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**CHANGING
TOMORROW
NOW**

ETHICS OMBUDSPERSON REPORT 2020

edp

ONE
ROY



CHANGING TOMORROW NOW

At EDP, we are in the business of innovating. Our 4 decade long track record has turned us into better energy providers and pioneers of the green evolution. Change has been our driver as we deliver an agile network with more efficient, smart and sustainable solutions. As leaders in the energy transition, we see investment in renewables as an active way to engage with future generations, promoting decarbonisation in energy production and consumption. We are playing our part for a more balanced and sustainable world, one that is inclusive, diverse and humane.

We're changing tomorrow now.

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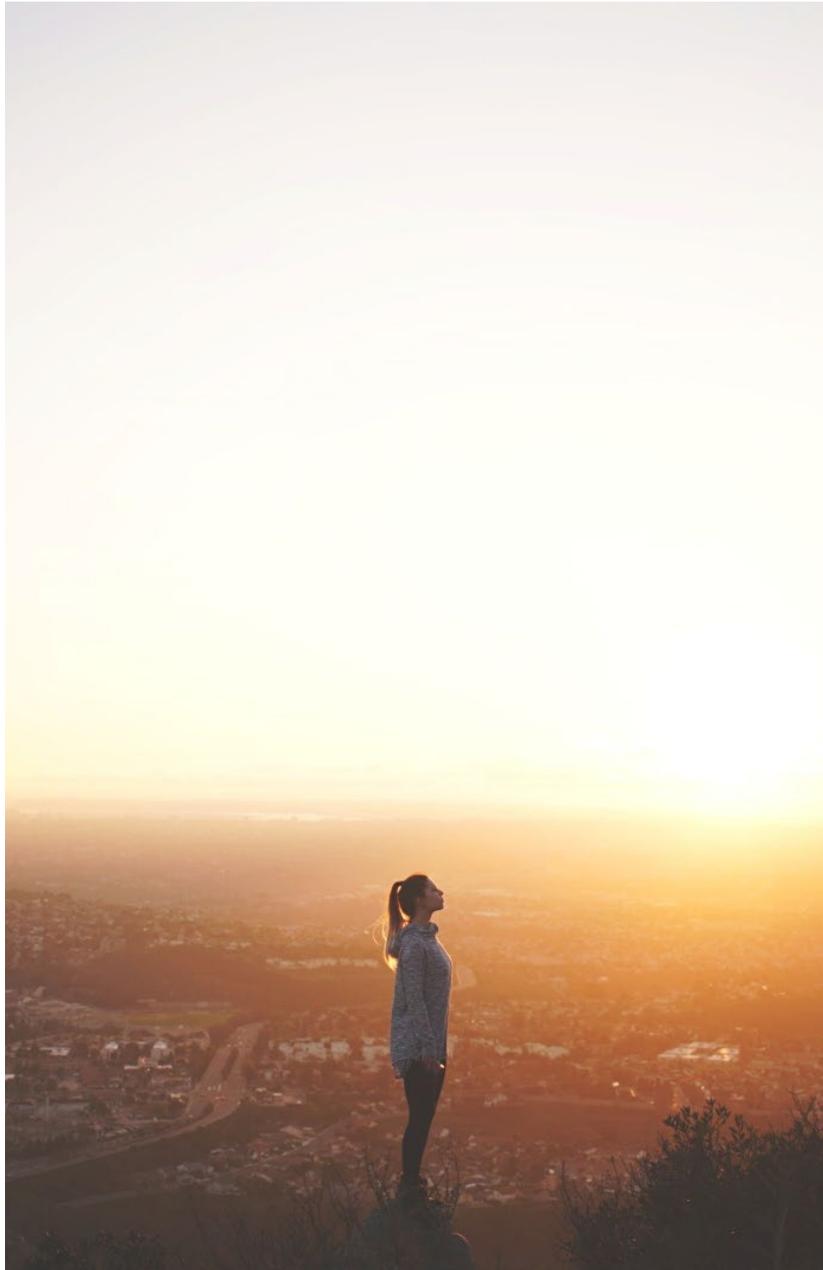
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PEOPLE PEOPLE

FROM STRIVE
TO THRIVE

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tomorrow now.**

01

A pandemic year: troubled times...with glimmers of hope

"(...) Coronavirus continues to spread worldwide, with over 100 million confirmed global cases and nearly 2.4 million deaths in almost 200 countries."

