

The background of the slide is a photograph of a solar farm. Two large, rectangular solar panel arrays are visible, tilted towards the sun. The panels have a grid-like pattern of smaller solar cells. The ground is dry and covered with low-lying vegetation. The sky is clear and blue. A green line and a blue line are drawn across the image, starting from the left and ending near the solar panels. The EDP logo is in the top right corner.

Additional Sustainability Indicators for the EDP Group 2024

This report

In 2024, EDP Group (“EDP”) prepared the “Sustainability Statement” for the first time, a new section in its Integrated Annual Report, in application of the Corporate Sustainability Reporting Directive (CSRD) issued in 2022, and in accordance with the European Sustainability Reporting Standards (ESRS), issued by the European Financial Reporting Advisory Group (EFRAG).

The Group’s Sustainability Statement for the year ended December 31, 2024, is available at [LINK](#), in the new section specifically dedicated to sustainability reporting. This section complies with the requirements of the CSRD and the ESRS, included most of the environmental, social, and governance disclosures required by the ESRS. The report also includes information about other indicators in the annex (Annex 3: Other Indicators), which are indicators that EDP did not have to report under the requirements of the CSRD– ESRS.

Given the importance to stakeholders and ESG ratings, a few data points from our ESG performance (both qualitative and quantitative), which were not included in that section of EDP Annual Integrated Report or in the Annex 3, have been prepared and are available in the present report. They were prepared using the methodology of S&P Global Corporate Sustainability Assessment (CSA). The methodological notes are in the annex.

This report has not been subject to limited or reasonable assurance by the external auditor of EDP S.A.

The IR&ESG Business Enablement Function (BEF) of EDP S.A. was responsible for compiling and consolidating some of the information presented here as a separate document from the EDP Integrated Annual Report 2024.

This report covers the calendar year 2024 and includes four sections: economic, environmental, social indicators and the annex.

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Scope

The information is provided on a consolidated basis and includes the group's subsidiaries.

Economic Indicators

Suppliers

At EDP, we are working closely with our partners to embed ESG principles and strategic alignment into every stage of our procurement process. Our journey is guided by clear ambitions and a strong sense of purpose.

SUPPLY CHAIN GOALS 2026	UNIT	EDP	TARGET 2026
Suppliers compliant with ESG Due Diligence	%	66	100
Volume of purchases aligned with EDP's ESG goals by 2026	%	59	90

Information Security

The EDP Group obtained ISO27001 certification in 2025, using the latest version (27001:2022) as a reference, for our global Security Operations Center (EDP SOC), which operates 24 hours a day, 7 days a week. This certification reinforces trust with clients and partners while highlighting excellence in real-time monitoring, incident management, vulnerability management, and threat intelligence.

In 2024, within the EDP Group, two potential data breaches were identified due to the publication of source code in a publicly accessible area. However, we are not aware of any impact resulting from breach. Regarding EDP Renováveis (“EDPR”), no occurrences of unauthorized access to information were detected.

Additionally, the company remains focused on raising awareness, having delivered training and security drills to 99% of its employees, emphasizing the importance of enhancing cybersecurity measures and outlining four key approaches to address this:

