



Transactions with Related Parties Policy

This is an unofficial translation of the Transaction with Related Parties Policy prepared for information purposes only. In the case of any discrepancy between this translation and the Portuguese version of the Policy, the Portuguese version will prevail.

CONTENTS

1. VERSION HISTORY.....	3
2. BACKGROUND.....	3
3. PURPOSE.....	4
4. SCOPE.....	5
5. REFERENCES.....	5
6. TERMS AND DEFINITIONS.....	5
7. PRINCIPLES RELATED TO TRANSACTIONS WITH RELATED PARTIES.....	8
8. REQUIREMENTS FOR PERFORMING TRANSACTIONS WITH RELATED PARTIES.....	8
9. TRANSACTIONS AND CONFLICTS OF INTERESTS.....	9
10. TRANSACTION WITH RELATED PARTIES REPORTING:.....	9
11. PRIOR OPINION OF THE GSB ON TRANSACTIONS OF SIGNIFICANT IMPORTANCE.....	13
12. DISCLOSURE OF TRANSACTIONS WITH RELATED PARTIES AND TRANSACTIONS OF SIGNIFICANT IMPORTANCE.....	13
13. RESPONSIBILITIES IN THE TRANSACTIONS WITH RELATED PARTIES MANAGEMENT SYSTEM.....	14
14. COMMUNICATION OF THE POLICY AND TRAINING COURSES.....	16
15. COMPLAINTS AND/OR COMMUNICATION OF IRREGULARITIES (WHISTLEBLOWING).....	16
16. MONITORING AND CONTINUOUS IMPROVEMENT.....	17
17. NON-COMPLIANCE.....	17
18. FINAL PROVISIONS.....	18

1. VERSION HISTORY

Version	Approval date	Prepared by	Approved by	Comments
1	16/10/2008	L&G/GACGS	CGS	Initial Issue ¹
2	29/07/2010	L&G/GACGS	CGS	Review ²
3	29/10/2015	L&G/GACGS	CGS	Review ²
4	25/03/2021	L&G /C&IC/GACGS	CAE/CGS	Review
5	26/01/2023	L&G/ C&IC/ GACGS	CAE/CGS	Review
6	04/05/2023	L&G/ C&IC	CAE/CGS	Review

¹ – Initially referred to as the "Framework for handling conflicts of interest"

² – Called "*Regulation on Conflicts of Interest and Business between EDP Related Parties*"

2. BACKGROUND

In 2008, with the approval of the "*Framework for handling conflicts of interest*", the General and Supervisory Board ("GSB") of EDP – Energias de Portugal, S.A. ("EDP" or "Company") took on a pioneering role in the creation of an internal mechanism for preventing, identifying and handling potential relevant corporate conflicts of interest, a topic that was only expressly enshrined in the Corporate Governance Code of the Securities Market Commission (CMVM) at the beginning of 2010.

Following the commitment to align with the best corporate governance practices, the GSB approved in 2010 the "*Regulation on Conflicts of Interest and Business between EDP Related Parties*" (the "Regulation"), which replaced that first regulation and was then revised in 2015.

On the other hand, market rules and accounting standards, namely the International Accounting Standard (IAS) 24, foresee duties of conduct and of disclosure on transactions made with certain persons or entities, considered related parties by virtue of the special commercial, shareholder or other relationships that exist between EDP and those persons or entities. The essential aim of these rules is (i) to safeguard the interests of the Company in situations of potential conflict of interest with the interests of persons or entities with the power to influence its management, either directly or indirectly, or to derive benefit from those management decisions; and (ii) to ensure that the financial statements and market disclosure documents describe the impact of transactions with related parties on the Company's financial position and results.

In this context, the Executive Board of Directors of EDP (the "EBD") approved, in 2010, Service Order 03/2010/CAE of 17 May (the "SO"), through which it established the mechanisms of identification, reporting and action by EDP Group employees regarding transactions with related parties, in order to

inhibit the performance of transactions in situations of conflict of interest, as well as to ensure the correct identification and disclosure of transactions with related parties.