BBC News, Johns Hopkins University, Feb 21

"(...) Labour income in 2020 is estimated to have fallen by 8.3%, which represents about US\$3.7 trillion, or 4.4% of the GDP (...)."

"(...) In 2020, 8.8% of global working hours were lost compared to the 4th quarter of 2019, which equates to 255 million jobs (...)"

International Labour Organization, Monitor, Jan 2021

"(...) Every day we are offered a new opportunity, a new stage. (...)"

Encyclical "Fratelli tutti", Papa Francisco, 2020

The year 2020 was one in which the world we knew receded and in which we were brutally faced with our human fragility.

The global health crisis caused by the Covid 19 pandemic, followed by a deep economic meltdown, has completely disrupted our way of living, especially in the so-called "developed" part of the world. Moreover, in the "under-developed" part, it has exacerbated people's inequalities and suffering.

The number of people who became seriously ill, along with an overwhelming number of lives lost, has shown the fragility of the structures we had in place to prevent and treat our physical health and our safety. Also, in the economic sphere, the sharp fall in the world's wealth and its impact in the global cutback in jobs has led to the marginalisation and impoverishment of millions of people.

Within this context of tremendous social gravity, movements of international, national, and local solidarity have arisen, technological innovation and service solutions have exploded, and special attention to the human being has been rekindled in hospitals, companies, and communities.

It was, in a way, the ethical response to the pandemic.

At EDP, we tackled the pandemic by activating the business continuity plans the Company already had, and by firmly safeguarding the health and safety of our employees from several angles. Therefore, it was possible to keep 70% of staff working from home and to ensure that they continued to operate in conditions that aimed to safeguard the highest possible balance in their lives.

In these hard times, however, there are some grounds for hope: testing for the virus has increased dramatically, specific treatments for the disease have been developed, and vaccines have been tried, tested, and produced at an unprecedented rate. Economic data also suggests that many economies have already started to recover.

It was against this background of a completely atypical and very difficult year that we at EDP continued our journey to accentuate our ethical culture, certain of the importance of its solidity at this particularly serious time in all our lives.

02

Compliance with the Ethics Programme “Raising the Ethical Building @EDP”

2.1 2019-2021 – the cycle of “Ethics Management”

“In my opinion, the year 2020 marked a significant qualitative leap for the EDP Group's Ethical Building, especially due to two initiatives: the revision of the Code of Ethics and the strengthening of ethics training projects for employees.”

Jose Luis Mohedano, General Sec. of the Board of Directors, EDP Espanha, 2021

“The regular and productive contact between all the interlocutors of the different EDP geographic areas and Business Units has been a fundamental factor in aligning practices and strengthening the common vision of ethical culture in the Group”

João Paulo Mateus, Head of Compliance and Internal Control, EDP Renováveis, 2021

“Brazil poses a specific challenge given its magnitude and plurality of cultures, ethnicities, among other. We understand that this well-crafted plurality is actually one of the strengths of our ethical building and one of the greatest contributions by EDP Brasil in relation to the construction and strengthening of the ethical building of the EDP Group as a whole (...).”

