

Respect for Human Rights Monitoring Program in EDP Group

Impact Monitoring Guide

Guiding principles for companies and UN human rights - Ruggie Framework

| Nr. | Human rights Impact Monitoring Guide List, business applicability for the EDP Group, areas of possible impact and application notes | Applicable to EDP | Included themes | Seen on UN Practices and plans (*) |
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| * Attach or describe | | | | |
| 1. | Right to life Impacts: Employees (occupational health and safety) Supply Chain (workers provided by subcontractors and suppliers) Communities (electricity and gas exploration activities, as well as construction) Customers (supply of electricity and gas) | Yes | - occupational safety: the company must provide appropriate levels of security and occupational health, at the risk of loss of life of employees or third parties | |
| 2. | Right to liberty and security Impacts: Employees (occupational health and safety) Supply Chain (workers provided by subcontractors and suppliers) | Yes | - liberty: the Company must provide an environment without constraints and without undue impediments. - security at work, activities and installations: the Company must comply with the good practices and provide adequate levels of occupational health and safety, or risk harm to employees or third parties | |
| 3. | Right not to be subjected to slavery, servitude or forced labor Impacts: Employees Supply Chain (workers provided by subcontractors and suppliers) Business partners Opportunities: Participation in collaborative initiatives to raise awareness to the problem of child labor or forced labor and human trafficking | Yes | - dignity of the human person, urbanity - equal opportunities and non-discrimination | |

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| 4. | <p>Right not to be subjected to torture, cruel, inhuman or degrading treatment</p> <p>Impacts: Employees (impediments and psychological harassment) Supply Chain (workers provided by subcontractors and suppliers) Communities (when faced with constructive interventions or the operating conditions of industrial facilities)</p> | Yes | <p>- occupational safety and work environment free of unlawful bias and constraints</p> | |
| 5. | Right to be recognized as a person before the law | N/A | | |
| 6. | <p>Right to equality before the law, equal protection and non-discrimination</p> <p>Impacts: Employees (diversity) Supply Chain Communities Customers</p> <p>Positive discrimination may be justified, the Company's proactive and virtuous attitude to reverse imbalances, avoid the perpetuation of prejudices and unjustified discrimination, seeking to establish favorable conditions for equal opportunities</p> | Yes | <p>- equal opportunities and non-discrimination</p> <p>- recruitment; salary;</p> <p>- undocumented workers or workers in an irregular and illegal situation</p> <p>- engagement with communities, especially indigenous populations</p> <p>- customers, contractual aspects, regulation (exemption) and competition</p> <p>- complaint procedures, participation and follow-up of decisions and their processes</p> | |
| 7. | Right not to be subjected to war propaganda or incitement to racial, religious or nationalist hatred | N/A | | |
| 8. | <p>Right of access to effective remediation</p> <p>Impacts: Employees Communities Customers</p> | Yes | <p>- complaint procedures and follow-up of decisions and their processes</p> <p>- occupational safety</p> | |

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| | The Company shall ensure channels and complaint procedures, in order to provide effective access to full remediation for any damage or negative impacts of interventions arising from the activities and operation of power plants, etc. | | - Communication, consultation, information to affected populations | |
| 9. | <p>Right to a fair trial</p> <p>It is a State obligation, particularly of the authorities and the justice system; still, there may be negative impacts (related to bad practices such as corruption and bribery) and positive - for example, means of legal advice to poor or vulnerable workers.</p> <p>One possible interpretation of this law may create the framework and practice of internal decisions in disciplinary proceedings, inquiries, investigations, claims and investments for those who participate and those who are accused</p> | Yes | <p>- complaint procedures and follow-up of decisions and their processes</p> <p>- engagement with communities, especially indigenous populations, where access to information, informed consent, effective repair and economic progress conditions, social development and integrity of the cultural identity, are concerned</p> | |
| 10. | Right not to be subjected to retroactive criminal laws | N/A | | |
| 11. | <p>Right to privacy</p> <p>Impacts: Employees Suppliers Customers</p> <p>Privacy is susceptible to interference especially in the case of personal data handling, for which it is important to ensure the protection of the data's integrity and confidentiality</p> | Yes | <p>- Conditions of work and workplace design</p> <p>- information systems, databases and data processing, personal data protection, commercial secrecy and condition of confidentiality</p> | |
| 12. | <p>Right to freedom of movement</p> <p>It is the responsibility of the State to ensure freedom of movement in the territory of a country or between different countries, but the Company can positively contribute with programs that enable internal mobility.</p> <p>Concerning the supply chain, it may impact undocumented workers - Passport</p> | Yes | <p>- Work conditions and workplace design</p> <p>- communities, particularly indigenous populations, relatively large impact enterprises</p> | |