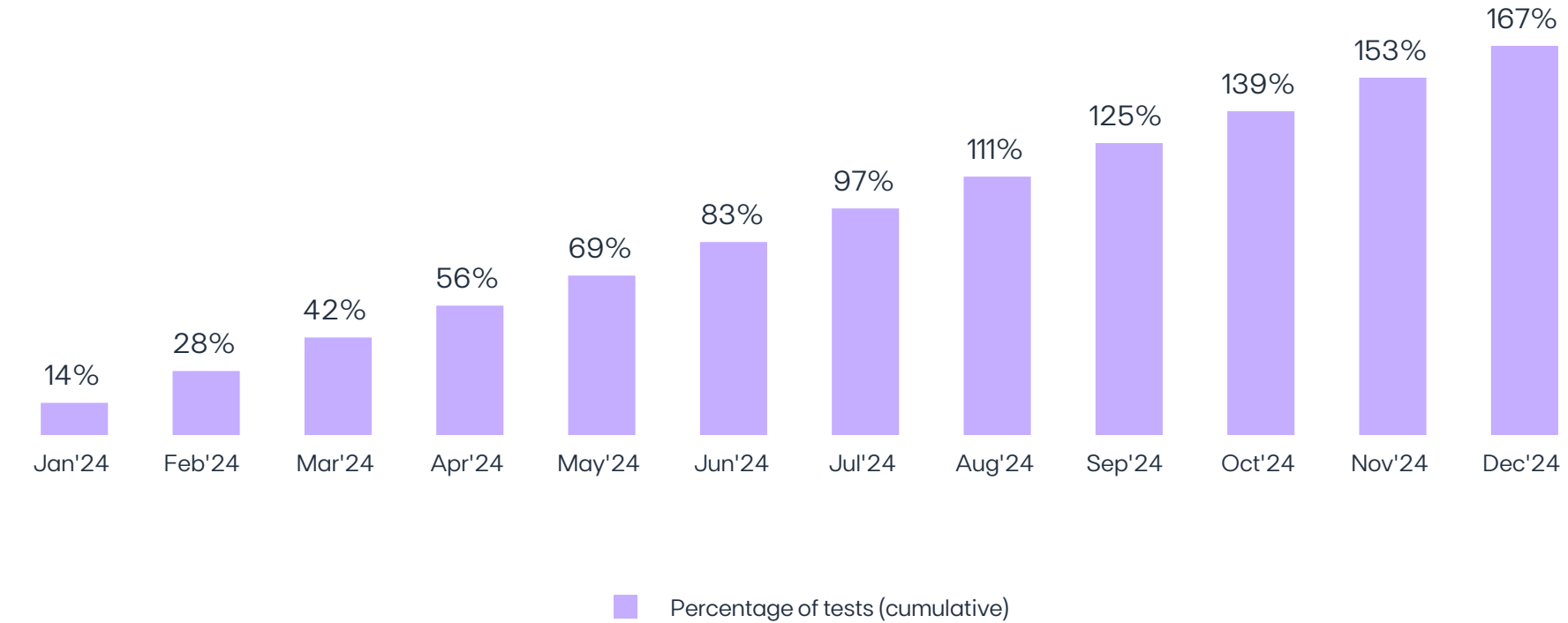
- Effective Communication: Establishing channels and opportunities to communicate regularly and effectively with employees, thereby enhancing their cybersecurity awareness and vigilance.
- Leading by Example: Supporting cybersecurity initiatives and setting the tone for a culture where cybersecurity is everyone's responsibility.

- Expert Knowledge: Ensuring that experts have the tools, training, and resources needed to excel and adapt in a constantly evolving field.
- People-Centred Approach: Aligning with the People & Organization team to develop, promote, and track training initiatives, empowering employees to be the first line of defense.

The Digital Global Unit (“DGU”) conducts annual disaster recovery tests to ensure the effectiveness of the recovery plan, verifying the organization's ability to restore data and applications after disruptions. In 2024, 100% of testable applications within the EDP Group were successfully tested, achieving a 97% success rate on the first attempt and 100% if we consider the second execution.

Additionally, the DGU has business continuity plans to respond to failures in personnel, physical resources, technical resources, or suppliers, which are also tested annually. Regular training and awareness in the context of business continuity are crucial, with three sessions held in 2024 for Technical Leads.

Execution of planned disaster recovery tests



Environmental indicators

Circular Economy

The following table presents EDP’s 2025 targets for advancing the circular economy, focusing on waste reduction, increased recyclability, and enhanced circularity in renewable operations.

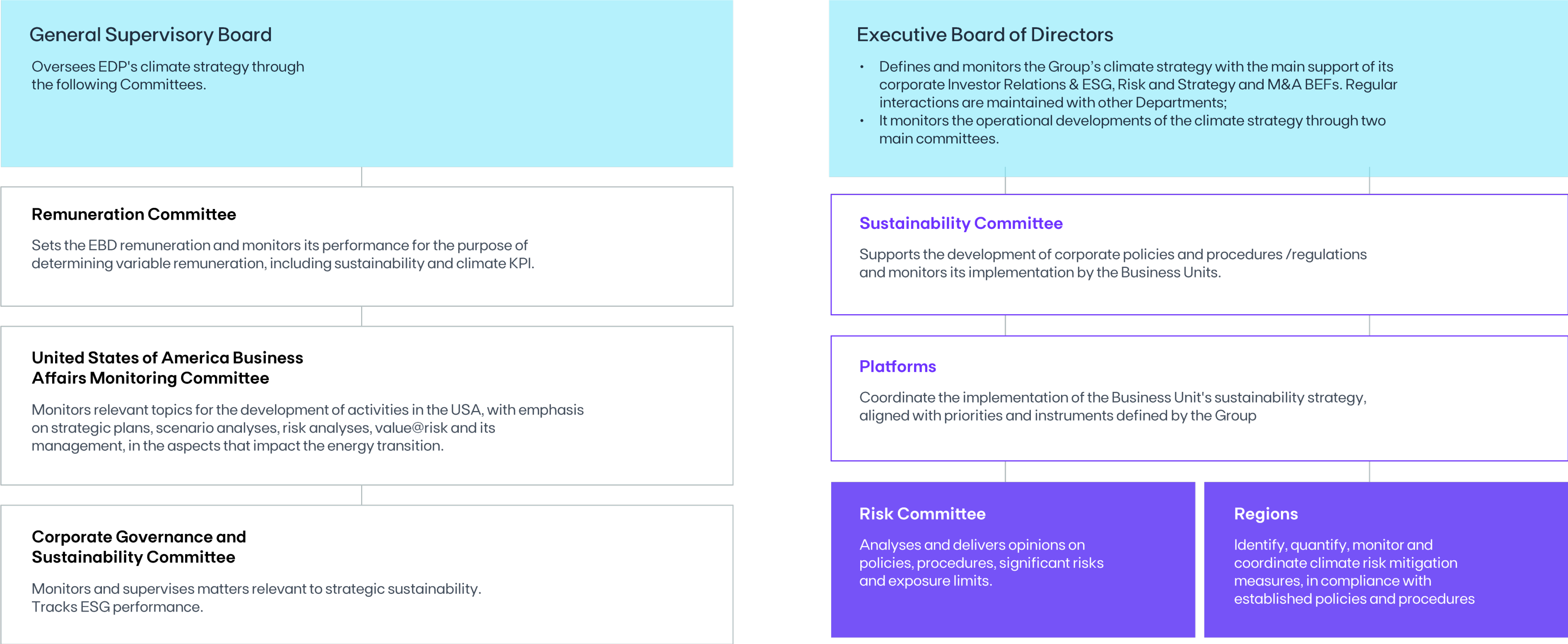
PROMOTING THE CIRCULAR ECONOMY	TARGET 2025
Accelerating circularity in renewables in terms of operational waste and decommissioning	>80%
Reduction of operational waste	-82%
Increased rate of recyclability in the operation	85%