Fábio William Loreti, Head of Compliance and Internal Control, EDP Brasi, 2021

EDP has taken a long and steady path in corporate ethics, characterised between 2005-2012 by the establishment of its “ethical foundations” (1st Code of Ethics, the creation of the Ethics Committee and of the Ethics Ombudsperson post, the first training courses in Ethics, etc.) and, in the period 2012-2018, in the structuring of its “ethical building” (the creation of organisational mechanisms and partnerships, the intensification of training, the extension of ethical culture to our suppliers, the setting up of external assessment of ethical performance, the strengthening of ties with all the geographic areas in which EDP operates, and so on). For the 2019-2021 cycle, the explicit introduction of an “Ethics management” philosophy was planned, articulating the reinforcement of the Company's ethical infrastructure - its foundations and ethical building - and the

intensification of an approach of "ethics of substance", which aims to make Ethics come alive in the daily life of all businesses and activities. This is the basis of the Ethics programme "Raising the Ethical Building @EDP" designed for the triennium, which in 2020 completed its 2nd year in the complex context described above, with Portugal and other geographic areas having spent many months in lockdown with most of its employees working from home. In the assessment of 2020, key initiatives were developed, as we will see, whereas in others it did not fully meet the expectations.

2.2 The new EDP Code of Ethics

"(...) This Code should provide a benchmark for the way we work, based on respect among all, compliance with existing legal provisions and focusing on our commitment to being a leading company in the energy transition. (...)"

Miguel Stilwell d'Andrade, CEO EDP, na Comunicação ao Grupo em Nov 20

"The new EDP Code provides knowledge, background, guidelines, clarifications, and examples, using a new and "refreshing" format, fully in line with what is expected from a modern and agile company such as ours."

João Paulo Mateus, Head of Compliance and Internal Control, EDP Renováveis, 2021

"The new Code of Ethics represents an important step forward in the consolidation of the EDP Group's ethical culture. Its digital format is much more accessible and practical, and its content is relevant to today's circumstances, reflecting the major changes that have been taking place in society and providing a clearer and more concrete understanding of its principles and commitments."

Jose Luis Mohedano, General Sec. of the Board of Directors, EDP Espanha, 2021

One of the core goals of the Ethics programme was the revision of the Code of Ethics at EDP. The previous Code, created in 2005 and revised in 2013, already comprised a solid and thorough document, which had provided a framework for the Company's actions in this field for almost two decades. However, the profound evolution of the Group's activity in recent years, together with the accentuation of the public importance of certain issues related to Ethics or in its "vicinity", made updating the document advisable. A broad revision project was thus developed which, based on internal analyses and both national and international benchmarking, relied on the involvement of the organisation, both in Portugal and in the geographic areas in which the Company operates, and which established that the new Code should:

- Express a strong connection to EDP's identity
- Convey a greater relationship between Ethics and the reality of the business context
- Incorporate, or reinforce, guidance on current issues such as Harassment, Money Laundering and Terrorism Financing, Energy Transition, Digital Revolution, among others
- Use plain language
- Ensure a digital delivery of the document
- Facilitate the use of communication channels for reporting potentially ethical issues
- Allow easy access to documents related to the issues addressed in the document
- Be useful and educational
- Be supported by strong communication, followed by training aimed at better understanding and assimilation.

From mid-2019 to mid-2020 a document was thus constructed in which, revolving round the four main "corporate identity traits" recognised in the Company, twenty-two ethical themes were listed that are considered the most relevant to be transmitted to all stakeholders as "the way we work at EDP". Just as the name the new Code of Ethics has taken, it is "our energy", it is the force that moves us in a certain direction.

In addition to the content of the document, special attention was given to the form of the new Code: from the well thought-out and plain language to the illustration of behaviours with practical examples from everyday life. And, from an appealing layout in written format, to a modern and interactive digital edition, accessible to all employees.

The aim of making the Code of Ethics useful and educational was addressed by including within the main document, the key related records, the reporting channels, the governance model for Ethics across the Group and also a description of the management process for potentially ethical queries.

The new Code was approved by the General Supervisory Board on 24 September and announced by the EDP CEO on 19 November to all employees and made public on the website www.edp.com as of that date.

Having a strong, comprehensive, modern, and accessible Code of Ethics was one of the main aims of our action programme. In addition to mirroring our joint action, making it a benchmark for the behaviour of the Group's employees is now the great challenge facing all the Company's leaders, and indeed all of us who work for it.

