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**Integrity Policy**  
**EDP Group**

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**1. VERSION HISTORY**

<b>Version</b>	<b>Date of Approval</b>	<b>Draft</b>	<b>Approval</b>	<b>Comment</b>
1	15/05/2018	DAIC	EBD	Initial Issuance
2	02/12/2020	DCO	EBD	Revision

Whereas:

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

It becomes necessary to review the EDP Group's Integrity Policy and the commitments and principles assumed in this matter, thus reinforcing EDP's active role in promoting integrity and preventing unlawful acts.

## 2. PURPOSE

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

In addition, it intends to contribute to fostering ethics and integrity in conducting business in the EDP Group, ensuring compliance with the law and the adopted principles and rules.

## 3. SCOPE

This policy applies to all companies in a controlling or group relationship with EDP Energias de Portugal S.A., to their employees and to service providers acting on their behalf. This Policy is also applicable to Fundação EDP, Fundación EDP and Instituto EDP (hereinafter “Grupo EDP” or “EDP” - which, for the purposes of this Policy shall be considered as EDP Group - to their employees and to service providers acting on their behalf,

This Policy does not seek to address all legal and regulatory requirements of all jurisdictions where the Group operates, but instead seeks to establish a common commitment and a minimum requirement for legal compliance and adherence to the Group's principles.

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

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

Local policies that adapt and develop the principles of this Policy to the particularities of the respective jurisdiction as well as any exception to the application of this Policy due to local legal restrictions, shall be submitted for consultation and review by the Compliance Department (“DCO”) and EDP’s Company Secretariat. Adequate coordination must be maintained so that such policies or procedures remain permanently consistent with the principles established in this Policy and other related procedures.

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

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

#### 4. REFERENCES

- ISO 37001 – *Anti-bribery management systems*;
- Penal Code – Portugal;
- Law n.º 83/2017, of August 18<sup>th</sup>, amended by Law n.º 58/2020, of August 31<sup>st</sup> – measures for the fight against money laundering and terrorism financing;
- Law n.º 52/2019, of July 31<sup>st</sup> – exercise of functions by political office-holders;
- EU Directives on the prevention of the use of the financial system for the purposes of money laundering or terrorism financing;
- Organization for Economic Co-operation and Development Standards;
- Financial Action Group Recommendations and Guides (FATF)
- Penal Code - Spain
- Law N. 12.846, of August 1<sup>st</sup>, 2013 – Brazil;
- *Foreign Corrupt Practices Act* (FCPA) – United States of America;
- *Bribery Act* – United Kingdom.

#### 5. TERMS AND DEFINITIONS

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

**Money Laundering:** Act of conversion, transfer, assistance in or facilitation of any operation of conversion or transfer of advantages, obtained directly or indirectly, by the agent or by a third party, through the typical illicit acts provided for in Article 368.º - A) of the Portuguese Penal Code, , with the purpose of dissimulating their unlawful origin, or avoiding criminal consequences or prosecution for the agent or participant. The definition of money laundering, for preventive purposes, also includes participation in such acts, the association to practice them and the attempt and complicity in their practice, as well as the fact of facilitating their execution or advising someone to practice it.

**Employee:** The natural person hired by any of the EDP Group companies, on a permanent or temporary basis, under an employment contract or internship contract, including similar situations.

**Conflict of Interests:** Situation in which the purpose or the pecuniary or nonpecuniary advantages, whether related or unrelated, which a given decision-maker intends to pursue or achieve with the practice of an action, is suitable of interfering with the performance of duties of impartiality, objectivity and compliance with the Code of Ethics by which the decision-maker is bound in the pursuit of his/her duties or with the interests which the relevant entity of the EDP Group must pursue.