Transmission grid losses

The information below corresponds to the current Group’ business transmission of electricity in Brazil. For more details about this activity consult EDP Integrated Annual Report 2024 ([link](#)).

ELECTRICITY TRANSMISSION GRID LOSSES	UN	2024	2023	2022
Transmission losses	%	0.8	0.8	0.8
Availability	%	99.92	99.94	99.94

Climate Governance



Material external metric

EDP discloses climate-related information in its Integrated Annual Report 2024 in alignment with its strategic objectives and risk management framework. This includes data on:

- Climate change-related impacts (SBM-3_01)
- Associated risks and opportunities (SBM-3_02)

as well as comprehensive reporting on greenhouse gas (GHG) emissions, covering:

- Scope 1, Scope 2, and Scope 3 emissions, and
- Targets and performance metrics used to manage climate-related impacts, risks, and opportunities.

EDP reports against the following metrics:

- E1-4_02: Multi-dimensional tables including baseline year, targets, GHG types, Scope 3 categories, decarbonization levers, and intensity denominators
- E1-4_03 to E1-4_04: Absolute and percentage reduction in total GHG emissions (vs. base year)
- E1-4_06 to E1-4_08: Absolute, percentage, and intensity reductions in Scope 1 emissions
- E1-4_09 to E1-4_11: Absolute, percentage, and intensity reductions in location-based Scope 2 emissions
- E1-4_15 to E1-4_16: Absolute and percentage reductions in Scope 3 emissions (vs. base year).

These disclosures support the evaluation of EDP’s performance on the material topic of Climate Change, with the corresponding output indicator being “Generation from low-carbon sources”.The associated environmental and social impact metrics are presented in the table below.

IMPACT TYPE	OUTPUT METRIC (IMPACT VALUATION)	IMPACT METRIC	IMPACT METRIC EVALUATED IN 2024	METHODOLOGY
Positive	Greenhouse gas emissions avoided (tCO ₂ e)	GHG emissions avoided	GHG avoided from fossil fuel power generation: 27,658,688 tCO ₂ e	Corresponds to emissions that would have occurred if the renewable energy generated had been produced by thermal power plants. It is the sum of CO ₂ avoided in each geography where EDP operates. For each geography, the renewable production (wind and solar) is multiplied by the emission factor of the country's thermoelectric mix.
Positive	Social cost of carbon (€)	Social cost of carbon	Social cost of carbon reduced since people's health impact will be mitigated by reducing GHG emission: 4,647,430,312 €	CEPR's research: https://cepr.org/voxeu/columns/new-way-price-carbon-understanding-social-cost-carbon Using the TFP damages, climate disasters, and climate tipping method of calculation.

Social Indicators

Own Workforce




Our people commitments

EDP is recognized for its unwavering ethical standards and commitment to best practices. The company embraces diversity, ensures the integrity of its actions, and remains true to its purpose.