2.3 The challenge of training in Ethics

"(...) In recent years training on ethics and compliance has been improved and more proximity has been sought with employees in general in order to make it clear that compliance results depend on everyone doing their best in the construction and strengthening of the Ethical Building (...)"

Fábio William Loreti, Head of Compliance and Internal Control, EDP Brasil, 2021

"Starting from a strengthened base, the restructuring of training and communication has allowed a greater reach and increased capacity for internalising ethical issues throughout the organisation."

João Paulo Mateus, Head of Compliance and Internal Control, EDP Renováveis, 2021

Within the framework of the Transversal Training Model in Ethics approved by the Executive Board of Directors in 2019, important steps were taken in 2020 in an attempt to meet the "Guiding Principles" established at that time, with emphasis on the principles of "Interactive training", "Ever-present training" and "Digital-based training".

It is therefore worth highlighting three important training sessions developed and/or carried out this year, which took place over twelve months, and which are mentioned below:

- "Ethics is Value: within me, within society and within EDP", which replaced the previous e-learning training for all employees, including those in Brazil, Spain and EDP Renováveis. This session aims at a general approach to the fundamentals of Ethics and how it has been reflected at EDP.
- "Ethics is Value: 15 years of EDP Ethics": which celebrates a decade and a half of consistent work on corporate ethics across the Group, recounting the history of the main milestones on this path to all employees, it being particularly important to support the induction of new employees.
- "Ethics is Value: Let us live the Code of Ethics": which supports the publicising, understanding and awareness of the new Code of Ethics.

Overall, in 2020, within the scope of the training initiatives promoted by the Ombudsperson's Office, more than 4,300 hours of training were provided (35% more than in the previous year) with respective execution rates oscillating between 50% and 65%, depending on the time the sessions were provided.

As in the previous year, a face-to-face "Ethics Talk" session was also organised, even before the pandemic broke out, dedicated to the topic "Technology and Economy in the 21st Century".

And, during the worst period of the "beginning" of lockdown, in March and April, the Ombudsperson's Office sent to its colleagues in Portugal, through Workplace, regular messages of encouragement, inspirational texts, called "Moments of Ethics".

As a complement to the training itself, and to support its construction, the Ombudsperson's Office organized, with the support of EDP University and the Católica Porto Business School, an Ethics documentary nucleus consisting of the systematic collection and analysis of information on matters of Ethics from the competent international and national entities, which is referred to as RADAR. This hub will also become a pillar of knowledge to be included in the University's ULearn platform in the field of "Ethics" (created in 2020 and already made available in 2021), and which allows EDP employees to use training content in this area on demand.

It is acknowledged that training is one of the main tools to prepare and give confidence to employees with regard to Ethics. Good planning, the quality of the contents and appropriate training formats are essential to the success of such initiatives. It is on this groundwork that we have been working, with splendid support from the EDP University, and it is also from this perspective that we have prepared the 2021 training programme which, among other matters, will be fundamental to the apprehension of the new Code of Ethics.

2.4 EDP's ethical performance from an external perspective

"(...) As a company that has applied to the World's Most Ethical Companies recognition, you have already demonstrated your commitment to business integrity. You understand the benefits of fostering a culture focused on Ethics and Compliance. (...)"

Ethics Quotient Analytical Scorecard, Overview, Ethisphere Institute, 2021

In 2020 EDP was once again recognised, for the ninth consecutive year, as one of the "world's most ethical companies", alongside 136 companies from 22 countries. We continue to be the only Portuguese company to be recognised in this index and one of only nine Energy & Utilities companies worldwide to be distinguished.

