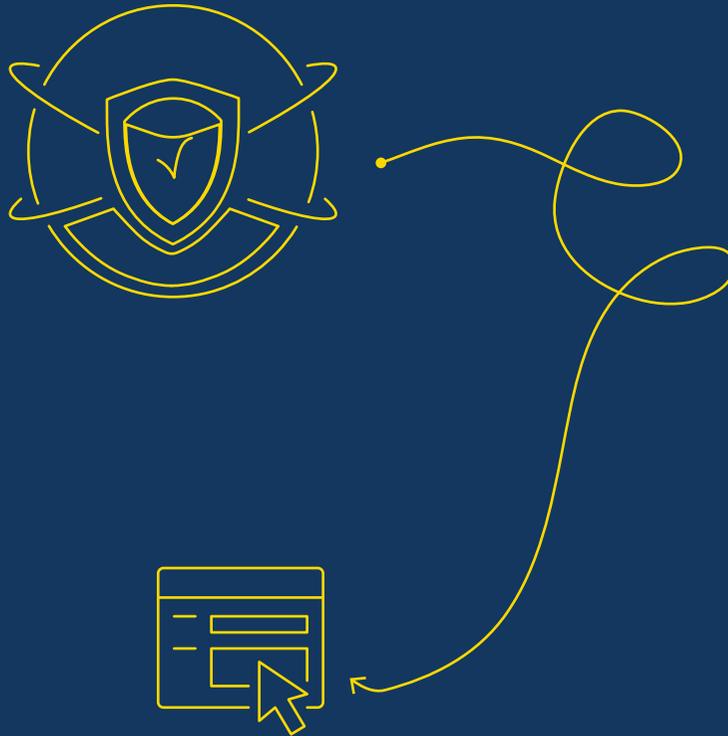




## ACTION WITH INTEGRITY

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

## 4.1 Privacy and Personal Data Protection



Privacy is a fundamental right.

With regard to the processing of personal data, its subjects are entitled to a series of precautions that will effectively preserve their privacy and protection.

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

EDP has policies and procedures in place that **ensure the privacy, security and protection of the personal data of all** its employees, suppliers and other subcontractors, customers and stakeholders in general. Suppliers who are entitled to act on behalf of EDP must also provide guarantees of compliance with privacy of personal data protection requirements.

## We must

01



Tailor the processing of personal data to duly legitimate purposes and ensure that access to data is made on a “need-to-know” basis.

02



Respect the rights of data subjects and ensure that requests received are answered promptly.

03



Provide the data subjects with all relevant information on the data processing carried out, in particular about the purposes for which the data will be used.

04



Ensure that data processing and conservation are carried out securely, applying appropriate technical and organisational measures.

05



Respond promptly and appropriately in the event of a breach of privacy and data protection.

06



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

## We must not

01



Use personal data without any grounds for legitimacy.

02



Share personal data with third parties without the explicit consent of the data subject or any other ground of legitimacy.

03



Transfer personal data outside the country of origin without first obtaining advice from the Compliance department.

04



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

05



Keep personal data from its subjects for longer than is strictly necessary.

**Q:**

I know one of our partners urgently needs to hire an accountant, and I know one of our customers fits the intended profile perfectly. As it is for the benefit of the customer, can I provide their data to this partner?

**A:**

No. The personal data to which we have access must not be processed for purposes other than that for which they were collected, unless there is explicit consent from the data subject or other legal grounds for that purpose.

**Q:**

I am preparing a commercial offer campaign for our customers, which includes free gifts for personal use and I think it would be ideal to automatically select them based on profiles and personal information. Can I do this?

**A:**

No. Profiling and automated individual decision are only possible if there is explicit consent from the data subject or on legal grounds.

**Q:**

I want to send a surprise birthday present to a colleague's house. I asked the Human Resources Department to give me their address and I was told me they cannot do this because it would be "violating my colleague's right to privacy". As I think this is taking things too far, should I report it?

**A:**

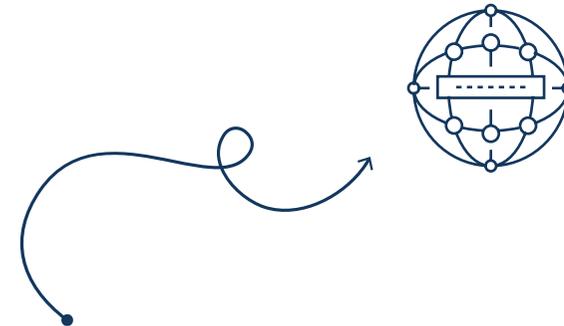
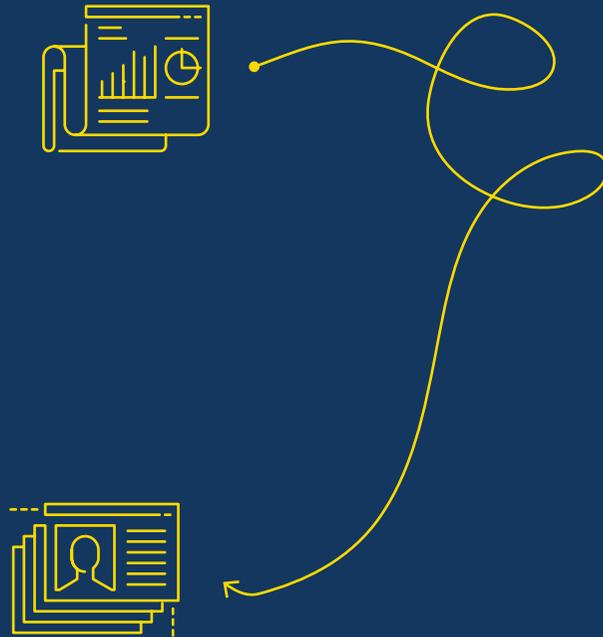
You should not report it. The answer you received is correct because we have to comply with the employee's right to protection and privacy of personal data, and their disclosure is not allowed for purposes other than those they were originally collected for.