EDP’s purpose defines the motivation behind its people’s daily work, the values that unite them, and their shared ambition to create a greener future for current and future generations. This purpose is built upon three core pillars:

- **Energy:** translates our strength, our legacy, and what motivates us to continuously deliver green energy
- **Heart:** highlights our people and their key role in delivering our commitments to our customers, partners, and communities
- **Drive:** manifests our ambition and leadership to make change a reality.

Twelve global skills, aligned with these three pillars — Energy, Heart, and Drive — guide EDP in living its purpose every day. These competencies are designed to unlock individual talent and enhance team capabilities, fostering a unified and purpose-driven culture across the organization.

 Energy	 Heart	 Drive
Trustworthiness: We inspire trust, respect, and guide with integrity & ethics our behavior and our interaction with others.	Self-awareness: We are capable of building on strengths and identifying improvement areas, leveraging feedback.	Impact-orientation: We define achievable goals and execute them with responsibility and reliability, taking actionable steps to deliver them.
Problem solving: We translate complex information into impactful actions, taking decisions despite uncertainty.	Collaboration: We proactively seek diverse contributions and work with others to achieve the proposed goals.	Forward thinking: We capture future trends, innovative solutions and challenges, bringing competitive advantage.
Curious learning: We pursue growth opportunities, acquire different skills, and demonstrate an urge to always learn more.	Mindfulness: We recognize the importance of safety, practicing sustainability, and social responsibility.	Courage: We step up to address difficult issues and make tough decisions.
Efficiency: We produce the expected results with the adequate time & resources, acting quickly and working with agility.	Open-mindedness: We are willing to seek and explore different perspectives, experiences, and diverse opinions.	Embracing change: We promote and embrace change as a positive and necessary movement to evolve.

With the common purpose of promoting a unified culture, defining clear guidelines for people management processes and initiatives, and providing a clear and engaging experience for everyone, EDP has established several codes, policies, and principles to ensure fair treatment, safe working conditions, and respect for the rights of all employees. The respect for human rights is guaranteed by a strict compliance of international and national laws where the company operates, complemented by a set of policies and internal procedures, supporting an internal risk assessment, mitigation and remediation practices, whenever needed. Below we presenting the various rules that guide EDP’s labor practices and approach to respecting labor rights: Code of Ethics, Human and Labor Rights Policy, Diversity, Equity, Inclusion & Belonging Policy and Health and Safety at Work Policy.

Code of Ethics

A foundation for Ethical Labour Practices (Approved for the first time in 2005, then revised every two years)

The [EDP Code of Ethics](#) is more than a set of rules—it is a foundational document that expresses the company’s identity, values, and commitment to ethical conduct. It serves as a guiding framework for all **employees, partners, and stakeholders**, outlining the principles that govern behavior and decision-making across the organization.

At its core, the EDP Code of Ethics is structured to articulate the company’s ethical standards for all employees, foster trust-based relationships with external stakeholders, and reflect EDP’s enduring commitment to integrity, respect, and responsibility. It reinforces a shared ethical culture across the Group and serves as a practical guide for navigating ethical dilemmas and making decisions aligned with EDP’s values—especially in a sector undergoing profound transformation.

This ethical foundation is deeply embedded in EDP’s approach to labour practices, which aims to construct better working conditions in accordance the following dimensions:

Employee Well-being

- EDP places people at the center of its decisions, promoting a healthy, respectful, and inclusive work environment
- It supports physical, mental, emotional, social, and financial well-being
- Encourages work-life balance through flexible work models and the right to disconnect
- Promotes volunteering and civic engagement
- Ensures psychological safety and open communication without fear of retaliation

Health and Safety

- EDP aims for “zero accidents” and fosters a strong culture of prevention
- Provides training and awareness on occupational risks and safety procedures
- Empowers employees to refuse unsafe work conditions

- Encourages early identification and support for signs of stress, burnout, or mental health issues

Diversity, Equity, Inclusion, and Belonging

- Commits to non-discrimination in all employment stages: recruitment, training, promotion, and recognition
- Promotes an inclusive culture that values all forms of human diversity
- Encourages intergenerational knowledge and sharing equal opportunities
- Rejects any form of bias, prejudice, or microaggressions

Harassment Prevention

- Zero tolerance for any form of moral or sexual harassment
- Mandatory training and clear reporting channels for victims and witnesses
- Strong protection against retaliation for those who report in good faith
- Promotes a respectful and dignified workplace for all

Human and Labour Rights

- Aligns with international standards (UN, ILO) and applies them across all operations and supply chains.
- Commits to:
 - i. Freedom of association and collective bargaining
 - ii. Elimination of child and forced labour
 - iii. Equal pay and fair working conditions
 - iv. Respect for indigenous and local communities
 - v. Applies due diligence and monitoring mechanisms to ensure compliance.