This external evaluation of the maturity of our management systems with regard to Ethics and Compliance, carried out by the Ethisphere Institute, is of great importance to the Company's image but also, and especially, for the continued strengthening of the ethical culture in and of the EDP Group. On the one hand, it reinforces our image among national and international stakeholders with regard to the reputation and excellence of our practices in these issues - nowadays, as is generally known, the determining of the value of companies goes far beyond their economic-financial profitability, and is increasingly integrating its intangible values, namely in terms of transparency, responsibility, and the integrity with which they operate in their businesses. On the other hand, the task of presenting our application is also very important. This requires a very serious voluntary preparation, which implies the setting of goals and annual improvement initiatives, as the demand is increasingly greater each year. Moreover, to a certain extent, the application also allows us to have a more integrated vision of all the aspects that contribute to a standard of excellence in our way of doing business, across the various countries in which we operate, paying special attention to each and every one of the factors that generate trust. This moment of submission to the appraisal of a certified entity such as the Ethisphere Institute is without a doubt an important moment of reflection and preparation for action in this field.

This year, as in previous years, our performance in the "Ethics and Compliance Programme", in the "Impact on the Environment and Society", in "Leadership and Reputation", in "Ethical Culture" and in "Corporate Governance" was analysed. We have therefore filled out, under oath, a questionnaire containing more than 200 questions, and we have attached, as evidence, numerous documents attesting our assertions. This work is carried out, as all the others within the scope of the Ethics programme, the whole organisation being strongly involved, including the various geographic areas, whose performance also very positively contributes to our final assessment.

2.5 Our relationship with our surroundings

"(...) each of us can learn something from others. No one is useless, and no one is expendable" (...)"

Encyclical "Fratelli tutti", Papa Francisco, 2020

Throughout the year, and despite a context of conditioned face-to-face relationships, we have promoted our partnerships with associates and other entities that have been a source of knowledge, sharing and consistent support for our initiatives, and whom we have also supported. In this regard we highlight:

- The renewal of the Chair of "Ethics in Business and Society" which was established over a decade ago with the AESE Business School, with the redefinition of objectives and initiatives aimed at promoting the culture and teaching of Ethics both at EDP and in the AESE community.
- The continuity of the collaboration protocol with the Católica Porto Business School, which has also been in place for many years, and which has allowed us to fruitfully share information and knowledge about Ethics, thus greatly complementing our internal initiatives.
- Participation in the Ethics Forum regularly organised by Católica Porto Business School.
- The Ethics Ombudsperson's participation in the conference Morning Insights - Ethics II, organised by the Data Science Portuguese Association.
- The participation of the Ethics Ombudsperson in a conference to the students of the 2020 AESE MBA on "EDP Ethical Building: history and challenges."
- The Ethics Ombudsperson's participation in a European Executive Roundtable of the Business Ethics Leadership Alliance (BELA, Ethisphere Institute) on how EDP tackled the pandemic.
- The presentation of the EDP Ethics Programme to the Company Eletricidade de Moçambique (EDM) and the appraisal, at EDM's request, of its Corporate Governance Policy.
- The collaboration of the Ethics Ombudsperson Office with the "VER Portal", through the regular publishing of articles in their newsletter.

03

Ethics governance at EDP - the organization's consolidation in progress

"(...) Since ethics need to be managed in a structured manner, ethics governance structures dedicated to the ethics -related dimensions of the organization need to be designed and implemented. (...). The desired outcome of any ethics governance and management initiative is a strong ethical culture. (...)"

Ethics Risk Handbook, The Ethics Institute, 2016

The core organisational entities in the governance model for Ethics at EDP - the Group's Ethics Committee and the Corporate Governance and Sustainability Committee (CGSC) of the General and Supervisory Board - continued to adequately monitor throughout the year, both regarding the implementation of the approved Ethics programme and to the management of queries made through the competent channels, namely the Ethics Portal. There were 4 meetings of the Ethics Committee, organised by the Ethics Ombudsperson, and 4 meetings of the CGSC organised by its own secretariat.

The Ethics Ombudsperson also participated in the regular meetings of the Ethics Committees of EDP Renováveis and EDP Brasil, in which potentially ethical queries received through the respective channels in the various geographic areas were mainly analysed.