## Related documents

- EDP
  - [EDP's Personal Data Protection Policy](#)
- EDP Brazil
  - [Information Security Standard](#)
  - [Standard for Combating Illicit Acts](#)
  - [Compliance Standard](#)

## 4.2 Use of Company Information



Information is a fundamental business resource, therefore its proper and responsible management is not only vital to generate increased advantages over the competition in terms of innovation, institutional image and competitiveness along the value chain, but also to reduce the risk of its misuse, whether intentional or not.

Thus, since **information is an essential part of EDP's assets**, we strive to ensure not only its confidentiality, protecting it against disclosure to unauthorized individuals, but also its **integrity**, protecting its undue alteration, and, also, its **availability**, thereby ensuring it is accessible when and where it is necessary.

In a world that is always connected, namely with the increasing use of social networks, any incorrect, inadequate or misrepresented information can lead to loss of value and produce substantial negative consequences for the image of any company. At EDP, this fact takes on a greater dimension as it is responsible for managing and safeguarding critical energy infrastructures.

EDP has policies and procedures that allow **adequate protection and management of the Company's information** as well as that of its stakeholders and promotes training for employees in this matter.

## We must

01



Always maintain secrecy regarding privileged, confidential and sensitive information, communicating this information only to those who are legitimately entitled to it.

03



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

06



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

02



Whenever we become aware of facts that may have a material influence on stock prices and until their official disclosure: i) keep this information under wraps; and ii) not transact securities of EDP companies, of strategic partners or of companies involved in transactions or relationships with EDP or financial instruments related thereto.

04



Ensure information integrity, protecting it from undue changes in the introduction, processing and its result, which lead to its accuracy and/or consistency to be lost.

07



Protect confidential information by promoting a clean desk policy.

08



Update, according to internal policy, the passwords for access to computer systems.

05



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

## We must not

01



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

02



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

03



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

**Q:**

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

**A:**

Campaigns are commercial products and assets of the company which, moreover, may involve copyright. Thus, they cannot, without prior authorisation, be used for other purposes.

**Q:**

I found out today, by overhearing a conversation between two directors, that there is a strong possibility that the major project I am working on will be cancelled. Nobody has said anything to me yet, but as my contract ends soon, I do not think it will be further extended. Can I post on my LinkedIn page to say that I might be available soon to take on a new professional challenge, because the project I am working on could be cancelled?

**A:**

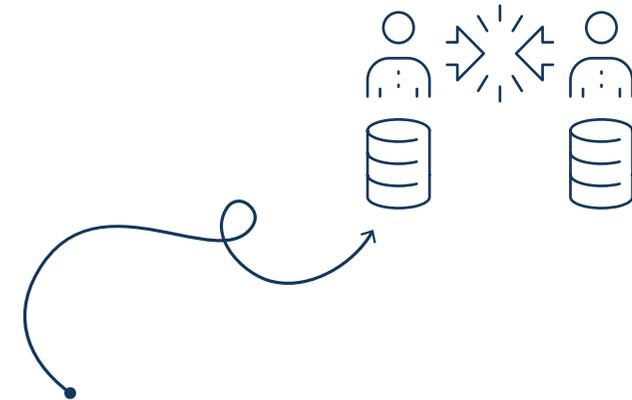
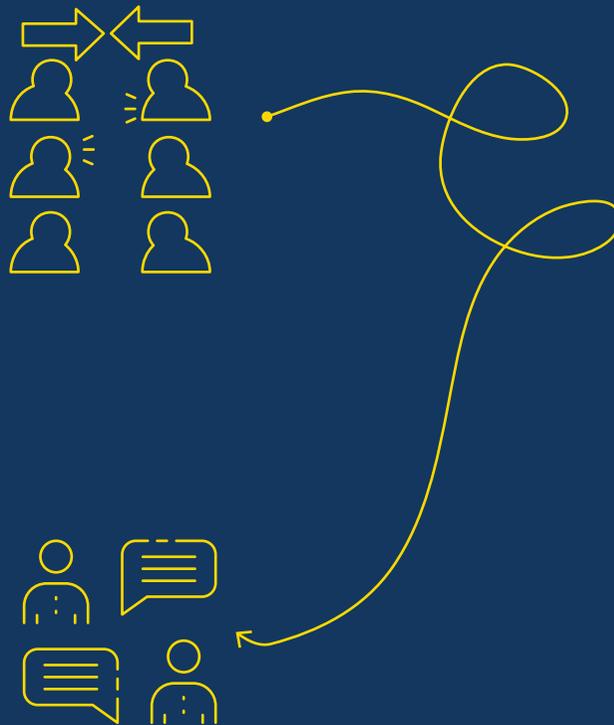
As an employee, you have a duty to maintain your loyalty to EDP by not disclosing information regarding your organisation, production methods or business. Therefore, even if you are concerned, you cannot talk about the possibility of the project you are working on being cancelled to anyone, not least because it is a confidential matter that has not yet been publicly disclosed.