Freedom of Expression and Participation

- Supports employee participation in workers’ committees and representative bodies.
- Ensures such participation does not negatively impact career progression.
- Encourages open dialogue and active listening by leadership.

These elements of EDP’s Code of Ethics are brought to life through policies, measures, and processes aimed at the effective management of human resources. They reflect EDP’s commitment to Good Labour Practices, as outlined in the following points.

Human and Labor Rights Policy

Framed by [EDP's Human Rights Policy](#) (Approved by the Executive Board of Directors on July 2021), EDP is committed to ensure respect for Human and Labour Rights in the EDP Group’s sphere of activity, implementing the commitments defined in its policies, specifying the international reference treaties and standards and establishing the procedures that ensure compliance with them. The Policy applies to all EDP Group companies, employees, business relationships, and activities in all geographic locations, regardless of local practices or levels of social and economic development. The company aligns its practices with key international frameworks, including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the UN Guiding Principles on Business and Human Rights.

EDP also adheres to the UN Global Compact and integrates specific guidelines for the protection of vulnerable groups, such as children, migrants, people with disabilities, and indigenous communities.

In alignment with the International Labour Organization (ILO) and its core conventions—including:

- The Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
- The Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
- The Forced Labour Conventions (No. 29 and its 2014 Protocol, and No. 105);
- The Minimum Age Convention, 1973 (No. 138);
- The Worst Forms of Child Labour Convention, 1999 (No. 182);
- The Equal Remuneration Convention, 1951 (No. 100);

- The Discrimination (Employment and Occupation) Convention, 1958 (No. 111);
- The Occupational Safety and Health Conventions (No. 155 and No. 187);
- The Holidays with Pay Convention (Revised), 1970 (No. 132); and
- The Termination of Employment Convention, 1982 (No. 158) along with its Recommendation (No. 166)

EDP implements the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy. This ensures the protection of fundamental labour rights, including **freedom of association, the right to collective bargaining, the elimination of forced and child labour, non-discrimination in employment, fair working hours, occupational health and safety, equal remuneration, the right to a living wage**, and the **obligation to consult with worker representatives in a timely and meaningful manner prior to termination decisions**, including provisions for notice periods.

Forced labour	<ul style="list-style-type: none">• Forced Labour Convention, 1930 (No. 29) and its Protocol of 2014; and Forced Labour (Indirect Compulsion Recommendation, 1930 (No. 35);• Abolition of Forced Labour Convention, 1957 (No.105)• Forced Labour (Supplementary Measures) Recommendation, 2014 (No. 203).
Child labour	<ul style="list-style-type: none">• Minimum Age Convention (No.138) and Recommendation (No. 146), 1973;• Worst Forms of Child Labour Convention (No.182) and Recommendation (No. 190), 1999.
Non-discrimination	<ul style="list-style-type: none">• Equal Remuneration Convention (No.100) and Recommendation (No.90), 1951;• Discrimination (Employment and Occupation) Convention (No. 111), and Recommendation (No. 111), 1958.
Freedom of association and collective bargaining	<ul style="list-style-type: none">• Freedom of Association and Protection of the Right to Organise; Convention, 1948 (No. 87)• Right to Organise and Collective Bargaining Convention, 1949 (No. 98);• Collective Bargaining Convention (No. 154) and Recommendation (No. 163), 1981.
A safe and healthy working environment	<ul style="list-style-type: none">• Occupational Safety and Health Convention (No. 155) and Recommendation (No. 164), 1981;• Promotional Framework for Occupational Safety and Health Convention (No. 187) and Recommendation (No. 197), 2006.
Industrial relations	<ul style="list-style-type: none">• Workers’ Representatives Convention, 1971 (No. 135);• Voluntary Conciliation and Arbitration Recommendation, 1951 (No. 92);• Co-operation at the Level of the Undertaking Recommendation, 1952 (No. 94);• Communications within the Undertaking Recommendation, 1967 (No. 129);• Examination of Grievances Recommendation, 1967 (No. 130);