The Ethics Ombudsperson has been supported in her duties by appointed contacts in EDP Espanha, EDP Renováveis and EDP Brasil, allowing the EDP Ethics programme to be implemented with contributions from these countries, by sharing points of view and information, and by expediting the processing of certain queries made through the ethics channels whenever and wherever necessary.

In Portugal and Spain, support for the preliminary analysis of complaints has been provided by internal teams from the main companies involved in these queries, with the more detailed investigation work being requested, where necessary, from EDP's Internal Audit Department.

The Office of the Ethics Ombudsperson (EOO), a structure within the Corporate Centre managed by the Ethics Ombudsperson, is responsible for conceiving and developing the Ethics programme initiatives, which are carried out in collaboration with various Company teams, and for supporting the work of the Ombudsperson in organising and holding meetings of the Ethics Committee and the CGSC.

The development and implementation of the Ethics and Compliance Programme which supports the annual candidacy for the recognition of "World's Most Ethical Companies" by the Ethisphere Institute, has been ensured by a Work Group coordinated by the EOO and by the Group's Compliance Department and includes several areas of the Corporate Centre with activities on the "border line" of Ethics.

04

Management of queries directed at the Ethics channels

"Speaking up is hard to do. (...). In fact, research suggests that most people tend not to act, and then rationalize their inaction. (...)"

Speak Up. Harvard Business Review, 2019

"(...) A culture of active listening is vital to any chance of being an ethical company. (...)"

"Building Back – Ethically", Dr. Ian Peters, Director Institute of Business Ethics, 2021

"To effectively contribute to the Organization's Integrity Program, it is essential to ensure access to an independent and confidential channel that allows employees and other stakeholders to report ethical issues freely (...)"

Marcos Campos, Head of Internal Audit, EDP Brasil, 2021

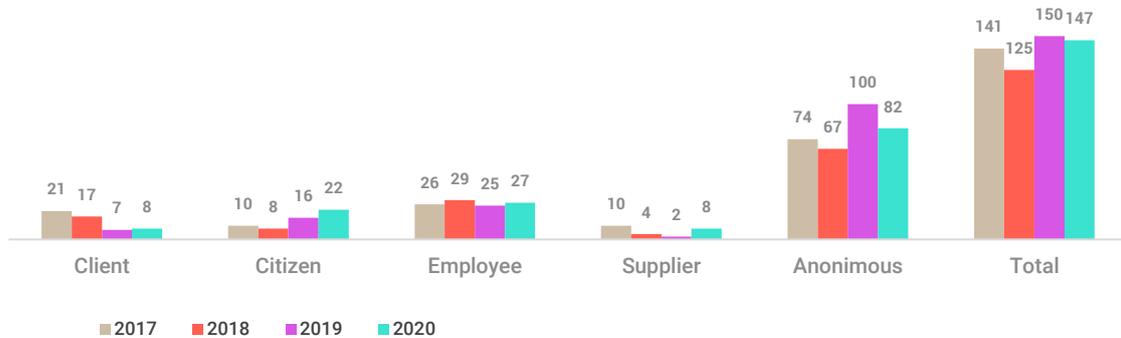
The management of queries received through the proper channels was carried out in the various countries in accordance with the stages envisaged in the respective processes.

The analysis of the evolution of the management activity of this type of contact in 2020 can be characterised as follows:

- Over the year, a total of 464 queries were recorded in the various channels available at EDP, i.e., 124 less than the previous year (-21%)
- Of the total queries received, 147 were referred to the Ethics Committee, i.e., 31.7% of the total, which means an increase in that percentage compared to the previous year (25.6% in 2019). The remaining queries were forwarded and dealt with in the various business units, since no ethical reasons were considered at their root