The application of the principles and rules established in the Regulation and the SO enabled the identification and disclosure of transactions with related parties and the respective internal reporting and inhibition of transactions in situations of conflict of interest. It has also allowed the GSB to issue a well-reasoned and qualified opinion on conflicts of interest, when assessing management reports and accounts.

Nevertheless, and taking into account:

- (i) the publication of Law no. 50/2020 of 25 August transposing the Shareholder Rights Directive II into Portuguese law, as well as the Law no. 99-A/2021 of 31 December, which amended the Portuguese Securities Code;
- (ii) the 2020 revision of the Portuguese Corporate Governance Institute's (the "IPCG") Corporate Governance Code;
- (iii) the need to ensure that EDP continuously monitors best practices and developments in applicable legislation and regulations in its various fields of activity;
- (iv) the need to have a solid and autonomous procedure for the identification, treatment, reporting and eventual disclosure of transactions with related parties, in parallel with the existence and need for compliance, by all EDP Group employees, with internal policies on the prevention of conflicts of interest and integrity;
- (v) the finding that the issues related to transactions with related parties, besides its material nature, also assume a procedural dimension, which requires a clear definition of the procedures to be followed and the respective responsibilities;

following the validity of the Regulation and the OS, this Transactions with Related Parties Policy of EDP (the "Policy") was drawn up.

3. PURPOSE

This Policy aims to establish the general principles, the requirements, procedures and responsibilities regarding the identification, execution, reporting, disclosure and monitoring of Transactions with Related Parties.

Without prejudice to other internal policies and regulations on conflicts of interest and integrity of the EDP Group, this Policy also aims to contribute to the prevention and detection of possible situations of Conflicts of Interest, to the promotion of ethics and integrity and to compliance with legislation and best practices in the development of the business of the EDP Group.

4. SCOPE

This Policy applies to EDP, as well as to the Companies over which EDP exercises control, notably EDP Renováveis, S.A. (“EDP Renewables”), EDP España, S.A. (“EDP España”) and EDP - Energias do Brasil, S.A. (“EDP Brasil”), with the necessary local adaptations. This Policy also applies to Fundação EDP, Fundación EDP and Instituto EDP – which, for the purposes of this Policy, will be considered as part of the EDP Group.

The Employees, members of the management and supervisory bodies and Third Parties must fully comply with this Policy, without prejudice to the necessary local adaptations, depending on the legal and regulatory context in force.

EDP's representatives on the boards of directors of controlled companies, whether based in Portugal or abroad, are instructed to adopt the measures and perform the acts necessary to transpose this Policy.

In addition, EDP's representatives in joint ventures or in companies in which EDP does not hold a controlling position shall always ensure compliance with the provisions of this Policy in the performance of their roles and shall encourage, as far as possible, the application of its principles or of similar principles in those companies, namely by promoting the development of specific policies and regulations for that purpose.

5. REFERENCES

- Portuguese Companies Code;
- Portuguese Securities Code;
- International Accounting Standard 24 Related Party Disclosures (IAS 24);
- CMVM Regulation no. 4/2013 Corporate Governance;
- Corporate Governance Code of the Portuguese Corporate Governance Institute (IPCG);
- ISO 37001 - Anti-Bribery Management Systems;
- EDP Group Integrity Policy;
- EDP Group Code of Ethics.

6. TERMS AND DEFINITIONS

The terms used in this Policy shall have the meaning set out below, purely for the purpose of interpreting this Policy, regardless of whether it is used in singular or plural:

Employee: A natural person employed by any of the entities of the EDP Group, on a permanent or temporary basis under an employment or internship contract, including equivalent or similar situations.

Conflict of interests: Situation in which the financial or non-financial ends or benefits that someone aims to secure or obtain for themselves or for third parties through an action are likely to interfere with compliance with the duties of impartiality, objectivity and observance of the Code of Ethics to which that person is bound in the exercise of their duties, or result in damage to the interests pursued by the EDP Group, including:

- (i) Apparent Conflict of Interests: a situation likely to be interpreted as a conflict of interests, although it may not in fact exist.
- (ii) Potential Conflict of Interests: a conflict of interests situation which may arise.
- (iii) Real Conflict of Interests: an actual conflict of interests situation.