## Related documents

- EDP
  - [EDP Group's Information Security Policy](#)
- EDP Brazil
  - [Information Security Standard](#)

## 4.3 Conflict of Interests



A conflict of interest is represented by a circumstance and/or fact in which our personal interests (family or friendships) may affect our decision making, in accordance with EDP's interests, or interfere with our obligations as employees or partners.

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

EDP undertakes to develop and apply internal rules aimed at the prevention of conflicts of interest and to do its best to ensure that in transactions in which it participates, mechanisms are in place to prevent them.

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

## We must

01



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

02



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

03



Be aware that there are limitations to the transaction of goods and the contracting of services by EDP to related parties, such that we are bound to comply with the applicable internal rules.

04



When covered by EDP's Conflict of Interests Regulation and transactions involving EDP related parties, become familiar with the procedures for preventing, identifying and resolving relevant Conflicts of Interests, particularly in Businesses of Significant Importance between Related Parties.

## We must not

01



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

02



Undertake private professional activities during the working period.

03



Engage in external professional activity, with or without wages, which hinders the fulfilment of our professional duties or EDP's activities or interests, namely trading independently or on behalf of other competing with the Company.

04



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

**Q:**

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

**A:**

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

**Q:**

Parallel to my work at EDP, I am working at a Catalogue Sales company. Can I show the catalogue and sell at the company?

**A:**

No, this action is not allowed. No EDP employee may carry out private professional activities during the working hours.

**Q:**

I am participating in a recruitment process in which there is a person whose profile seems to be the most suitable for the job vacancy. This person happens to be my friend. I would like to offer a favourable opinion, but I am afraid that this is or may appear to be a conflict of interests. Does the conflict of interests only apply to family or does it also cover these situations?

**A:**

The conflict of interests can be caused by kinship or by relationships with friends, so in this case you must inform your manager and the department director of your personal relationship and withdraw yourself from the decision-making process.

**Q:**

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

**A:**

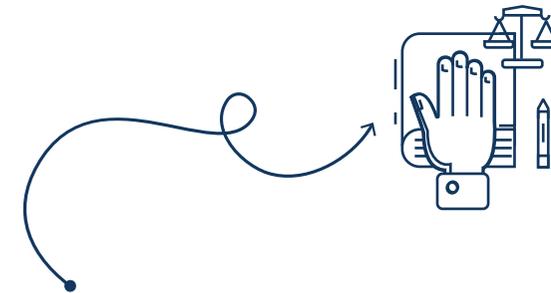
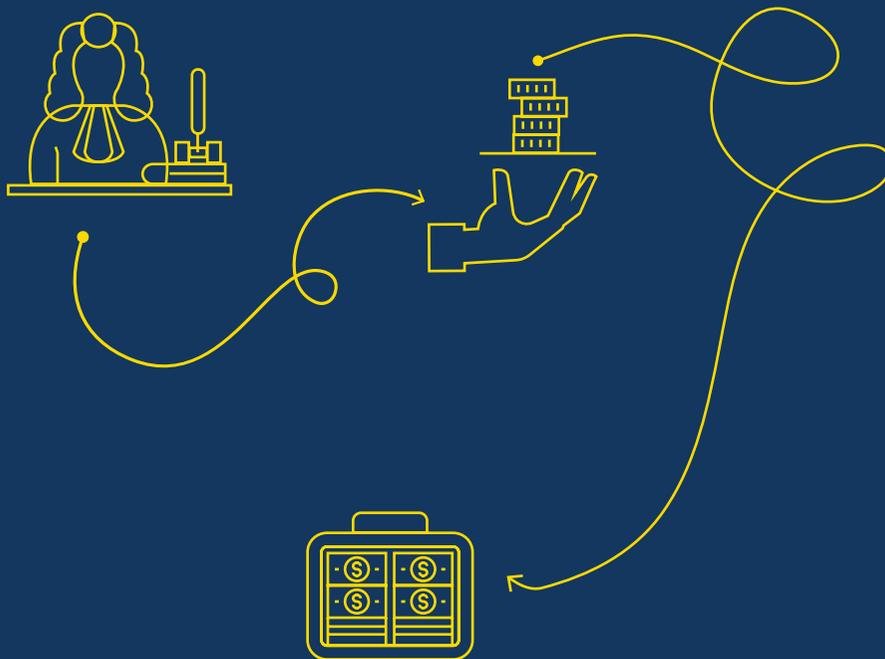
No. To help your brother-in-law you can try to identify the problem internally, but you cannot promote its resolution or ask this to be done in a way that unjustifiably benefits your family member.



