



EDP Group Interests Representation Policy

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1. VERSION HISTORY

Version	Approval date	Prepared by	Approval	Note
1	04/07/2023	EA&S Corporate Global Unit	EBD	Initial issue

2. PURPOSE

2.1. SUBSTANTIATION

EDP – Energias de Portugal, S.A. (EDP or Company) vision is to be a global energy company, leader in the energy transition towards superior value creation.

In this framework, its corporate strategy is aligned with the ambition of the Paris Agreement to limit the increase of the global average temperature to 1,5°C.

In order to achieve this goal, a collective effort is required, and EDP is committed to bring together key Stakeholders, making those relationships one of its strategic priorities. This position has been stressed in all the forums and associations in which EDP participates, as well as with all regulatory bodies EDP interacts with.

EDP's Stakeholders are part of the Company's sustainability strategy, and since 2004, the EDP Group has adopted the Principles for Sustainable development, which aim to:

- Ensure an open and trusting relationship with all Stakeholders;
- Promote consultation and communication channels with Stakeholders and take their contributions and expectations into account;
- Report economic, environmental and social performance in a transparent and objective way.

EDP reports, since 2017, the activities carried out under the Principle of Transparency in Institutional Relations, which entails the prohibition of any contribution or association of EDP to political parties, candidates, political campaigns/candidacies or to related people or entities, including through the direct or indirect delivery of goods or provision of services on behalf of or representing EDP and the prohibition to use EDP resources for actions related to those, demonstrating having a transparent approach with the organizations. EDP makes known, before the competent entities, the legitimate interests of the Company and/or the sector, which it believes should be considered within the scope of the aforementioned processes of forming decisions.

This Policy comes as a response to the increased scrutiny to which companies are now subject, and is essential, to strengthen EDP's position in the management of its Stakeholders, publicising the respective transparency and ensuring the disclosure of information on the activities aimed at presenting this same position (hereinafter "Interests Representation").

2.2. OBJECTIVE

The Interests Representation Policy aims to define and regulate the approach of to EDP's relationship with national and international organizations that engage in activities within its scope of intervention (as defined in item 6.1.1.).

EDP works pro-actively and constructively with governments, sector associations, suppliers, clients, communities, and other Stakeholders, assuming the commitment to involve them through active listening, sustainable action plans and absolute respect for the legislation and regulations in force.

All external representations in institutions that promote the sharing of knowledge or networking, if in accordance with the EDP Group's ethical values, are eligible Interests Representations.

This Policy also aims to define the general principles of action and the duties applicable to EDP and its controlled companies, to promote Transparency and Integrity in all the markets where EDP operates.

When representing EDP's positions in different Interest Groups, all employees will strictly follow EDP's commitment to Integrity, Transparency and responsible political involvement.

It is also intended to contribute to fostering Ethics in the performance of any activity by EDP, ensuring compliance with the law, regulation, principles and rules adopted.

3. SCOPE

This Policy applies to EDP, as well as to all companies owned by EDP based in Portugal, and also to Fundação EDP. For controlled companies, whether based in Portugal or abroad, the members of the management bodies appointed by EDP in these companies shall promote the transposition of this Policy. The same principle should apply to Fundación EDP and Instituto EDP.

This Policy seeks to establish a programmatic framework and a common commitment to the Interests Representation in EDP and its controlled companies, notwithstanding the local specificities in force in the various geographies where the EDP Group operates. In this sense, the controlled companies 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. 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 External Affairs & Stakeholders Corporate Global Unit (EA&S), who may undertake the respective analyses along with the Compliance & Internal Control Corporate Global Unit (C&IC) and Legal & Governance Corporate Global Unit (L&G).

Adequate cross-cutting coordination should be maintained to ensure ongoing consistency between policies or procedures and the principles established in this Policy.

4. INTERNAL AND EXTERNAL REFERENCES

4.1. INTERNAL REFERENCES

- a) Code of Ethics;
- b) Integrity Policy;
- c) EDP Group Stakeholder Relationship Policy and Stakeholder Segmentation Model;
- d) EDP Group Stakeholder Management Methodology Guide (include Local Stakeholders Engagement Plan);
- e) EDP Group Environmental Policy;
- f) Procedure for Relations with Politically Exposed Persons;
- g) Principles of Sustainable Development;
- h) Supplier Code of Conduct;

- i) Binding Instructions;
- j) Policies and Procedures;
- k) Social Investment Policy;
- l) “*Stakeholders Management – Reputation Survey Action Plan*”.

4.2. EXTERNAL REFERENCES

- a) OECD (2011), OECD Guidelines for Multinational Enterprises;
- b) Accountability (2015), AA1000 Stakeholder Engagement Standard;
- c) Corporate Sustainability Report Directive (CSRD);
- d) European Sustainability reporting Standards through EFRAG, European Financial; Reporting Advisory Group;
- e) Proposal for an EU Directive on corporate sustainability due diligence (entry into force 2024);
- f) OECD Principles for Transparency and integrity in Lobbying;
- g) UN Global Compact Report on Responsible Lobbying;
- h) International Standards for Lobbying Regulation;
- i) Treaty on European Union;
- j) European Transparency Initiative;
- k) Interinstitutional Agreement on the transparency register;
- l) The EU Transparency Register Code of Conduct.