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| | <p>Also, large enterprises or facilities may affect the freedom of movement of the population</p> <p>Impacts:</p> <p>Employees</p> <p>Suppliers and service providers</p> <p>Communities</p> | | | |
| 13. | Right to seek asylum from persecution in another country | N/A | | |
| 14. | Right to a nationality | N/A | | |
| 15. | <p>Right to protection for children</p> <p>Impacts:</p> <p>Employees</p> <p>Supply Chain</p> <p>Community</p> <p>EDP Group expressly prohibits the use of child labor throughout the supply chain.</p> <p>Concerning employment, the positive impacts arise from the reconciliation of work and family, as well as supporting the education of the employees' children and other social nature programs meant to protect children.</p> <p>Positive impact stems from initiatives related to development support (patronage and others) aimed at the economic and social development of the regions where it carries its activities and sets up production facilities, as well as incentives for education, culture, etc.</p> | Yes | <p>- work conditions, design of workstations and working hours, balance between work and family</p> <p>- supply chain: verify the compliance with fair wage and the prohibition of the use of child labor</p> <p>- well-being of the communities affected by the projects</p> | |
| 16. | <p>Right to marry and start a family</p> <p>Impacts:</p> <p>Employees</p> <p>Supply Chain</p> <p>Community</p> <p>Good work practices include the balance between work and personal and family needs in order to provide healthy and appropriate lifestyles</p> <p>Positive impacts may result from the flexibility programs and special support programs during and after pregnancy</p> | Yes | <p>- work conditions, design of workplaces and working hours, balance between work and family</p> <p>- diversity, respect for gender equality, maternity support and non-discrimination - women, age, pregnancy</p> | |
| 17. | Right to property | Yes | - Acquisition or expropriation of | |

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| | <p>Impacts: Employees Supply Chain Community</p> <p>This right is primarily associated with resettlement issues, displacement of communities or "expropriatory" interventions related to the realization of projects, construction, establishment of electric lines and gas pipelines as well as the respective support facilities - poles, transformer and sectioning stations, pressure stations, etc. - so it is important to listen to the affected populations and provide information, including contact and complaint channels</p> <p>The right to property can also be analyzed from the perspective of copyright (patents, etc.) of workers' inventions</p> | | <p>property affects the realization of projects and ventures</p> <ul style="list-style-type: none"> - programs to support local development - engagement with communities, especially indigenous populations, in regards to access to information, informed consent, effective repair and economic progress conditions, social development and integrity of cultural identity - evaluation of social impact - complaint procedures and follow-up for decisions and their processes | |
| 18. | <p>Freedom of thought, conscience and religion</p> <p>Impacts: Employees</p> <p>EDP may also have impact on these matters for the value chain (customers, partners, suppliers and service providers, etc.) or the community in general, given the universality of its activities and obligations</p> <p>Essentially, it should ensure that there are no impediments in regards to religious practices, harmonizing the individual beliefs of employees with business needs and other collaborators</p> | Yes | <ul style="list-style-type: none"> - Work conditions, schedules, teams, personnel management - diversity | |
| 19. | <p>Freedom of opinion, information and expression</p> <p>Impacts:</p> | Yes | <ul style="list-style-type: none"> - means of consultation, report, complaint, | |