Control: Means the power to determine or influence, directly or indirectly, management and management policies, or to manage financial and operating policies, notably by virtue of:

- (i) Holding, directly or indirectly, more than half of the voting rights;
- (ii) The existence of an agreement allowing the exercise of more than half of the voting rights representing the share capital;
- (iii) Possibility to manage the entity's financial and operational policies by virtue of a statutory provision or a contract;
- (iv) The capacity to appoint or dismiss the majority of the members of the executive or supervisory boards.

Joint control: This refers to contractually agreed sharing of control of an economic activity, and exists only when the strategic financial and operating decisions related to the activity require the unanimous consent of the parties sharing control.

Decision makers: All natural persons who, by virtue of the exercise of their functions, have direct or indirect authority and responsibility for the planning, direction and control of activities in the EDP Group shall be considered decision makers, under the terms described below:

- (i) The members of EDP's corporate bodies and its Subsidiaries Companies;
- (ii) EDP Group employees classified in job grades from 20 to 25 regardless of the EDP Group company with which they have a contractual relationship or perform duties;
- (iii) Whenever the decision maker defined in (ii) identifies, as decision makers, other Group employees, with a job grade lower than 20, to whom he/she has attributed identical competencies;
- (iv) Whenever the EBD expressly qualifies EDP Group employees as decision-makers, indicating the respective scope of activity.

Family members: correspond to the close members of a person's family and are those family members that are expected to influence or be influenced by that person in their businesses with the EDP Group, including:

- (i) the children, spouse or cohabiting partners of the person concerned;
- (ii) the children of the spouse or of the cohabiting partner of the person concerned;
- (iii) the dependents of the person concerned or of their spouse or cohabiting partner.

EDP Group: the group of companies formed by EDP and by its controlled companies, as in the definition of "Control", together with Fundação EDP, Fundación EDP and Instituto EDP.

Significant influence: the capacity to participate in decision-making on the financial and operating policies of a given entity, without exercising Control over these policies; the EDP Group is considered to exert "significant influence" over an entity if the group holds at least 20% of its voting rights (calculated according to the provisions of the Portuguese Securities Code or to the Portuguese Companies Code, as applicable).

Business of Significant Importance: legal business that may give rise to a Conflict of Interests between the parties involved, relevant to the pursuit of EDP Group's interests, and which, under the terms of the applicable internal rules, requires a prior opinion from the GSB.

EDP's corporate bodies: the General Shareholders' Meeting, the EBD, the GSB and the Statutory Auditor.

Related parties: the following are considered related parties of EDP Group:

- a) Individuals and their family members who:
 - (i) Have control or joint control of EDP;
 - (ii) Have Significant Influence over EDP; or
 - (iii) Are a Decision-Maker.
- b) Legal Entities:
 - (i) Any EDP Group entity, *i.e.*, any entity subject to Control by EDP;
 - (ii) Any entity over which EDP or any company controlled by EDP exercises Significant Influence;
 - (iii) The Companies jointly controlled by EDP and other entities, notably joint ventures in which the EDP Group holds Joint Control;
 - (iv) Both entities are joint ventures of the same third party
 - (v) Any entity that is a retirement benefit plan in favour of EDP Group Employees or any entity that is a Related Party of the EDP Group;
 - (vi) The entities that represent a common venture of the third-party entity and the other entity is an associate of the third party entity;
 - (vii) Any entity that, directly or indirectly, is under the Control or is Jointly Controlled by the Decision Maker or over which he exercises Significant Influence;

- (viii) Any person identified in (a)(i) who has Significant Influence over the entity or is a member of the management of the entity (or of a parent-company of the entity); or
- (ix) Any benefit fund or plan, such as pensions, other retirement benefits, life insurance and medical care, for the benefit of employees of the EDP Group.

Controlled Companies: entities in which EDP has the power, directly or indirectly, to determine or influence management and management policies or to manage financial and operating policies, namely by virtue of the factors mentioned in the definition of "Control".

Third Party: any natural or legal person who, although not an employee, takes part in the activities or represents any entity of the EDP Group, directly or indirectly, as a service provider, supplier or even assumes the role of business partner or customer of any Group company, and that assumes the nature of a Related Party.