5. TERMS AND DEFINITIONS

CGU: Corporate Global Units play a structural role in supporting the Executive Board of Directors in defining and controlling the execution of strategies, policies and objectives.

European Union Institutions: European Parliament, Council of the European Union and European Commission.

Expenditure: Monetary amount to support Interests Representation activities, which may take one of the following forms:

- a) Undertakings;
- b) Sponsorships;
- c) Supporting specific work groups;
- d) Outsourcing of companies, namely specialized consulting firms.

In-house Lobbyist: EDP Group employee who develops lobbying activities in the United States of America or with the European Union Institutions.

Interests Groups: The representatives that promote the defence of the Company's interests in a transparent and responsible way.

Interests Representation: Activity that reflects the approach to the relationship of EDP and its controlled companies, with national and international organizations that engage in action falling within its scope set out in point 6.1.1, an activity that is guided by Integrity and Transparency.

Lobbyist: Any person, company or organization that carries out lobbying activities in the United States of America or within the European Union Institutions, on behalf of a third-party client or whose employees conduct lobbying activities on behalf of a third-party client, in accordance with the applicable law or regulation in those jurisdictions, and duly registered in a public domain register under US and/or European Union law.

6. DESCRIPTION AND RESPONSIBILITIES

6.1. DEFINITION AND COMMITMENTS

6.1.1. Interests Representation

Covering important issues that affect EDP's activities and/or Stakeholders, Interests Representation comprises activities that are carried out with the aim of participating in the processes of forming public decisions, developing interactions with various institutions at national and international level, with a view to making known to the competent entities the legitimate interests of the Company and/or the sector, which EDP believes should be considered within the scope of the aforementioned processes of forming decisions. Interests Representation includes the following activities:

a) Lobbying activity

Lobbying is a legal and regulated activity in some markets in which EDP is present, notably in the United States of America and with the European Union Institutions. As such, and considering only and exclusively these markets, this Policy considers as lobbying the activity developed by the In-house Lobbyists and Lobbyists, as defined above.

b) Business and trade associations or tax-exempt groups representing collective interests

This subgroup comprises business and trade associations or tax-exempt groups for the public construction of the processes of forming decisions (in particular, legislative and similar processes with an impact on the business) or sharing of knowledge (in thematic working groups), where EDP, or any of the companies to which the Policy applies, is a member.

c) Others representing collective interests

This category comprises other Interest Groups not included in points a) and b) above that contribute in encouraging companies to develop activities envisaged in the scope of this Policy in the Stakeholder engagement process.

d) Exclusions:

The definition of Interests Representation doesn't cover:

- 1) Financing of local, regional or national political campaigns / candidates, as none of the Group companies makes monetary contributions or contributions in kind to political parties, candidates, campaigns, political candidacy structures or related persons or entities. Notwithstanding this exclusion, the specific situation of EDP Renewables North America (EDPR NA) must be considered as, under the applicable laws and regulations, this subsidiary adopts mechanisms for the participation of its employees in political processes, having established a policy action committee (PAC) called "EDPR NA PAC". The EDPR NA PAC is fully funded by voluntary personal monetary contributions made by members of the PAC, which, in accordance with the applicable laws and regulations, is constituted by employees. Within this framework, decisions on political campaigns to be supported are approved by the PAC's Board of Directors, whose members are elected under the terms of applicable legislation and regulations. EDP Group companies do not make any financial contributions to these funds and have no influence on how these funds are allocated.
- 2) EDP Social Investment Policy.

6.1.2.EDP Commitments

EDP undertakes to:

- Pursue its activity in strict compliance with the laws and regulations in force, together with the promotion of responsible action guided by the strictest standards of Transparency, Ethics and Integrity. EDP guarantees compliance with national and international legislation applicable to each entity in the EDP Group, as well as with this Policy and other internal regulations in force, and any acts and/or omissions that constitute a breach or infringement of such rules are not tolerated. Therefore, EDP promotes a conduct that complies with the legislation in force, that is honest, upright, professional and fair conduct, and requires that the companies that constitute the Group, their employees and third parties acting on their behalf guide their behaviour in accordance with this commitment.
- Externally disclose, in its Integrated Annual Report, the most significant Interests Representation activities and the total value of the related Expenditures, as well as all relevant position reports. Detailed information on Interests Representation activities and climate positioning representation is available on the [corporate website](#) under "Transparency in Institutional Relations".
- Comply with the following stages for the purposes of joining a certain entity within the scope of Interests Representation activity:
 - 1) Before EDP or any company to whom this Policy is applicable formally joins an association, an in-depth analysis of the public positions, the mission, the organization and its alignment with EDP Group's strategic objectives must be carried out, including the positioning regarding the Paris Agreement goals. New memberships must be

approved by the respective Board of Directors and such information shall be provided to the Executive Board of Directors.

In respect of any Expenditure to be incurred, the provisions set out in EDP's internal regulations shall be observed.