Employment promotion	<ul style="list-style-type: none">• Employment Policy Convention (No. 122), and Recommendation (No. 122), 1964;• Employment Promotion and Protection against Unemployment Convention (No. 168) and Recommendation (No. 176), 1988;• Employment Policy (Supplementary Provisions) Recommendation, 1984 (No. 169);• Job Creation in Small and Medium–Sized Enterprises Recommendation, 1998 (No. 189);• Promotion of Cooperatives Recommendation, 2002 (No. 193).
Equality of treatment	<ul style="list-style-type: none">• Workers with Family Responsibilities Convention (No. 156) and Recommendation (No. 165), 1981;• HIV and AIDS Recommendation, 2010 (No. 200).
Security of employment	<ul style="list-style-type: none">• Termination of Employment Convention (No. 158) and Recommendation (No. 166), 1982
Training	<ul style="list-style-type: none">• Human Resources Development Convention, 1975 (No. 142);• Human Resources Development Recommendation, 2004 (No. 195)
Conditions of work	<ul style="list-style-type: none">• Protection of Workers’ Claims (Employer’s Insolvency) Convention (No. 173) and Recommendation (No. 180), 1992;• Workers’ Housing Recommendation, 1961 (No. 115);• Reduction of Hours of Work Recommendation, 1962 (No. 116).
Occupational safety and health	<ul style="list-style-type: none">• Working Environment (Air Pollution, Noise and Vibration);• Convention (No. 148) and Recommendation (No. 156), 1977;• Protocol of 2002 to the Occupational Safety and Health Convention, 1981;• Occupational Health Services Convention (No. 161) and Recommendation (No. 171), 1985;• Asbestos Convention (No. 162) and Recommendation (No. 172), 1986;• Safety and Health in Construction Convention (No. 167) and Recommendation (No. 175), 1988;• Chemicals Convention (No. 170) and Recommendation (No. 177), 1990;• Prevention of Major Industrial Accidents Convention (No. 174) and Recommendation (No. 181), 1993;• Safety and Health in Mines Convention (No. 176) and Recommendation (No. 183), 1995;• Safety and Health in Agriculture Convention (No. 184) and Recommendation (No. 192), 2001;• Radiation Protection Recommendation, 1960 (No. 114);• Guarding of Machinery Recommendation, 1963 (No. 118);• Benzene Recommendation, 1971 (No. 144);• Occupational Cancer Recommendation, 1974 (No. 147);• List of Occupational Diseases Recommendation, 2002 (No. 194).
Social protection	<ul style="list-style-type: none">• Social Security (Minimum Standards) Convention, 1952 (No. 102);• Employment Injury Benefits Convention, 1964 [Schedule I amended in 1980] (No. 121);• Medical Care and Sickness Benefits Convention (No. 130) and Recommendation (No. 134), 1969;• Social Protection Floors Recommendation, 2012 (No. 202).
Governance	<ul style="list-style-type: none">• Labour Inspection Convention, 1947 (No. 81);• Labour Inspection (Agriculture) Convention, 1969 (No. 129);• Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144).

Indigenous and tribal peoples	<ul style="list-style-type: none">• Indigenous and Tribal Peoples Convention, 1989 (No. 169).
Particular categories of workers	<ul style="list-style-type: none">• Plantations Convention (No. 110) and Recommendation (No. 110), 1958;• Maritime Labour Convention, 2006, as amended.

EDP’s Human and Labor Rights Policy defines internal processes and responsibilities to ensure due diligence, stakeholder consultation, grievance mechanisms, and training. **This policy extends to all business partners and suppliers**, who are expected to uphold the same ethical standards.

The company maintains a zero–tolerance policy toward any form of human rights violation and encourages the use of its Speak Up channel for reporting concerns, with full assurance of confidentiality and protection against retaliation.

Finally, the company pledges to adopt the OECD Due Diligence Guidance for Responsible Business Conduct, committing to carrying out a comprehensive due diligence process on human rights across its direct and indirect operations. This includes analyzing, identifying, and assessing actual and potential impacts, implementing measures to prevent and mitigate such impacts, and conducting periodic reviews and communicating the due diligence processes it establishes.The Company is also committed to establish whistle–blowing and complaint channels and to engage with its supply chain to ensure that it has the same measures in place.

Collective Labor Agreements related to respect of human rights of workers

EDP has established several **collective labor agreements** with structures representing workers, primarily in Portugal, Brazil, and Spain. Employees have the right to form workers' committees within each company to defend their interests and rights, as provided for in the Constitution and the laws of each country. Trade unions and employees also have the right to engage in union activities within the company, including through delegates, union committees, and inter–union committees. The unions maintain a direct channel of communication with employees to listen to their demands and address any questions regarding potential requests that may be included in the collective labor agreements during the negotiation process.

These dynamics for managing labor and union relations have enabled the effective management of various aspects crucial for the continuous improvement of working conditions and business sustainability. Examples of topics within the scope of social agreements or measures implemented within this framework include:

- Mechanisms to guarantee transparency and equity – EDP, through its business enablement functions, guarantees a set of practices, processes and routines aimed at ensuring aspects of pay

- equity, adequate and living wages such as 1) benchmarks from several strategic market analysis partners, 2) remuneration analyses at all stages of the annual compensation cycle to ensure gender pay equity and 3) the annual budget exercise includes gender pay aspects for the possible correction of unjustified pay disparities.
- Managing working hours, working arrangements, and labor rights – The management of working hours and arrangements is fundamental to guaranteeing decent and safe conditions for employees. This is ensured through internal platforms for recording hours, absences, and annual leave, allowing for monitoring and, where applicable, payment. Additionally, EDP adopts a proactive approach to managing potential unused annual leave, encouraging employees to take advantage of their rights to rest. With regard to non-voluntary terminations, due to their particular context and impact, in addition to strict compliance with the legislation in each country, EDP provides additional support and protection measures for the employees impacted. To support the transition phase and the search for other professional opportunities, EDP offers outplacement services and health insurance, for a limited period.