**Corruption:** There are various kinds of corruption, but the following are the most relevant for the purposes of this Policy:

- Passive corruption (of a public official): the unlawful act of passive corruption in the public sector is committed by a public official who, himself/herself or through another person, with that person's consent or ratification, requests or accepts, for himself/herself or for a third party, a pecuniary or nonpecuniary advantage, or the promise of the same, for the doing of any act or omission contrary to the duties of his/her office, even if that act or omission precedes that

request or acceptance, or is not contrary to the duties of the office, but he/she is in no way entitled to such an advantage;

- Active corruption (of a public official): the unlawful act of active corruption in the public sector is committed by anyone who, himself/herself or through another person, with that person's consent or ratification, gives or promises to give a public official, or a third party, at the instruction or with the knowledge of the same, a pecuniary or non-pecuniary advantage, for the doing of any act or omission contrary to the duties of his/her office, even if that act or omission precedes that request or acceptance, or is not contrary to the duties of the office, but he/she is in no way entitled to such an advantage;

- Passive corruption (holders of public office): the unlawful act of passive corruption in the public sector is committed by a holder of political office who, in the course of his/her duties, himself/herself or through another person, with that person's consent or ratification, requests or accepts, for himself/herself or for a third party, a pecuniary or non-pecuniary advantage, or the promise of the same, for the doing of any act or omission contrary to the duties of his/her office, even if that act or omission precedes that request or acceptance, or is not contrary to the duties of the office, but he/she is in no way entitled to such an advantage;

- Active corruption (holders of political office): the unlawful act of active corruption in the public sector is committed by a holder of public office who, himself/herself or through another person, with that person's consent or rectification, gives or promises to give a public official, or a third party, at the instruction or with the knowledge of the same, a pecuniary or non-pecuniary advantage, for the doing of any act or omission contrary to the duties of his/her office, even if that act or omission precedes that request or acceptance, or is not contrary to the duties of the office, but he/she is in no way entitled to such an advantage;

- Passive corruption to the detriment of international trade: the unlawful act of passive corruption to the detriment of international trade is committed by anyone who, himself/herself or through another person, with that person's consent or ratification, requests or accepts, for himself/herself or for a third party, a pecuniary or non-pecuniary advantage, or the promise of the same, to which he/she is in no way entitled, to obtain or preserve a transaction, contract or other undue advantage in international trade;

- Active corruption to the detriment of international trade: the unlawful act of active corruption to the detriment of international trade is committed by anyone who, himself/herself or through another person, with that person's consent or ratification, gives or promises to give to an official (national, foreign or of an international organization) or holder of political office (national or foreign) or a third party, with their knowledge, a pecuniary or non-pecuniary advantage, to which he/she is in no way entitled, to obtain or preserve a transaction, contract or other undue advantage in international trade;

- Passive corruption in the private sector: the unlawful act of passive corruption in the private sector is committed by a private sector employee who, himself or through another, with that person's consent or ratification, requests or accepts, for himself/herself or for a third party, a pecuniary or nonpecuniary advantage, or promise of the same, to which he/she is in no way entitled, for any act or omission which constitutes a breach of his/her employment duties;

- Active corruption in the private sector: The unlawful act of active corruption in the private sector is committed by anyone who, himself or through another, with that person's consent or ratification, gives or promises to give to the private sector employee, or a third party, with the

knowledge of the same, a pecuniary or non-pecuniary advantage, to which he/she is in no way entitled, for any act or omission which constitutes a breach of his/her employment duties.

**Top Management:** Managers or employees with a sufficiently high level of hierarchy to take decisions that affect EDP's exposure to the risk of non-compliance, not necessarily being a member of the management bodies.

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

**Family / Close family members:** Spouse or cohabiting partner, relatives and the like in first degree, in the straight line or in the collateral line, their cohabiting partners, insofar as they do not benefit from the affinity status, and also the people who, in other legal systems, have similar positions.

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

**Public official:** (i) civil servant; (ii) administrative agent; (iii) arbitrators, jurors and experts; (iv) anyone who, even provisionally or temporarily, in return for remuneration or otherwise, voluntarily or obligatorily, has been called upon to perform or participate in the performance of an activity included in administrative or judicial public functions, or, in the same circumstances, to perform duties in community interest bodies or participate in such functions; (v) directors, supervisory board members and employees of public enterprises, whether nationalized, state-owned or having a state-owned capital majority, as well as public service concessionaires; (vi) judges, clerks, agents and equivalents of international public law organizations, irrespective of nationality and residence; (vii) national officials of other States, when the infringement has been committed, in whole or in part, in Portuguese territory; (viii) all those who perform identical functions to those described in i) - iv) in any international public law organization of which Portugal is a member, when the infringement has been committed, in whole or in part, in Portuguese territory; (ix) judges and clerks of international courts, provided that Portugal has declared its acceptance of the jurisdiction of such courts; (x) all those who perform duties in non-judicial dispute resolution procedures, irrespective of nationality and residence, when the infringement has been committed, in whole or in part, in Portuguese territory; (xi) jurors and national arbitrators of other states, when the infringement has been committed, in whole or in part, in Portuguese territory.