## Related documents

- EDP
  - [Regulations of the Audit, Control and related party transactions committee of EDPR](#)
  - [Transaction with Related Parties](#)
  - [Code of Conduct for Top Management and Senior Financial Officers](#)
  - [EDPR Supplier Code of Conduct](#)
- EDP Brazil
  - [Standard for Combating Illicit Acts](#)
  - [Compliance Standard](#)

## 4.4 Corruption and Bribery



Illicit acts such as corruption, influence peddling, money laundering or terrorist financing jeopardises the peace, security and well-being of citizens, as well as the stability of markets. These practices also undermine democracy and the Rule of Law, diverting resources necessary for the growth and development of society, and promoting instability, insecurity and mistrust among citizens. Therefore, in a framework of zero tolerance, the prevention and fight against corruption and bribery has been widely and increasingly adopted at a global level, namely in the proliferation of legislation and promotion of cooperation between private entities and public authorities.

EDP prohibits the practice of corruption and bribery, in active or passive forms, either through acts or omissions, or through the creation and/or maintenance of situations of favouritism through facilitation payments or other irregularities.

**EDP has measures to prevent, detect, correct and control all forms of corruption.**

## We must

01



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

02



Respect, in the relationship with employees and those responsible for public entities, the duty of exemption to which they are subject, avoiding any action which, directly or indirectly, has a fraudulent, coercive, manipulative or deceptive influence, and refrain from giving them or promising any kind of benefit which is not due to them.

03



Make known, comply with and enforce internal rules on facilitation payments, political contributions, donations and sponsorships.

04



Comply with internal rules regarding due diligence in the integrity identification and analysis (Integrity Due Diligence) of third parties before establishing business relationships, ensuring the adoption of planned and applicable risk mitigation mechanisms.

05



Report any signs of alarm or actions which may be associated with a potential act of corruption, bribery and/ or other unlawful acts on the appropriate channels.

## We must not

01



Accept or offer gifts, presents, loans, hotel stays, personal services or other gratuities, even if in the form of preferential treatment of customers, suppliers, a governmental authority or any other person or entity related to the Company's business, which may result in obtaining some kind of personal advantage, for the Company or for undue third parties.

02



Accept or offer any equity advantage or its promise in return for any act or omission contrary to the functions performed and/or when such advantages are not due.

03



Make monetary or other contributions to political parties on behalf of the company.

04



Make recommendations to customers, even if requested by them, of suppliers, or of companies which may even be indirectly related to the Company's business.

**Q:**

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

**A:**

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

**Q:**

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

**A:**

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

**Q:**

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

**A:**

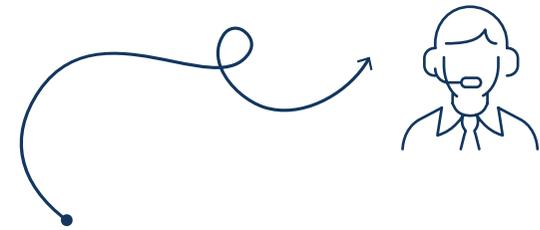
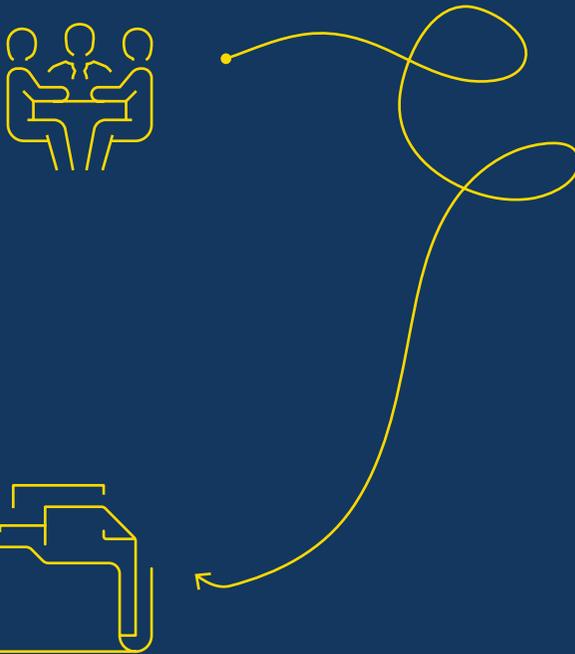
No. It is forbidden to accept any gifts or presents when entering into new contracts or renewing contracts. Additionally, EDP Brazil's rule also vetoes receiving invitations for events that are not of an institutional nature.



## Related documents

- EDP
  - [EDP's Integrity Policy](#)
  - [EDP Group's Social Investment Policy](#)
  - [Code of Conduct for Top Management and Senior Financial Officers](#)
  - [EDP Supplier Code of Conduct](#)
- EDP Brazil
  - [Standard for Gifts, Presents and Events](#)

## 4.5 Money Laundering and Countering the Financing of Terrorism



EDP's work is guided by high ethical standards, business integrity and strict respect for and compliance with current legislation and regulations regarding the prevention of money laundering and the financing of terrorism. As such, EDP adopts all the necessary procedures to **know the identity of the relevant counterparties** of the businesses it intends to undertake and only finalises these businesses after ensuring the legal origin of the funds handled by the counterparty.