Transaction: means a legal act or business or any other act that implies a transfer of resources, services or obligations between two or more people or other entities, regardless of whether or not there is a price debt.

7. PRINCIPLES RELATED TO TRANSACTIONS WITH RELATED PARTIES

- 7.1. Transactions with Related Parties must be carried out within the scope of the day-to-day business and justified by the interest of the EDP Group Company involved, and must be carried out under market conditions.
- 7.2. Transactions with Related Parties within the scope of the EDP Group are subject to principles of transparency, reporting, adequate monitoring and, when applicable, disclosure.
- 7.3. All Employees must avoid situations of Conflict of Interest and whenever they are in apparent, potential or real position of conflict of interests related to any Transactions that EDP Group interview, must communicate the conflict under the terms of the "Prevention and Management of Conflicts of Interest Procedure" and refrain from performing any act or taking any decision in relation to which the conflict is manifest.

8. REQUIREMENTS FOR PERFORMING TRANSACTIONS WITH RELATED PARTIES

- 8.1. All potential Transactions with Related Parties should be subject to prior consideration to verify whether they will be implemented in compliance with the requirements referred to in the preceding number and, whenever possible, comparative assessments should be made with other comparable transactions.
- 8.2. For the purposes of the preceding number, each business unit must analyse the transactions previously carried out with the same counterparty, as well as analyse the transactions performed

with non-related parties that may constitute the same type of business and have similar characteristics, context and values.

- 8.3. The previous analyses procedures above referred and the decision-making process regarding the execution of the Transactions with Related Parties must be duly documented and the minutes or other supporting document must include reference of the parties involved and the procedures adopted in the selection of the counterparty and the reasons justifying the execution of the Transaction in question.

9. TRANSACTIONS AND CONFLICTS OF INTERESTS

- 9.1. No EDP Group Decision Maker may intervene in the decision, authorization or execution of a Transaction in respect of which he/she or a relative is a Related Party, nor in Transactions in respect of which he/she is, for any other reason, in a Conflict of Interest.
- 9.2. In the situations described in the previous paragraph, the approval and/or performance of Transactions with Related Parties to the EDP Group's decision makers must:
- a) in the cases in which competence is delegated or in any way functionally attributed to an EDP Group Decision Maker, the transaction must be assessed and carried out by an equivalent or higher member of the EDP Group hierarchy who ensures impartiality in the decision-making process regarding the execution of the Transaction in question;
 - b) in cases where the competence falls to the management board of EDP or one of its Controlled Companies or any of its members, the transaction must be analysed without the intervention of the decision maker involved in the Conflict of Interests, unless the management body of the Controlled Company is, in its majority, in a situation of Conflict of Interests, in which case the Transaction must be assessed by the EBD (also without the intervention of the members who are in a situation of Conflict of Interests).

10. TRANSACTION WITH RELATED PARTIES REPORTING

10.1. Reporting and supporting Tool

As part of its responsibilities in the development of control mechanisms for compliance with the principles and rules set out in this Policy, particularly with regard to centralizing the identification of Related Parties and reporting of Transactions with Related Parties, the EDP Group provides the Transactions with Related Parties (TRP) tool.

This tool establishes the procedures for capturing and characterizing the Related Parties whose identification and monitoring are fundamental to ensure the completeness of the information reported.

The identification of the Related Parties is shared with Consolidation, IFRS Reporting and Tax and with the business units and Controlled Companies, as applicable, so that all Transactions with Related Parties are identified and flagged.

The procedures for identifying Related Parties and reporting on Transactions with Related Party are set out by each party in this chapter and are detailed in the EDP process manual.

10.2. Transactions with Related Parties reporting procedures applicable to the business units and Controlled Companies

Whenever applicable, the Decision Makers of EDP Group entities, or other users duly empowered to report Transactions with Related Parties, must transmit to Legal & Governance all relevant information on the Transactions carried out or to be carried out with Related Parties, including those relating to *Memorandum of Understanding*, partnerships or other forms of cooperation with Related Parties, regardless of the associated value.