**Facilitation payment:** payment made to a public official or private sector employee in order to endorse or expedite the performance of an action, or to obtain an omission or refusal, contrary or not to the duties of the respective positions or functions, as long as the payment was not due. Consequently, the facilitation payment always presupposes the demand for a consideration (usually pecuniary) for the practice of an act or the adoption of a conduct that should not be demanded according to applicable legal requirements.

**Personal safety payment:** payment made to a public official in order to ensure health or an individual personal security facing a serious risk.

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

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

**Political Exposed Person ("PEP"):** actual person who holds, or has held in the previous 12 months, in any country or jurisdiction, the following prominent public offices: i) Heads of State, Heads of Government and members of Government, specifically ministers, secretaries and under-secretaries of State or equivalents; ii) members of Parliament; iii) members of the Constitutional Court, the Supreme Court of Justice, the Supreme Administrative Court, the Court of Auditors, and members of the supreme courts, constitutional courts and other high-ranking judicial bodies of other States and international organizations; iv) representatives of the Republic and members of the government bodies of the autonomous regions; v) Justice Ombudsman, Councilors of State, members of the National Data Protection Commission, the Higher Council of the Judiciary, the Higher Council of the Administrative and Tax Courts, the Office of the Attorney-General of the Republic, the Higher Council of the Public Prosecutor's Office, the Higher National Defense Counsel, the Economic and Social Council, and members of the Regulatory Body for the Media; vi) ambassadors and consuls; vii) serving Generals and officials of the Armed Forces and police forces; viii) mayors and councilors with executive municipal council positions; ix) members of the boards of governors and supervisory boards of central banks, including the European Central Bank; x) members of the boards of governors and supervisory boards of public institutes, public foundations, public establishments and independent administrative entities, however designated; xi) members of the boards of directors and supervisory boards of state business sector entities, including the business, regional and local sectors; xii) members of the executive management bodies of national or regional political parties; xiii) directors, deputy directors and members of the board of directors or persons who hold equivalent positions in an international organization.

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

**Prevarication:** Unlawful act committed by a public official who, in a judicial enquiry or court proceedings for regulatory or disciplinary offences, knowingly and unlawfully, promotes or fails to promote, conduct, decide or not decide, or do an act in the exercise of powers deriving from the position held; or by a holder of public office who knowingly conducts or decides unlawfully on a process in which he/she is involved in the course of his/her functions, with the intention of thus prejudicing or benefiting someone.

**Global Compliance Program:** set of transversal compliance mechanisms, designed to promote and monitor compliance with relevant regulations in all activities, businesses and geographies in which the EDP Group is present.

**Ethics Ombudsman:** The person responsible for receiving the ethical complaints directed to EDP, managing and documenting the file for each one and guaranteeing reservation on the identity

of the complainant and, whenever legally required, strict secrecy about the identity of the complainant.

**Retaliation:** Reprisals, retribution or revenge.

**International Sanctions:** restrictive measures adopted by specific countries, regional governments and multinational organizations under a specific foreign policy and, usually, in pursuit of security objectives. Sanctions may have a trade, economic or financial nature and can target other countries, specific individuals, institutions, entities or goods and services.

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

**Holders of political office:** a) The President of the Republic; b) The President of the Parliament; c) The Prime Minister, d) Members of Parliament; e) Members of Government; f) Representatives of the Republic in the autonomous Regions; g) Members of Regional Governments; h) Members of the European Parliament; i) Members of local government; j) Members of executive bodies of metropolitan areas and intercity entities. The following officers shall be treated as holders of political office: a) Members of executive bodies of political parties at national and regional level; b) Candidates for President of the Republic; c) Members of the Council of State; d) President of the Economic and Social Council.