Policy of Diversity, Equity, Inclusion and Belonging

[EDP’s Diversity, Equity, Inclusion and Belonging \(DEIB\) Policy](#) (Approved by the Executive Board of Directors for the first time in 2023, then revised in 2017 and 2022) is a cornerstone of its broader commitment to ethical and responsible labour practices. It reinforces the principles already embedded in the company’s Code of Ethics and Human and Labor Rights Policy, ensuring that all employees are treated with fairness, dignity, and respect.

- Employee Well-being – DEIB promotes a culture where individuals feel safe to be themselves, contributing to psychological safety, engagement, and overall well-being.
- Health and Safety– By fostering inclusion and belonging, EDP creates safer, more supportive environments where all employees are empowered to speak up and care for one another.
- Non-Discrimination and Equal Opportunity – The DEIB Policy explicitly supports non-discrimination in all employment stages and promotes equity in access to opportunities, aligning with ILO conventions and EDP’s labour rights commitments.
- Harassment Prevention – DEIB reinforces zero tolerance for harassment and microaggressions, encouraging allyship and proactive intervention.
- Freedom of Expression and Participation – The policy encourages open dialogue, inclusive leadership, and employee participation in shaping a more equitable workplace.

- Human and Labour Rights – DEIB is aligned with international standards (UN, ILO), ensuring that diversity and inclusion are not only values but also rights protected across the organization and its supply chain.

Health and Safety at Work Policy

[EDP’s Health and Safety at Work Policy](#) (approved by the Executive Board of Directors on the 28th July 2020) reflects its strong commitment to protecting the well-being of all individuals involved in its operations—**employees, contractors, suppliers, and other stakeholders**. Safety is not just a compliance requirement but a core value embedded in every aspect of the company’s activities.

This policy directly supports EDP’s broader labour commitments by:

- Protecting Employee Well-being – Reinforcing physical and mental health as part of a safe work environment.
- Empowering Workers – Upholding the right to refuse unsafe work and encouraging open communication.
- Promoting Equity – Ensuring that all employees, regardless of role or location, benefit from the same high safety standards.
- Fostering Inclusion – Creating a workplace where everyone feels secure, respected, and valued.
- Supporting Human Rights – Aligning with ILO principles on occupational health and safety as a fundamental labour right.

Recognition

The commitment to the best labour management practices, in the various aspects that impact employees in their day-to-day lives, is recognized, for instance, by the Fundación Másfamilia through the recognition of EDP as family-responsible company (efr). This certification – which the company has received since 2013 gained a global dimension in 2023, obtaining, for the first time, the efr certification with level B, a certification process that requires 3 audit moments during 2023–2025.

This certification reflects the EDP Group's commitment to the well-being of its people, through the implementation of measures and policies that promote balance and reconciliation between the

personal and professional lives of employees, contributing to the construction of a true culture of care.

Another example of this commitment is the recognition of EDP as a Top Employer by the Top Employers Institute, a global entity that evaluates and recognizes the best human resources management policies, highlighting the EDP Group's strong positioning with candidates and employees and its dedication and commitment to attracting and retaining the best talent.

Empowering people to drive a better tomorrow

Through the three pillars (Energy, Heart and Drive) and its twelve competencies, EDP aims to positively shape the employee experience across the entire journey—from recruitment to daily work and professional development.

Onboarding

EDP is committed to ensuring that every new employee feels welcomed, supported, and inspired to contribute to a better tomorrow. As a growing multinational organization, EDP recognizes that joining the Group can be both exciting and challenging. To address this, the company has developed a comprehensive onboarding experience designed to provide a strong and engaging start. This experience is structured into two components: global and local, ensuring consistency while respecting regional specificities.

Learning, Development and Mobility

Performance

EDP's global development mindset is based on a 360° holistic assessment of the employee, considering their past individual performance, their present skills, and their agility to face future challenges.