The information to be provided under the previous paragraph shall contain, at least, the elements mentioned in paragraph c), number 3 of item 10.5, as well as all other supporting documents to these elements and the procedure adopted.

The reporting obligations set forth in the preceding paragraphs do not apply to Transactions which consist in obtaining financing from financial entities or other Transactions carried out by financial entities related to the granting of credit to the Decision Makers themselves, provided that they are exclusively for personal purposes and granted under market conditions available to the general public. The following are considered granted for personal purposes: housing loans, lines of credit for consumption, and other credit transactions that have a pre-established repayment term and are not intended to obtain special advantages for either party.

10.3. Transactions with Related Parties reporting procedures applicable to Legal & Governance Global Unit

Legal & Governance ensures the sending of information to the EBD, on a quarterly basis, of the Transactions reported under the following terms:

- a) Any Transaction with Related Parties with a cumulative annual cost of at least EUR 75,000; and/or
- b) Any Transaction with Related Parties, even if of a value less than that referred to in the preceding sub-paragraph, which is not carried out under normal market conditions for similar transactions or that have material relevance.

10.4. Transactions with Related Parties reporting procedures applicable to Consolidation, IFRS Reporting and Tax Global Unit

Transactions with Related Parties reporting procedures applicable to Consolidation, IFRS Reporting and Tax relate exclusively to the disclosure of the note in the Annex to the Financial Statements of the EDP Group.

Based on the information from identified Related Parties, Consolidation, IFRS Reporting and Tax systematizes the total balances of Transactions that occurred in the period under analysis whose information is recorded in the economic-financial system.

10.5. EBD reporting to the Financial Matters Committee/Audit Committee (FMC/AUDC)

1. The EBD must inform the FMC/AUDC, within 20 days of the end of each quarter, on transactions performed in the respective period that:
 - a) Have an economic value greater than EUR 5 million or whose cumulative annual amount exceeds this value, and/or
 - b) They need to be reported in the management report, due to their material relevance, or because they were concluded outside normal market conditions for similar transactions, and/or
 - c) Are *Memorandum of Understanding*, partnerships or other forms of cooperation with Related Parties, regardless of the associated value.
2. In addition to sending the information required by IAS 24 prior to or, if this is not possible, immediately after conclusion, the EBD will inform the FMC/AUDC of transactions, including any amendments to existing contracts, between EDP and Controlled Companies, provided that the value of the operation is equal to or greater than:
 - a) EUR 75 million, for shareholder loans and standard loans;
 - b) EUR 75 million in the case of the purchase, sale, trading or supply of electricity or natural gas and related services and products;
 - c) EUR 5 million for all other transactions.
3. The information to be provided to the FMC/AUDC in accordance with paragraph (a) of item 10.5.1. and item 10.5.2. must include:
 - a) A template for the provision of information, on a quarterly basis, on the reporting of Transactions with Related Parties in a systematised manner for the period and cumulative period, through the provision of a presentation that incorporates the business with Related Parties in an aggregate manner, in each financial year;
 - b) The use, when available, of the information provided by the Integrity Due Diligence platform as to the nature of a certain entity as a Related Party and the establishment of mechanisms that ensure additional investigation in case the said platform does not have information

regarding a certain counterparty;