**Holders of other political and public office<sup>1</sup>:** natural persons who, while not classified as politically exposed persons, hold or have held in the previous 12 months and in national territory, any of the following positions: a) Public managers and members of the board of directors of a public limited company, exercising executive functions; b) Members of the board of directors of a company in which the State has holdings, when appointed by the State; c) Members of the executive boards of companies in the local or regional business sector; d) Members of the management bodies of public institutes; e) Members of the board of directors of independent administrative entities; f) Holders of the highest-ranking management positions and equivalents in city councils and other municipal services; g) members of the representative or executive body of the metropolitan area or other forms of municipal association. The following officers shall be treated as holders of other public office: a) The heads of cabinet of the members of the Republic and regional governments; b) Representatives or consultants mandated by the Republic and regional governments in processes of concession or sale of public assets.

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

**Employee of the private sector:** person who performs duties, including management or supervisory duties, under an individual employment contract, services agreement or any other, even if provisional or temporarily, in return for remuneration or otherwise, in the service of a private sector entity.

**Influence Peddling:** The unlawful act of influence peddling is committed by anyone who, himself/herself or through another person, with that person's consent or ratification, (i)

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<sup>1</sup> Includes members of the Board of Directors of Regulatory Authorities.

requests or accepts, for himself/herself or for a third party, a pecuniary or nonpecuniary advantage, or the promise of the same, to misuse his/her influence, whether real or supposed, at any public entity; or (ii) give or promise to give a pecuniary or nonpecuniary advantage to the persons referred to in the preceding paragraph for the purpose of obtaining an unlawful favorable decision.

**Unlawful advantages:** Proceeds from the commission, in any form of co-participation, of the unlawful acts that constitute the offences of incitement to prostitution, sexual abuse of children or underage dependents, pornography of minors, computer and communications fraud, extortion, abuse of a guarantee or credit card, counterfeit currency or equivalent securities, depreciation of the value of currency or equivalent securities, passing of counterfeit currency in collusion with the counterfeiter, or equivalent securities, passing of counterfeit currency or equivalent securities, or acquisition of counterfeit currency to be put into circulation or equivalent securities, computer fraud, damage related to computer programs or other information technologies data, computer sabotage, illegitimate access, illegitimate interception or illegitimate reproduction of protected program, criminal association, terrorism, drug trafficking, arms trafficking, human trafficking, aid to illegal immigration, trafficking in human organs or tissues, damage to nature, pollution, activities dangerous to the environment, or danger to animals or plants, tax or social security fraud, influence peddling, undue receipt of advantages, corruption, embezzlement, employee fraud, harmful management in a public sector economic unit, fraudulently obtaining or diverting a subsidy, grant or credit, corruption to the detriment of international trade or the private sector, insider trading or manipulation of the market, violation of exclusive patent, utility model or topography of semiconductor products, violation of exclusive design rights, counterfeiting, imitation and illegal use of trademarks, theft, sale or concealment of products or fraud on goods and of offences punishable with a minimum term of imprisonment of six months or a maximum of over five years, as well as the obtained assets.

## 6. DESCRIPTION AND RESPONSABILITIES

### *i. EDP's Commitments*

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

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

EDP promotes a legally compliant, unbiased, honest, upright, professional and fair conduct and requires that Group entities, their employees and service providers acting on their behalf guide their behavior in accordance with this commitment.

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

In this context, each EDP Group entity implements procedures to prevent and mitigate the risk of occurrence of criminal practices in its activities, such as acts of corruption, prevarication,



money laundering and terrorism financing, or insider trading/dealing. In parallel, these entities also adopt the necessary procedures to detect eventual occurrences of this type and to communicate them to the competent judicial entities. The EDP Group also adopts the necessary procedures to conform its activities to the legal and regulatory standards in force in order to prevent the verification of any violation of standards to which the respective entities and employees are bound, namely in terms of competition, data protection and environment.