EDP has a set of **policies and procedures** – namely contained in the Programme for the Prevention of Money Laundering and Countering the Financing of Terrorism – which encompass a set of measures aimed at responding to the legal duties and requirements associated with these matters, such as procedures for Due Diligence (DD) and Know Your Customer (KYC). Such policies and procedures establish concrete measures that must be adopted to comply with all the legal and

regulatory obligations of EDP, taking into account the different characteristics of the different business areas and the potential risk of money laundering and financing of terrorism faced.

In order to ensure the effective application of the procedures laid down in this area, a **governance model** was systematized along with the specification of different functions and responsibilities in fulfilling the legal duties to which EDP is bound.

EDP employees ensure the strictest compliance with both the legislation applicable to the different activities and jurisdictions in which we operate, as well as internal procedures which have been specified concerning this matter, and undergo training to enable them to perform their essential functions in this area in the best way.

## We must

01



Report all suspicious and/or doubtful situations as soon as possible, through the channels internally provided for this and maintain strict confidentiality about them.

02



Identify/get to know our counterparties, including their respective actual owners, before entering into any business or transaction, in order to ensure that we are working with legitimate counterparties and that their funds do not originate from criminal activities.

03



Review the counterparty's identification elements at appropriate intervals and make sure that the funds involved continue to have a lawful origin.

04



Only receive and make payments to and from entities previously subject to internal procedures of Due Diligence (DD) and Know Your Customer (KYC) and with which we have duly authorized contracts under the terms of the respective internal procedures.

## We must not

01



Initiate a business relationship or carry out any transaction if the counterparty is suspected of being involved in money laundering or terrorist financing practices.

02



Accept cash payments. However, when there is no other possibility, we will always have to respect the legally authorized maximum amount and we should first seek the necessary internal authorisations to undertake this.

03



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

**Q:**



A counterparty is in a hurry to close a contract, the return is huge, can I “lighten up” the process?

**A:**

No. Any contract must be scrutinized by the procedures established internally, and always comply with all the pre-established steps. Any change to the process translates into a failure to comply with internal regulations, with possible consequences for the employee and/or employees who undertake this, which may also have negative impacts for EDP itself, both in administrative and in reputational terms.

**Q:**



I came across a business transaction with a level of profitability far higher than normal. Should I raise the alarm?

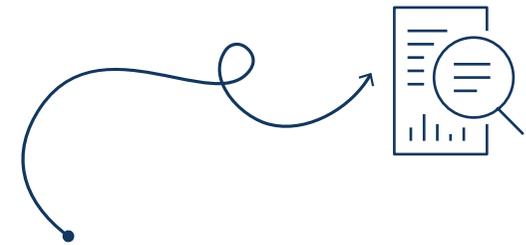
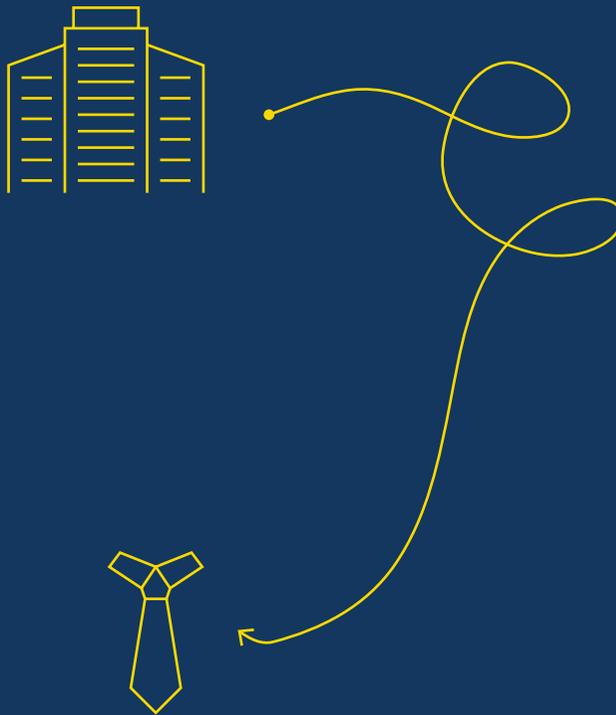
**A:**

Yes. Any business transaction with profitability levels well above average must be rigorously scrutinized, following all internal procedures developed for this purpose.

## Related documents

- EDP
  - [EDP’s Integrity Policy](#)

## 4.6 Use of Assets



The **assets**, tangible or intangible, of companies or third parties entrusted to us include the multiple and diverse resources that are made available to employees to carry out daily work.

We have a **duty to protect and use resources responsibly**, including intellectual property and our own time, aware that if incorrectly used or wasted, they adversely affect our individual and collective performance and, therefore, the value of the company.

EDP has policies and procedures in place to ensure the management of its own assets and those of third parties entrusted to it, with the objective of safeguarding their respective value.

## We must

01



Watch over the tangible or intangible assets of EDP or third parties entrusted to us, including computer systems and intellectual and industrial property, even if produced by us, using it only when carrying out business processes and ensuring its efficient use.

02



Use any and all computer resources (hardware, software, application systems, electronic mail, internet and LAN network) which comply with EDP's internal regulations.