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| | Employees | | information and transparency | |
| 20. | <p>Freedom of assembly/manifestation</p> <p>Concerning "political or civic manifestation," this freedom is exercised before public authorities.</p> <p>Where "assembly" is concerned it may apply to employees</p> | Yes | - work conditions; community relations | |
| 21. | <p>Freedom of association</p> <p>Impacts: Employees</p> <p>In essence, EDP should ensure a correct relation with the unions, work councils and other bodies representing employees</p> | Yes | - work conditions - relation with organizations representing workers | |
| 22. | <p>Right to civic participation</p> <p>In regards to the "exercise of citizenship", this freedom is exercised before public authorities.</p> <p>However, the Company and respective associates are inexorably embedded in a social context that can justify information, awareness and even intervention actions in regards to conformation, the balances in the face of community needs and the relationship between the Company, its employees and the outside reality, in addition to emergency and crisis situations.</p> <p>Impacts: Employees</p> <p>In essence, EDP should ensure a correct relation with the community and there may be positive impacts related to the harmonization of working hours, reconciliation programs, volunteering and providing the means to support civic activities</p> | Yes | - work conditions; community relations | |
| 23. | <p>Right to social security, including income and health</p> <p>Impacts: Employees Supply Chain (illegal or irregular workers)</p> <p>Positive impacts arise from additional social protection and health systems, as well as attention to individual or group situations, in addition to strict compliance with the declarative and contributory legal duties</p> | Yes | - work conditions - personnel management procedures and coordination with the fulfillment of legal obligations, declarative obligations, tax returns, fiscal and | |

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| | | | <p>para-fiscal obligations</p> <p>- retirement, early retirement and anticipation of early retirement; staff reduction and departure programs</p> | |
| 24. | <p>Right to work</p> <p>Impacts: Employees Supply Chain</p> <p>In essence, staff reduction plans should be devised and implemented without prejudice or psychological harassment or unjustifiable discrimination</p> <p>Positive impacts will arise from recruitment campaigns, professional internship and giving support to employment or entrepreneurship especially among disadvantaged communities or in regions where the EDP Group has activities with economic and social impacts</p> | Yes | <p>- work conditions; personnel management procedures; duration of the employment contract (job insecurity); and non-discrimination</p> <p>- relation with the organizations representing workers</p> <p>- staff reduction plan, pensions, early retirement and anticipation of early retirement;</p> <p>- complaint procedures and follow-up for decisions and their processes</p> <p>- undocumented workers or workers in an irregular, illegal or precarious situation</p> | |
| 25. | <p>Right to decent working conditions</p> <p>Impacts: Employees Supply Chain</p> <p>In the EDP Group, the references and practical applications of decent working conditions and fair wages (equal pay for</p> | Yes | <p>- work conditions; personnel management procedures; duration of the employment contract (job insecurity); and non-discrimination</p> | |

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| | <p>equal work, under the rules and instruments of collective regulation, with results above those legally required and above the average of the countries in which it operates, can constitute a positive impact – which must be preserved, and verified as much as possible, so as to encourage it across the supply chain.</p> | | <ul style="list-style-type: none"> - relation with the organizations representing workers - complaint procedures and follow-up for decisions and their processes - occupational health and safety | |
| 26. | <p>Right to form and join trade unions and right to strike</p> <p>Impacts: Employees</p> <p>In essence, EDP should ensure a correct relation with the unions, works councils and other bodies representing employees</p> | Yes | <ul style="list-style-type: none"> - relation with organizations representing workers | |
| 27. | <p>Right to an adequate standard of living</p> <p>Impacts: Employees Community</p> <p>Access to proper nutrition both in quality and quantity, water (for personal and domestic uses) and sanitation, clothing, housing and habitable environments and the improvement of living conditions are points in which the presence of the corporates is capable of bringing real positive or negative impacts</p> | Yes | <ul style="list-style-type: none"> - work conditions, safety and health - evaluation, mitigation and repair effects to the environment and on communities - Indigenous populations - engagement, information and consultation and free consent of the concerned parties | |
| 28. | <p>Right to health</p> <p>Impacts: Employees Supply Chain Customers Community</p> | Yes | <ul style="list-style-type: none"> - work conditions, safety and health - psychological harassment (psychological impediments) | |