- c) Detailed information on the internal procedure of identification, collection and reporting of Transactions with Related Parties - flowchart including, specifically:
 - (i) Summary description of the operations and the responsibilities taken up by the parties;
 - (ii) Outline of the procedures used to select the counterparty, *i.e.* whether the operation was based on a call for tenders/market consultation procedure or direct contract award;
 - (iii) In the event of direct contract award, the reasons for this decision;
 - (iv) In cases of calls for tenders/market consultation procedures, the type of contact established with the potential interested parties and the identity of those parties;
 - (v) In case of competitive tenders, the details of the different tenders and the criteria used for selection;
 - (vi) The parameter used to check whether the transaction was performed under “normal market conditions for similar operations”;
 - (vii) Measures adopted to prevent, mitigate risks or solve potential conflicts of interests, namely the issuing of fairness opinions by independent entities prior to taking a decision regarding the performance of a Transaction with a Related Party;
 - (viii) Indication, if applicable, of the multi-annual nature of the operation, in which case the initial date of the award/contract must be reported, as well as the date on which the supplies and/or services are provided.
4. The EBD must report to the FMC/AUDC any situations of which it has knowledge, and which are liable to damage or have damaged EDP’s corporate interest, as soon as possible and regardless of the financial value in question, in accordance with a standard of diligence to be reasonably expected of a discerning and organised manager.
5. Upon analysis of the information reported by the EBD, the FMC/AUDC:
 - a) May request from the EBD additional information or documentation, deemed necessary to formulate a reasoned opinion on the situations analysed;
 - b) Must submit to the GSB its opinion on the analysis of the information reported, and may propose recommendations to be forwarded to the EBD;
 - c) If a situation is identified that may damage EDP’s corporate interests, it must immediately communicate this situation to the GSB, and may suggest measures to be adopted to resolve or manage the situation in a manner compatible with EDP's corporate interests;
 - d) Must issue a reasoned opinion on the matters subject to a prior opinion or their dismissal by the GSB, which concern transactions between related parties, supported, whenever applicable, by grounded opinions from the Risk and Compliance & Internal Control areas, which should be made known to the GSB.

11. PRIOR OPINION OF THE GSB ON TRANSACTIONS OF SIGNIFICANT IMPORTANCE

- 11.1 In requests for prior opinions on Transactions of Significant Importance, together with requests for prior opinions of the GSB or through the expedited mechanisms to obtain a prior opinion in cases of urgency, the EBD must provide, mutatis mutandis, the information provided for in 12.3.
- 11.2 In relation to Transactions of Significant Importance submitted for the GSB's prior opinion:
- a) If the FMC/AUDC is able to meet before the GSB meeting, the opinion of this committee should be requested, to be passed on to the GSB for the purposes of issuing the decision;
 - b) If the FMC/AUDC cannot hold the aforementioned meeting, the potential Conflict of Interests should be appraised directly by the GSB as part of its decision-making process.
- 11.3 For Transactions of Significant Relevance subject to the expedited mechanisms to obtain a GSB's prior opinion in cases of urgency, all the FMC/AUDC members should be consulted.
- 11.4 As part of the consideration of the EBD's request, the FMC/AUDC, the GSB or the Chair of the GSB may recommend to the EBD to take measures deemed appropriate to solve the potential Conflict of Interests.
- 11.5 Under the terms of the previous paragraph, whenever situations are reported by the FCM/AUDC regarding internal procedures relating to matters of Conflicts of Interest arising from EDP's activity, notably with its shareholders, as well as the effectiveness of the systems of assessment and resolution of these conflicts, the Corporate Governance and Sustainability Committee shall monitor and supervise the issue, namely by analysing any remedies proposed by the FMC/AUDC in terms of form or business structuring and the subsequent issuance of an opinion addressed to the FMC/AUDC.

12. DISCLOSURE OF TRANSACTIONS WITH RELATED PARTIES AND TRANSACTIONS OF SIGNIFICANT IMPORTANCE

- 12.1 Under the terms of the applicable regulations, EDP must disclose on the CMVM information disclosure system and on its website, no later than the time at which they are carried out, the Transactions with Related Parties that met any of the following requirements:
- a) whose value is equal to or exceeds 2.5% of respective consolidated asset;
 - b) that are not carried out under the scope of EDP's day-to-day business, or under market conditions.
- 12.2 The publication and reporting of the remaining transactions shall be ensured by EDP through the respective disclosure in the annual report.
- 12.3 The disclosure of Transactions shall include, at least, the following information:
- a) identification of the Related Party,
 - b) information on the nature of the relationship with the Related Parties,

- c) the date and value of the Transaction,
 - d) the rationale as to the fair and reasonable nature of the Transaction from the point of view of the Company and the shareholders who are not Related Parties, including minority shareholders, and
 - e) the meaning of the opinion of the supervisory body of the Company, whenever that opinion has been negative.
- 12.4 EDP will be exempted from complying with the disclosure obligations above referred in respect of the following Transactions:
- a) Carried out between EDP and its subsidiaries, provided that they are in a controlling relationship with EDP and no Related Party of EDP has interests in that subsidiary;
 - b) Relating to the remuneration of directors, or certain elements of such remuneration;
 - c) Proposed to all shareholders under the same terms in which the equal treatment of all shareholders and the protection of the Company's interests is assured.
- 12.5 Transactions with the same Related Party, entered into for any period of 12 months or during the same year, which have not been subject to the duties set forth in the preceding paragraphs, are aggregated as if they were a single Transaction for purposes of being subject to such duties.