- 2) Once the membership has been formalised, monitor the organization's activity with a view to disclosing EDP Group's position and verifying the respective alignment.
- 3) Carrying out an annual meeting in order to verify the alignment with EDP's strategy and, if this is the case, renew membership, to be approved by the respective Board of Directors, and such information shall be provided to the Executive Board of Directors.

When a misalignment with EDP's strategy occurs, the following actions should be taken:

- Contribute actively, through working groups, promoting the EDP Group's position and/ or taking positions of responsibility within it, to promote common ground that enables alignment with the Group's strategy, namely regarding climate transition, influencing the policies and perspectives of that organization.
- Expressly state non-support of the activity carried out.
- Ultimately, consider not reviewing membership and/or to formalize the forfeiture of membership, publicly disclosing it.

6.1.3.EDP's Employees obligations

Each employee who is legally authorized to undertake Interests Representation activities and act on behalf of EDP or of the companies to which this Policy is applicable shall:

- Act within the limitations imposed by EDP's internal regulations in force.
- Internally disclose the information set out in the Annex (Interests Representation internal report), through the means indicated in item 6.2.2 below.
- If mandatory under the legal framework in force with the European Union Institutions and/or the United States of America, register prior to engaging in any lobbying activity.

6.1.4.Lobbyist's obligations

The Lobbyist shall be duly registered and communicate to EDP of any change in its registration. Whenever acting on behalf of EDP or of a company to which this Policy applies, the Lobbyist shall inform the company concerned and guide its conduct in accordance with the principles set out in this Policy, as well as the other internal regulations in force, and always in compliance with the applicable legal framework. A Lobbyist may only conduct this activity if and when it is regulated by the jurisdiction in which it operates, namely with European Union Institutions and in the United States of America.

6.2. RESPONSIBILITIES

6.2.1. Implementation

The development of Interests Representation activities should consider:

- a) The regulatory framework to which EDP Group companies should abide in the various markets where they operate, as well as, the EDP's Code of Ethics and EDP Group's Integrity Policy and other internal regulations in force;
- b) The goals and commitments of EDP's business;
- c) The disclosure, in a transparent manner, of the procedures, management systems and compliance mechanisms of Interests Representation activities, namely in the Integrated Annual Report;
- d) The mapping of the Interest Groups involved and their management;
- e) Training for EDP's employees or companies to whom this Policy is applicable, or third parties acting on behalf of EDP on EDP Group companies, to ensure compliance with the provisions of item 6.1.3 above.

6.2.2. Action Principles

EDP's Executive Board of Directors is responsible for approving the definition of objectives, policies and management models regarding Stakeholder management, including the Interests Representation of the EDP Group, in line with the strategic objectives.

The process of managing Interests Representation activities is conducted by the EA&S.

Companies to which this Policy applies, that have local teams that monitor Interests Representation activities, shall report their activities to EA&S, as follows:

- Each Business Unit (BU) and CGU must have a designated contact person. This person should be the responsible for keeping an updated table as per the Annex (Interests Representation internal report) and disclose it biannually or whenever deemed appropriated to EA&S;
- In EDP's Interests Representation activities with more than one element, a contact person designated by the BU or CGU involved shall be identified in advance;
- The person responsible for the BU/CGU shall communicate annually, or whenever relevant, to EA&S, among the organizations that it follows within the scope of Interests Representation Activities, those that it considers appropriate to withdraw from. The same process shall be observed in the identification of new organizations in which EDP should be present and the activity developed with them.

EA&S should submit an annual report to the Executive Board of Directors on the monitoring of Interests Representation, suggesting new representations and identifying development opportunities. This report should also include an analysis of the annual Expenditures and their impact.

6.2.3. Consultation and complaint mechanism

Without prejudice to the other channels existing at EDP, if an employee of the EDP Group companies, a third party acting on behalf of EDP or any of the companies to which this Policy applies, encounter any doubts about how to act in a particular situation, should get in touch with EA&S at stakeholders@edp.com.

7. FINAL PROVISIONS

- a) This Policy revokes the Principle of Transparency in Institutional Relations approved in 2017.
- b) The EDP Group companies are responsible, within the scope of their action, to implement the necessary procedures and actions for the correct implementation of the Policy.
- c) Each of the companies to which this Policy is applicable is responsible for communicating to Stakeholders the Interests Representation Policy.
- d) The Policy is effective from the date of its approval by the EDP's Executive Board of Directors.
- e) EA&S is responsible for the review and adequacy of this Policy, and proposals for revision should be submitted whenever deemed appropriate.
- f) This Policy will be published on EDP's corporate website.
- g) A communication plan will be promoted to inform all employees of EDP Group companies or third parties acting on behalf of EDP or of the companies to whom this Policy is applicable, about the content of this Policy.

Annex – Interests Representation internal report

Market	Name	Type of IR (Lobbying, Associations and Tax- Exempt Groups, Others)	Level of engagement of EDP's representative	Expenditure	Type of Expenditure	Type of activities carried out	Public position/result of the interaction held, if existent