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| | <p>The conditions in which the work is carried out and the safety of the installations and activities of the EDP Group (electricity - including electromagnetic fields - and gas or construction works are especially susceptible to cause hazards or impact the health (physical or mental) of employees and service providers as well as that of clients and the population in the neighborhood</p> | | <ul style="list-style-type: none"> - evaluation, mitigation and repair purposes to the environment and communities - Indigenous populations - precautionary principle - prevention and emergency means | |
| 29. | <p>Right to education</p> <p>The insurance of the education of citizens obviously lies with the State but EDP Group also has obligations to its employees, as part of its human resource policies and management practices, vocational training - extensively to the supply chain - and valuing people.</p> <p>Positive impacts: programs that enable the employees to learn throughout life and for their personal development in various areas, including civic education, support for the education of employees and their families, as well as sponsorship and volunteering in the areas of education and teaching.</p> <p>In particular, in areas of intervention, operations and construction projects, the equipping of the communities in terms of valences that allow them to access education and teaching</p> | Yes | <ul style="list-style-type: none"> - work conditions, safety and health - management of human resources, skills assessment, identification of needs and training opportunities - Training, qualifications, skills - equal opportunities, respect for diversity - supply chain | |
| 30. | <p>Right to participate in cultural life, to benefit from scientific progress and moral and material rights of invention and authorship</p> <p>Relates to the access and promotion of information on scientific and technological development.</p> <p>Another aspect is the respect for patents and copyrights on industrial and technical areas and also on artistic and cultural areas.</p> <p>Positive impacts: contributions to scientific, academic, cultural communities and participation in programs and</p> | Yes | <ul style="list-style-type: none"> - engagement with communities, especially indigenous populations, access to information, informed consent and effective repair - Conditions of economic progress, social development and cultural identity integrity | |

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| | collaborative projects of educational nature, research and innovation, new technologies, health, etc. | | - information-protection, ownership and authorship | |
| 31. | <p>Right of self-determination</p> <p>Impacts: Community</p> <p>Self-determination can be affected by the realization of large enterprises that involve relocation or displacement of communities and by their economic and social development, access to resources, the environment and cultural identity</p> <p>positive impact will result from early involvement with the population and the design, project planning and implementation of adequate subsistence and development conditions</p> | Yes | <p>- ecosystem services</p> <p>- engagement with communities, especially indigenous populations, access to information, informed consent</p> <p>- Conditions of economic progress, social development and integrity of the cultural identity</p> <p>- complaint procedures and effective remedy channels</p> <p>- evaluation of social impact</p> | |
| 32. | Detainees' right to human treatment | N/A | | |
| 33. | <p>Right not to be subject to imprisonment for contractual compliance failure</p> <p>But... it can relate to, although very indirectly, with the issue of trade and supply disruption in situations of extreme vulnerability</p> | N/A | [The situation of vulnerable customers should receive special attention] | |
| 34. | Right of foreigners to due process in cases of expulsion | N/A | | |
| 35. | <p>Minority rights</p> <p>Impacts: Employees Value Chain (Customers / Partners / Especially the supply chain: Suppliers and service providers) Community</p> <p>Duty to avoid unjustified discrimination based on ethnic, religious or language that certain population minorities have the right to preserve and practice, especially in the presence of indigenous populations which are especially vulnerable</p> | Yes | <p>- work conditions</p> <p>- equal opportunities and non-discrimination</p> <p>- evaluation of social impact</p> <p>- complaint procedures and effective remedy channels</p> | |

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| | Positive impacts: promoting diversity and inclusion; awareness of the need to respect minorities, as well as of providing conditions for the religious practices of employees | | <ul style="list-style-type: none">- Conditions of economic progress, social development and integrity of the cultural identity- engagement with communities, especially indigenous populations, access to information, informed consent | |
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