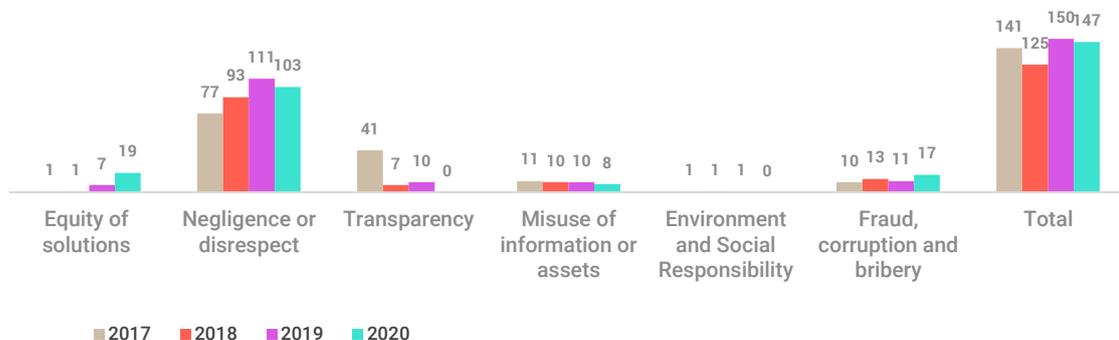
- Anonymous complaints, which are recorded mainly at EDP Brasil, show a slight decrease in 2020 (-18%). If we dismiss this source, most queries come from clients and citizens.

Complaints assessed by the Ethics Committee, according to source, 4 years (#)



- As for the subject regarding which claimants address the specific channels for this purpose, the primary issue - and according to the typologies provided - continues to be "Negligence and Disrespect" which represented in 2020, 70% of the total queries analysed by the Ethics Committee. In the subject "Fraud, Corruption and Bribery" the 17 complaints reported were received by the Ethics Channel at EDP Brasil, and there they were categorised as incidents of "Improper payment or receipt - corruption and bribery", and by the end of 2020 only 4 were considered to stand grounds, with two still under investigation.

Complaints assessed by the Ethics Committee, according to topic – 4 years (#)



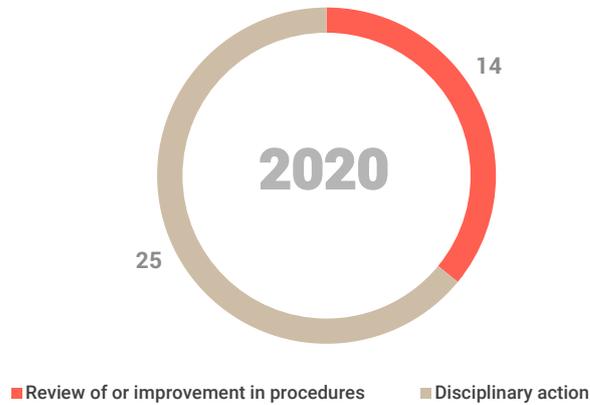
- The volume of complaints processed and initiated in 2020 shows an identical volume of work in the two years under review. However, the number of cases concluded in 2020 was much higher than in the previous year, which had an impact on the number of complaints that went forward to 2021, which was lower compared to the previous year.

Complaints reviewed by the Ethics Committee:

	TRANSITED COMPLAINTS FROM THE PREVIOUS YEAR	OPEN THROUGHOUT THE YEAR	CLOSED THROUGHOUT THE YEAR	COMPLAINTS TRANSITING TO THE FOLLOWING YEAR
2019	60	150	94	58
2020	58	147	169	36

- The actions determined by the Ethics Committee over 2020 were only related to the revision or improvement of procedures and disciplinary action.

Course of Action set by the Ethics Committee (#)



As an overall conclusion on this activity it can be said that:

- The process of managing queries delivered through the Ethics channels available at EDP followed the path set out in the respective processes and procedures, with full operation of the entities created for this purpose;
- the volume of queries classified as of an ethical nature decreased in 2020, continuing to be relatively small when compared to the scale of EDP;
- The experience of the analysis of these queries in general, and of the dynamics of the Ethics Committee meetings in particular, has allowed important lessons to be drawn for the improvement of procedures or reinforcement of training actions, which is, moreover, one of the important consequences that we seek to take from this process.