13. RESPONSIBILITIES IN THE TRANSACTIONS WITH RELATED PARTIES MANAGEMENT SYSTEM

13.1. Legal & Governance is responsible for:

- a) Monitoring legislative or regulatory changes with an impact on these matters and on the EDP Group;
- b) Promoting the dissemination of this Policy;
- c) Promoting, together with Compliance & Internal Control, training activities about this Policy;
- d) Assessing, together with Compliance & Internal Control, the adequacy of this Policy and, if deemed necessary, submitting a review proposal to the EBD.

13.2. Compliance & Internal Control is responsible for:

- a) Creating and maintaining adequate control mechanisms for compliance with the established principles and rules;
- b) Monitoring compliance with and the development of this Policy;
- c) Promoting, together with Legal & Governance, training activities about this Policy;
- d) Assessing, together with Legal & Governance, the adequacy of this Policy and, if deemed necessary, submitting a review proposal to the EBD.

13.3. Consolidation, IFRS Reporting and Tax is responsible for communicating to Legal & Governance information regarding the companies that consolidate using the full consolidation method and those consolidated using the equity method (associates and joint ventures) as well as the balances and respective transactions, pursuant to paragraphs (i) to (iii) of item b) of the definition of "Related Parties";

13.4. The EBD is responsible for:

- a) Approving this Policy, on proposal by Legal & Governance;
- b) Submitting this Policy to the binding prior opinion of FMC/AUDC and the GSB approval;
- c) Reporting and submitting to the GSB, notably to the FMC/AUDC, for appraisal of the relevant transactions under this Policy.

13.5. The GSB is responsible for:

- a) Monitoring and assessing issues relating to systems for the assessment and resolution of conflicts of interests, including those concerning the Company's relations with shareholders and issuing opinions on these matters;
- b) As part of its assessment of EDP's annual and interim management reports, and taking into account the work carried out by the FMC/AUDC, issuing an opinion on the application of this Policy in relation to transactions performed between Related Parties;
- c) Recommending to the EBD appropriate measures for reinforcing the mechanisms for identifying, preventing and resolving Conflicts of Interests;
- d) In the event of relevant situations that are damaging to EDP's interests, assessing the consequences of these situations and taking any measures required to protect this interest;
- e) Approving this Policy;
- f) Ensure that, in the assessment of situations submitted to it, GSB members who are in a situation of Conflict of Interest do not participate in this assessment.

13.6. Without prejudice to its decision-making powers and to the possibility that it may at any time call upon those functions, the GSB delegates to the FMC / AUDC the continuous monitoring of the evaluation and inspection of the principles and rules of this Policy, as well as the effectiveness of the Transactions with Related Parties management system.

13.7. The FMC/ AUDC is responsible for:

- a) Within the scope of the competences delegated by the GSB, monitoring and assessing issues related to systems of assessment and resolution of Conflicts of Interests, including with regard to the Company's relations with shareholders and issuing opinions on these matters;
- b) Intervening in the mediation of Conflicts of Interests raised within the scope of the Company's undertakings, namely with regard to shareholders;
- c) Issuing an opinion on the matters submitted to the GSB for prior opinion or through the expedited mechanisms to obtain a prior opinion in cases of urgency, concerning business between Related Parties, corporate governance, sustainability or that gives rise to Conflicts of Interests

between the Company, shareholders and members of its corporate bodies, of which the GSB should be informed for the purposes of the respective decision;

- d) Monitoring with special attention the Company's institutional and commercial relations with the members of the corporate bodies and qualifying shareholders, identifying any Conflicts of Interest;
- e) Issuing binding prior opinion on this Policy;
- f) Informing the GSB of its activity on a regular basis;
- g) Submitting recommendations to the GSB, as well as adopting adequate measures to identify, prevent and resolve Conflict of Interests in the situations submitted to it;
- h) Reporting the results of its activity on this matter in the GSB's annual report, including a conclusive opinion on the EBD's performance in terms of meeting the guidelines defined for handling Conflicts of Interests.