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

## ***ii. Principles of Action***

### ***a. General Principles***

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

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

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

- a) corruption,
- b) bribery, including facilitation payments;
- c) money laundering e terrorism financing;
- d) influence peddling;
- e) embezzlement, harmful management in a public sector economic unit;
- f) fraud, extortion;
- g) other crimes against justice;
- h) insider trading/dealing;
- i) crimes against data protection and privacy;
- j) crimes against environment and safety.
- k) antitrust/anti-competitive practices;
- l) financing and association of EDP's brand to political parties, candidates, campaigns, political candidacy structures or related persons or entities;

- m) discrimination against customers or counterparts based on ancestry, gender, race, language, territory of origin, religion, political or ideological beliefs, education, economic status, social status or sexual orientation.

***b. Preventing corruption***

The EDP Group entities, their employees and service providers acting on their behalf may not, under any circumstances, directly or indirectly, give or promise to PEPs, holders of political or public office, public officials, private sector employees and close family members or persons recognized as being closely associated to the aforementioned, as well as to any other third parties, unlawful advantages or any other pecuniary or nonpecuniary advantages, which constitute a return for the doing of any act or omission (i) contrary to the duties of the position, or, (ii) even when not contrary to the duties of the position, there is no entitlement to such advantages (facilitation payment).

In addition, their employees and service providers acting on their behalf may not under any circumstances, directly or indirectly, request or accept, for themselves or for a third party, bribes, pecuniary or non-pecuniary advantages, or promise of the same, in return for the doing of any act or omission (i) contrary to the duties of the position, or (ii) although not contrary to the duties of the position, there is no entitlement to such advantages (facilitation payment).

***c. Relations with Public Officers and Political Exposed Persons (PEPs)***

The relationship of the EDP Group companies, employees and service providers acting on their behalf with PEPs, holders of political or public office, public officials and close family members or persons recognized as being closely associated to the aforementioned, as well as with any holder of public functions, must reflect a conduct of honesty, integrity and transparency, in any and all interactions, whether direct or indirect, active or receptive, ensuring compliance with applicable legislation and defined internal procedures.

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

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

***d. Facilitation payments***

Facilitation payments are unofficial payments, usually not very high in value which are made, in cash or in kind, to secure or expedite a public official decision, procedure or other necessary action, which, by definition, would be lawful and would, under normal conditions, fall within the scope of his public functions.



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

However, recognizing that an employee may exceptionally be faced with situations where a payment is requested to avoid physical harm or an imminent threat to his health, safety and property, payments for personal safety are permitted under the aforesaid exceptional situations<sup>2</sup>.

These payments shall, if circumstances permit, be preceded by consultation with DCO.

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

#### ***e. Gifts and Events***

The offer or acceptance of goods, services, participation in events or other advantages, even if free of charge, is likely to be interpreted as being associated with acts of bribery and / or corruption. In this context, both offers given to third parties and offers received by employees of the EDP Group are relevant.

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

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

- i. in cash or financial instruments, or other values or instruments of a fungible nature;
- ii. when requested by its recipient;
- iii. in situations that may generate some undue benefit or are likely to create a conflict of interest for any of the parties involved;
- iv. that have an illegal or improper purpose or are contrary to the applicable laws and regulations and
- v. that are likely to appear in any of the situations mentioned above or when they have a socially reprehensible nature and / or that may jeopardize the good name and reputation of the EDP Group entities.

#### ***f. Donations and Sponsorships***

The delivery of any kind of benefit to external entities, in the form of sponsorships or donations,

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<sup>2</sup> Examples of these situations are:

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

shall be carried out in an ethical, honest and transparent manner, always in accordance with the applicable law, the principles of the Code of Ethics and of this Policy, as well as obeying the specific rules in the social investment policy and other applicable internal procedures.

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

#### ***g. Contributions to Political Parties***

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

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

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

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

#### ***h. Conflict of Interests***

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

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

All employees who are in an apparent or actual position of conflict of interest with EDP business shall communicate the conflict to their line manager and refrain from doing any act or making any decision related with the said conflict, following the terms of the internal procedures applicable.

Family relationships between employees shall be analyzed on an individual basis for the purpose of mitigating, avoiding or excluding any conflicts of interest. If a risk of conflict of interests is detected, the engagement decision shall be made in accordance with the procedures approved specifically for the purpose.