03



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

## We must not

01



Use company resources for personal purposes. Limited use of communication tools (email, phone, internet) may be acceptable as long as this does not interfere with our job responsibilities.

02



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

03



Use for private purposes or share with third parties, technologies, methodologies, know-how and other information owned or governed by EDP, its customers or suppliers.

04



Share software or any other content that may cause damage to company or third party assets.

05



Sell or donate EDP assets without the respective authorization.

Q:



Can I bring home a Company piece of equipment that nobody uses anymore and that I can use at home?

A:

No. Even if the asset is at the end of its working life, it should not be made available to anyone, without the proper authorization for that purpose. All goods belong to the company's assets, regardless of their current use.

Q:



I inadvertently destroyed a set of documents and as I was afraid of what might happen to me, I chose not to say anything to anyone. Now, my manager is asking me for those documents, saying that they should have been sent to EDP, but that there is no record of them being received. What should I do?

A:

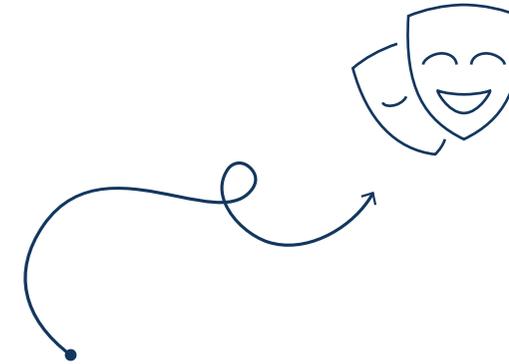
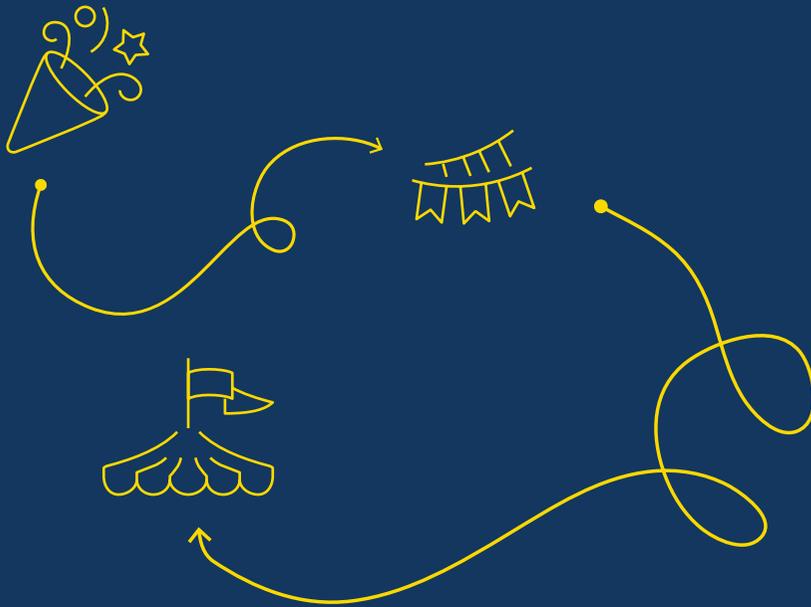
You will have to say that you destroyed them unintentionally and face the consequences. Not having reported the destruction of the documents when it happened is serious, but not accepting your errors and making it impossible for them to be repaired and mitigating the consequences is unacceptable.



## Related documents

- EDP
  - [EDP's Information Security Policy](#)
  - [IT Policies and Procedure](#)
- EDP Brazil
  - [Information Security Standard](#)

## 4.7 Gifts and Entertainment



The practice of offering gifts, hospitality and courtesies, as well as legitimate expenses of the Company, are an important and normal part of creating and maintaining business relations. However, they can be applied to hide conduct involving corruption and bribery, so the exchange of “anything of value” should always occur in moderation, be proportional to the context of business activities and comply not only with internal rules and procedures, but also with the rules of the counterparty organization and with local legal requirements.

The eventual practice of offers must be **transparent**, **consistent** with local culture, **reasonable** in the face of professional courtesy, and supported by information circuits which transfer the power of decision on this practice to managerial superiors.

At EDP we do not offer or receive gifts that may generate inappropriate perceptions about business decisions or undue advantages.

EDP has **measures for detecting, correcting and controlling** acts related to this type of gift and/or entertainment expenses.

## We must

01



Make known, comply with and enforce internal rules on gifts, meals and entertainment, travel and accommodation.

02



Record all exceptional offers made and received in the existing mechanisms for this purpose and those which exceed the regulated value and/or periodicity.

03



Report any alarm signals or actions in the appropriate channels which may be associated with potential undue exchanges of "anything of value".

04



To act in such a way that the external perception of our behaviour in this area is always unambiguous with regard to our integrity.

## We must not

01



Accept or offer gifts, presents, loans, hotel stays, personal services or other gratuities, even if in the form of preferential treatment of customers, suppliers, a governmental authority or any other person or entity related to the Company's business, which may result in obtaining some kind of personal advantage or for undue third parties.

02



Accept or offer any equity advantage or its promise in return for any act or omission contrary to the functions performed and/or when such advantages are not due.