14. COMMUNICATION OF THE POLICY AND TRAINING COURSES

This Policy is disseminated to all Employees of EDP Group, as well as to the members of EDP Group's corporate bodies and, whenever relevant, to the Third Parties.

All new Employees must have access to this Policy and the procedures related to it as soon as possible after taking up their post at EDP Group.

Legal & Governance and the Compliance & Internal Control will promote training initiatives related to this Policy. These initiatives must be appropriate to the degree of exposure of the respective addressees to the risks addressed in this Policy.

15. COMPLAINTS AND/OR COMMUNICATION OF IRREGULARITIES (WHISTLEBLOWING)

The EDP Group provides necessary means and channels for the communication of irregularities or complaints, which are managed by independent and impartial areas.

Becoming aware of the occurrence of situations of non-compliance with the policies and procedures, as well as situations that represent, or may be perceived as attempts at corruption, bribery or other illicit acts, must be reported through the channels provided for the purpose.

EDP ensures the protection and non-discrimination of Employees or Third Parties who report inappropriate practices or non-compliance with the policies and procedures in force. No acts of reprimand or retaliation will be tolerated against those who make such communications or complaints in good faith.

16. MONITORING AND CONTINUOUS IMPROVEMENT

In order to promote adequate mechanisms and procedures for monitoring compliance with this Policy, as well as to guarantee the follow-up of its development, Legal & Governance is responsible for monitoring relevant legislative changes with an impact on these matters in the EDP Group, promoting any updates that may be considered necessary. Compliance & Internal Control is responsible (i) for monitoring the adequacy of the methodologies for identifying and assessing risks, the defined policies, procedures and control mechanisms and (ii) for monitoring the effective implementation / operationalisation of the defined control procedures and mechanisms.

When Legal & Governance and Compliance & Internal Control become aware of situations of non-compliance or misalignment with this Policy, they must:

- a) Analyse the situation that has occurred, namely by trying to determine the respective causes and consequences;
- b) Verify the possibility of immediate mitigating actions.

Compliance & Internal Control must also:

- a) Ascertain the possibility of similar situations occurring in other circumstances;
- b) Identify the corrective actions necessary so that the situation does not recur in that same or any other circumstance;
- c) Promote the implementation of corrective actions, proposing the adjustment of existing procedures and controls, if necessary;
- d) Ensure the follow-up of the implementation of the corrective actions identified.
- e) Ensure the reporting to the EBD and to the GSB, notably to the FMC/AUDC, of the monitoring and continuous improvement activities carried out.

17. NON-COMPLIANCE

Non-compliance with this Policy will be sanctioned internally. The appropriate disciplinary and/or legal measures will be taken.

Non-compliance with the procedures and rules set forth may constitute a serious or very serious administrative offence, depending on the legal provision which has been infringed. Such an offence is punishable by a fine and ancillary sanctions, which include the temporary prohibition of the exercise by the offender of the profession or activity to which the administrative offence relates, the inhibition of the exercise of administrative, management, managerial, leadership or supervisory functions and publication by the CMVM of the sanction applied for the administrative offence committed.

The potential administrative offence liability of EDP Group entities does not exclude the individual liability of natural persons holding administrative, managerial, leadership or supervisory positions, representatives, employees or other permanent or temporary staff.

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

18. FINAL PROVISIONS

Legal & Governance is responsible for reviewing this Policy, in conjunction with Compliance & Internal Control and the GSB Support Office, every two years or whenever there are relevant changes in the applicable legal framework and in the context of the activities carried out by the EDP Group and also whenever new elements arise that demonstrate that it is not entirely adequate. It must submit the proposed changes for the approval of the EBD and the GSB and the FMC / AUDC of EDP.

Any doubts over interpretation or regarding the application of this Policy should be addressed to Legal & Governance, which will provide advice on the most appropriate course of action.