05

Ethical imperatives in the coming future

"(...) There has simply never been a period of such intense public scrutiny of businesses practices. Nor has there been such a strong public expectation that businesses will operate to the highest ethical standards. (...)".

"Building Back – Ethically", Dr. Ian Peters, Director Institute of Business Ethics, 2021

"Ethical drivers (Integrity, Purpose, Dependability) are 3x more important to company trust than competence (76% versus 24%)"

Edelman Trust Barometer 2020, Edelman Global Report, 2021

We are aware that the pandemic emergency has accelerated the major trends that had already been felt in previous years, with particular emphasis to the profound changes in the labour market, the emergence of a more supported economy in e-commerce with new consumer behaviours, and an explosion of day-to-day living solutions based on automation and artificial intelligence. This evolution entails a redesign of human life in all areas of society and brings with it natural opportunities; however, it will also bring threats, which we must all be aware of. And also because of this, theoretical reflections and various studies that have emerged in the meantime, point to a much greater demand regarding business practices in matters of integrity, responsibility, and transparency.

Thus, our work on consolidating ethical culture and the importance of further raising the standards of our ethical performance across the Company, are inevitable in the post-pandemic future.

From the viewpoint of trends in Ethics, and in Compliance, we should consider our work plans, namely:

- the importance of addressing business risk management - risk management being fundamental at a time that is known to remain uncertain - with a holistic perspective, to ensure that all angles of analysis and mitigating action are considered

- that a robust ESG (Environment, Social & Governance) policy is central to maintaining a solid and reliable Company and decisively contributes to a sustainable future
- that changes in the labour market caused by the evolution of society and the economy require fair actions that are mindful of the centrality of the human being, in areas such as requalifying skills, ensuring fairness and inclusion for all, respect for diversity, a hybrid regime at work with balance, maintaining preventive and support structures for health, whether physical or mental, in short, ensuring high levels of wellbeing for our entire population
- the need to contribute towards preparing people for this new era, so that they are aware, competent, and happy, ensuring continuous training in Ethics & Compliance, and paying particular attention to the importance of being able to count on leaders who are deeply committed to the Company's ethical principles
- the ability to involve third parties in our ethical actions, safeguarding risks, demanding responsibility, and commitment, but also sharing the value created with their contribution to the Company's business.

All these issues - and certainly many others - will be part of our action plans within the Company in the short and medium term, namely in issues of Ethics, and which we promise to accomplish.

06

Our acknowledgements

The result of the work carried out in 2020 is a result of all those who believed in us, whether in the trust they placed in us or in the contributions that enriched our actions; it is also due to those who sought our listening and, so often, our understanding. Our acknowledgement is thus expressed to a great number of people, of which we highlight:

- The Chairman of the General and Supervisory Board and the CGSC, for the trust and encouragement they have always given us to do more and better
- The Executive Board of Directors of EDP, and its two Executive Chairmen in office in 2020, also for the trust and confidence that they have always given us, and which has allowed for the bold path that we have taken, especially in the review of the new Code of Ethics
- Our colleagues at the Corporate Centre and in the Business Units in all countries, without exception - whose testimonies I echo in some chapters of this Report - for the expertise and commitment with which they complemented our work
- All our partners, for helping us to do what we had to do well, in a generous sharing of knowledge
- The team of the Ethics Ombudsperson's Office, whom the pandemic, the lockdown, the social isolation, the distance working, in short, such a hard year, have not detracted from the excellence with which they always face their responsibilities
- To all those who have sought the comfort of a single word, clarification, or wise judgement from the Ethics Ombudsperson, and from the Group's ethics channels in general, to enable us to firmly pursue healthy behaviour within our Company.

Thank you all so very much.

Lisbon, 14th April 2021

Manuela Silva

Ethics Ombudsperson

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