**Q:**

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

**A:**

This situation should be reported to your line manager. It is an offer which, for all effects, has an associated value. The implications of accepting this offer should be discussed within the context of EDP rules. It is an offer which, for all effects, has an associated value. The implications of accepting this offer should be discussed within the context of EDP rules.

**Q:**

We are about to close a new deal with a foreign customer. This transaction is important to fulfil my department's objectives. The client's manager is in Fortaleza, so I thought it would be a good idea to offer him a weekend in Jericoaquara as a courtesy. Can I do this?

**A:**

No. Offers to customers must be reasonable and never offered in pre-decision periods, as they may be associated with bribery practices. The integrity of the contracting processes and EDP's image in the market are more important than any new contract. For your information: the standard for gifts is set at a maximum of R\$ 100 for this type of courtesy.

**Q:**

As part of my duties, I organise meetings, events and trips. Now one of the hotels we usually work with has offered me a weekend stay so that my parents can celebrate their wedding anniversary. Can I accept this kind offer?

**A:**

No. Even if the benefit is for family, accepting this offer would make it more difficult to be impartial when organizing future reservations for EDP. You should politely refuse this and make it clear why.



## Related documents

- EDP
  - [EDP's Integrity Policy](#)
  - [EDP Group's Social Investment Policy](#)
  - [Code of Conduct for Top Management and Senior Financial Officers](#)
  - [EDP Supplier Code of Conduct](#)
- EDP Brazil
  - [Standard for Gifts, Presents and Events](#)



A.

# EDP Energias do Brasil Ethics Committee

Listed companies, such as EDP Energias do Brasil, have their own Ethics Committee, with participation from the Ethics Ombudsman. The members of these Committees are also on the Ethics Committee of the EDP Group.

EDP Energias do Brasil adopts EDP Group's Ethics policy, which reinforces its specific procedures given its legal and cultural realities.

# Contact channels for ethical matters

The interaction between plaintiffs and EDP Group EDP Brazil on matters of an ethical nature can be made through the Ethics Channel through the following contacts:

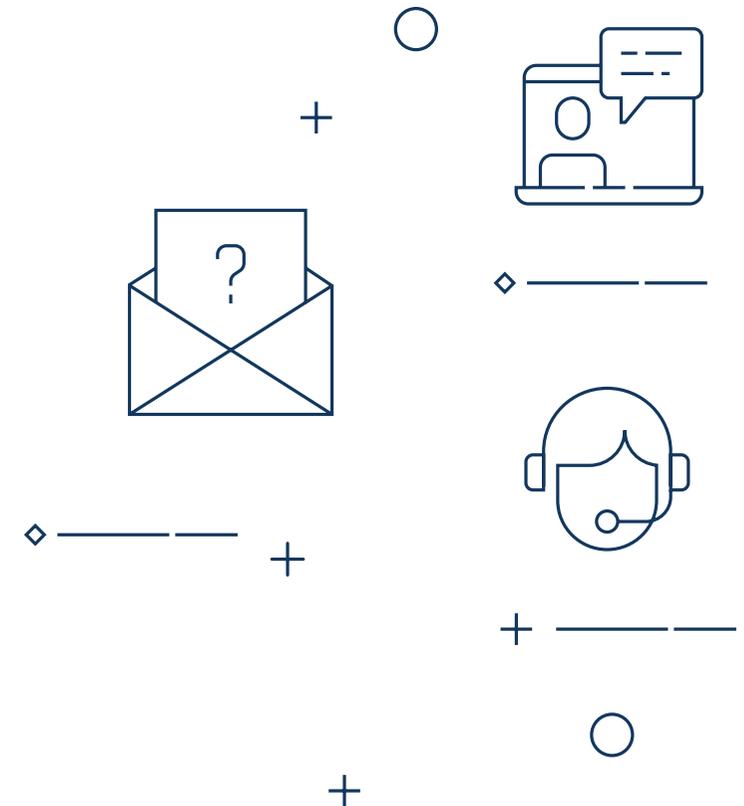
## EDP Brazil Ethics Channel Contacts

**Website:** <https://www.edp.com.br/canal-de-etica-edp>

**Email:** [edpBrasil@canaldeetica.com.br](mailto:edpBrasil@canaldeetica.com.br)

**Phone:** 0800-591-0982

**Post Office:** Caixa Postal nº 521 – ICTS – CEP 06320-971  
Barueri – SP



B.

# Procedure for managing contacts with the Ethics Channel



## Scope of Application

This procedure applies to all reports addressed to the Ethics Channel.

### 1. Contacts Report

Reports from employees, customers, suppliers or other interested parties should preferably be reported by the means presented to use the Ethics Channel, which are: telephone, e-mail, internet and post office box.

Initial screening is handled by an independent and specialized company, whose main objective is to classify the report and ensure that it is forwarded to the investigation team of EDP Brazil's Internal Audit area.

The reports should contain a detailed description of the situation and, preferably, indicate the name and contact information of the whistle-blower for the internal investigation team to obtain the information necessary to carry out a proper investigation.

The Ethics Channel ensures confidentiality even for those who identify themselves, thus, each report will be treated as confidential and the identity of the person reporting will be kept confidential to the extent that the need associated with the investigation allows.