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



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

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

i. ***Prevention of Money laundering and terrorism financing***

EDP Group entities shall only do business with clients and partners involved in lawful commercial activities and with funds stemming from lawful sources.

EDP Group entities considered obliged to comply with the legislation and sectorial regulations related to the prevention of money laundering and terrorism financing, define and adopt policies, internal control procedures and risk management models that are effective and adequate to their operations, in accordance with best practices and in order to comply with specific legal obligations in terms of anticipating, mitigating, preventing, identifying and monitoring this risk, as well as in what is related to the treatment of information, communication of suspicious operations and to the collaboration with sectoral and judicial authorities.

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

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

The establishment of business relationships, the conduct of occasional transactions or the completion of other operations should be refused when the identifying elements and respective supporting means, as well as information on the nature, object and purpose of the business relationship are not obtained. In these situations, entities must put an end to the business relationship, analyze possible reasons for not obtaining the elements, means or information, and whenever legal requirements are verified, they report suspicious transactions.

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

EDP Group entities, members of their governing bodies and employees must comply with the legal and regulatory duties and the internal policies and procedures regarding the prevention and repression of money laundering

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

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

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

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

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

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

#### ***iii. Compliance Programs***

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

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

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

#### ***a. Responsibilities and Resources***

EDP's Executive Board of Directors ("EBD") is the body responsible for setting out the objectives and for approving and implementing the policies and management models of the company and



of the EDP Group, in line with said strategic objectives, including this Policy and the Global Compliance Program and the respective governance model.

DCO is responsible for promoting the development of the Integrity / Anti-Corruption Compliance Program, ensuring, namely, the identification, assessment, monitoring and reporting of the non-compliance risks.

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

The EBD ensures the availability of resources (human, material and financial) necessary for the implementation, maintenance and continuous improvement of the Global Compliance Program.

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

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

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

#### ***c. Procedures and Internal control mechanisms***

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

#### ***d. Training and Communication***

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

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

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



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

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

***e. Communication of irregularities or complaints / Non-Retaliation / Investigation of suspicious incidents***

EDP Group makes available a range of means for communicating irregularities (identified in Appendix I) and encourages all employees to report any type of behavior that, in good faith, they consider to be in breach of this Policy, the EDP Group Code of Ethics, the law, regulations, policies and procedures implemented by the EDP Group.

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

The management and the resolution of all whistleblowing cases at EDP are under the responsibility of exempt and impartial business areas, who must guarantee the confidentiality of the entire process, namely with regards to the protection of the identity of the whistleblower and denounced person.

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

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

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

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

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



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

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

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

When it becomes aware of situations of non-compliance or misalignment with this Policy, DCO shall:

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

DCO ensures the reporting to the EBD and the Commission for Financial Matters / Audit Committee ("CMF / CAUD") of EDP's General Supervisory Board ("GSB") of the monitoring and continuous improvement activities carried out.

***g. Audit***

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

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

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

***iv. Failure to Comply with the Group Policy and Applicable Law***

Failure to comply with this Policy will be subject to internal penalties and the appropriate disciplinary and/or legal measures.

Failure to comply with this Policy may also result in administrative and judicial liability, including fines, damages, aggravated fines, restriction of freedom, ban on the pursuit of one's activity, restriction of receipt of government loans, subsidies or incentives, loss of assets and even dissolution of the company.

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

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

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

**7. FINAL PROVISIONS**

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

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

**Appendix I – Contacts****Whistleblowing channels:**

- i. Ethics Ombudsman: <https://www.edp.com/en/contact-ethics-ombudsman>
- ii. Irregularities Communication Channel – Financial matters / Money Laundering and terrorism financing: <https://www.edp.com/en/edp/irregularities-communication-channel>
- iii. Channel for reporting harassment situations at work:  
  
Phone: +351 210 012 686  
E-mail address: [boa.conduta@edp.pt](mailto:boa.conduta@edp.pt)
- iv. Data Protection Officer: [dpo.pt@edp.com](mailto:dpo.pt@edp.com)

**Compliance Department:**

E-mail address: [compliance@edp.pt](mailto:compliance@edp.pt)  
Phone: +351 210 012 106