The facts and documents related to the reports are also treated with total confidentiality and people who have access to the information about the cases due to the investigation, are obliged to maintain confidentiality.

The reports are periodically presented to the Ethics Committee of EDP Brazil, composed of the Chief Executive Officer, Chief Operating Officers, the representative of EDP Portugal and the representative of the Ethics Ombudsman's Office of EDP Portugal, who decide on the results of the investigations and propose measures that apply to each situation.

It is worth mentioning that the Committee responsible for the Internal Audit, Compliance and Internal Controls, People Management and Legal areas is part of this Committee, providing operational support.

The consequences for cases with irregularities proven through investigations are provided for in EDP Brazil's Balancing Consequences standard.

It is the responsibility of all employee's to report situations, which they are aware of or will become aware of, contrary to the Code of Ethics, other normative instruments of the company and/or current and applicable legislation. In any case, the company does not tolerate any type of retaliation against a whistle-blower of "good faith".



## 2. Sharing information about contacts directed to the Ethics Channel

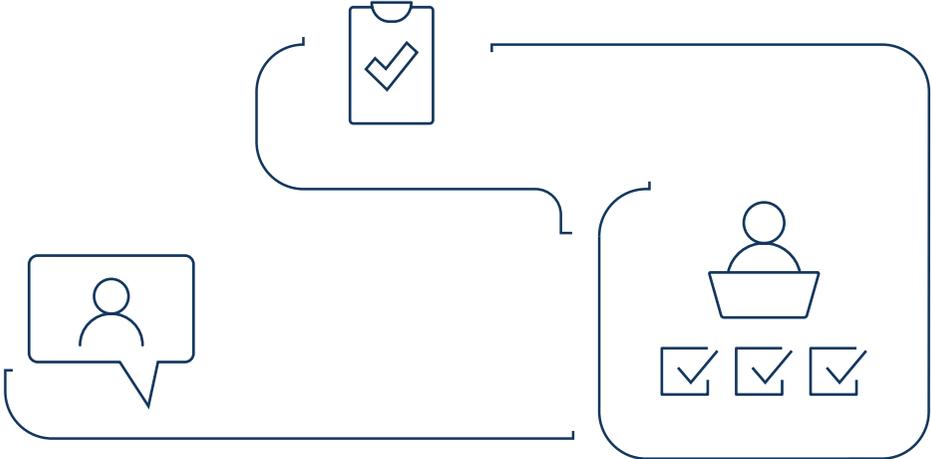
EDP Brazil shares general information about the reports received through the Ethics Channel on a quarterly basis. These disclosures take place in the Company's internal means of communication.



## 3. Conflict of Interests

If a certain report involves any member of the Ethics Committee, it will be presented to the Audit Committee, which will proceed with the necessary negotiations until the process is concluded in order to remain unbiased during the investigation and decision-making process.

In the event that the report involves an employee from the investigation team, the independent and specialized company has a pre-defined flow so that the reported member does not have access to the information, forwarding it to the superior who must remain unbiased during the investigation and decision-making process.





**Corruption and Bribery:** Illicit act of passive/active corruption in the private/public sector in which a person who, by themselves or, through their consent or ratification, through an intermediary, gives or promises, requests or accepts, for themselves or for a third party, without this being due, an equity or non-equity item of value, or its promise, for any act or omission that constitutes a violation of their functional duties<sup>ii</sup>.

**Donations and Sponsorship:** Allocation of financial, human or asset resources to an entity, person, or event, promoted by an external entity, with the objective of developing some social, cultural, or promotional action, among others<sup>ii</sup>.

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

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

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

**Family or family ties:** Spouse or partner, ascendants and descendants and similar up to the 3<sup>rd</sup> degree relatives<sup>ii</sup>.

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

**Money laundering:** The act of converting, transferring, assisting or facilitating some conversion or transfer of advantages, obtained by you or by a third party, directly or indirectly, with the purpose of concealing its illicit origin, or preventing the perpetrator or participant in these offences from being criminally prosecuted or subject to a criminal response<sup>ii</sup>.

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

**Retaliation:** Use of retaliation, revenge or retribution<sup>ii</sup>.

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

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

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

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

**Whistleblowing:** Internal or external disclosure made in the public interest, by an employee or external person (the whistle-blower), of irregularities, negligence or abuse within the activities of an organisation, government agency or company (or one of its business partners), which threaten the public interest or the integrity and reputation of the organisation<sup>vi</sup>.

<sup>i</sup> EDP Code of Ethics; 2013

<sup>ii</sup> EDP Integrity Policy; 2018

<sup>iii</sup> EDP Code of Ethics Brazil; 2018

<sup>iv</sup> European Commission Competition Policy and Consumers

<sup>v</sup> NP ISO 26000 Guidance on social responsibility

<sup>vi</sup> Anti-Corruption Glossary | <https://transparencia.pt/glossario-anti-corrupcao-2/>

<sup>vii</sup> Report of the World Commission on Environment and Development: Our Common Future, United Nations

<sup>viii</sup> Scott Shane, 2003

<sup>k</sup> Regulation on Conflicts of Interest and business between EDP's related parties

<sup>x</sup> EDP Renováveis Anticorruption Policy



EDP Brazil  
Code of Ethics