- Performance

Reflecting on this dimension involves looking back at the past, assessing the level of execution of the defined objectives and the individual contribution to achieving them. Each year, the individual performance result is calculated based on the weight of four dimensions: three collaborative (group, platform/business unit, area) and one individual, according to the employee's professional segment. The assessment of the individual contribution begins with a reflection by the hierarchy and the

employee, based on four objective questions that help to put into perspective how much and how they have contributed to achieving the objectives. This assessment places the employee on a qualitative performance scale ("you are not there"; "you are on the right track"; "you are going the extra mile"; "you are leading the way"), geared towards development. To guarantee a culture of meritocracy, it is essential to distinguish different levels of performance and ensure that all employees know their level of contribution. In this sense, and in line with EDP's ambitious strategic objectives, "you are on the right track" is considered a good performance, where most employees should position themselves. Employees can go against this trend, with those who still have room to improve and live up to what is expected of them and those who have demonstrated higher-than-expected levels of contribution. This differentiation allows for more consistent, fair, and transparent performance management, reflected in the employee's career path and recognition

- Skills

EDP's purpose is embodied in 12 human skills, and it is essential that each employee at EDP can map their most and least developed skills to identify individual and business development opportunities, ensuring that they have the necessary tools to meet EDP's ambition. This skills assessment is qualitative and is based on the feedback and perception of different people – the employees themselves, direct manager, colleagues and direct reports (where applicable) – allowing each employee to identify up to three strengths and areas for improvement that will guide their development.

- Agility

The best way to be prepared for the future is to ensure agile and continuous learning, which translates into a daily effort to adapt and which allows us to develop the skills we need for tomorrow. In this sense, agility represents the combination of different transversal dimensions that bring value to the organization and prepare us to face the challenges of the future, such as learning, growth, impact and influence.

This mindset is supported by regular development conversations between managers and employees, whose completion, usefulness, and agility are monitored internally to promote a culture of feedback, proximity, and trust, as well as by a new learning and development experience led by each person according to their needs and which enables access to thousands of on-demand content.

Development Programs

For a true culture of learning and development to thrive within the organization, it is essential to foster an environment that encourages curiosity, autonomy, and knowledge sharing among employees in diverse and impactful ways:

- Experience

The most frequent and natural component of learning in daily work, which in 2024 led to 5.8% of internal mobility cases and the continuation of initiatives such as the Your Board program — now in its fourth edition, involving 22 participants from different nationalities and EDP Group companies.

- Sharing

Where collaboration plays a central role. In 2024, this was visible through:

- The launch of the Global Mentoring Program, a structured six-month initiative designed to activate and develop human skills, support employee growth, and prepare future leaders. By connecting mentors and mentees across countries, business areas, and roles through a digital matching platform, the program fosters continuous learning and collaboration. It creates space for experienced employees to share their journeys, encourage skill-building, and strengthen internal networks across the EDP Group.
- The definition and implementation of a coaching framework, available at individual, team, and group levels.
- 1:1 Coaching supports leaders in addressing specific challenges or preparing for transitions, promotions, or strategic growth.
- Team Coaching helps optimize team dynamics, communication, and performance, particularly in times of change.
- Group Coaching offers a space for employees with shared goals to exchange experiences and develop collectively.
- The creation of the Pride Employee Resource Group, a global network of employees from various regions, committed to promoting awareness, inclusion, and dialogue around LGBTQIA+ topics within the EDP Group. This group fosters a safe and open environment to share ideas, reflect on challenges, and support one another.

- EDP Communities: Through EDP Communities, it is possible to develop transversal skills, as well as knowledge about EDP’s business value chain. In a 100% digital dynamic environment, it is possible build synergies with colleagues, stay updated on major news, challenges, and trends, and develop employees.

- Training

With over 13,000 learning and development participants in 2024 across the EDP Group, our training initiatives are continuously evolving. We have reinforced global access to on-demand learning through platforms such as Udemy, resulting in more than 14,000 hours of training delivered.

Additionally, we continue to invest in digital reskilling and upskilling initiatives, ensuring that employees are equipped with future-ready capabilities to navigate the accelerating digital transformation.

- Leadership Development: Recognizing that our leaders are key to delivering our strategy in a fast-changing world, we have established a leadership model that defines clear expectations and is structured around three core dimensions: Lead Yourself, Lead Others, and Lead for the Future. This model, based on 15 essential competencies, underpins a culture of leadership that empowers people to inspire and grow their teams. As part of this strategy, we delivered leadership development programs such as Lead First, focused on equipping new leaders with the right mindset and skills to lead effectively. The most recent edition concluded in 2024 with a remarkable Net Promoter Score (NPS) of 71, reflecting the program’s strong impact and relevance.
- People & Culture: We believe that to build a healthy and inclusive work environment, it is essential to invest in continuous training on topics such as diversity, equity, inclusion, and well-being. Our learning offerings are designed to equip employees with the tools and skills necessary to foster an environment of mutual respect, collaboration, and work-life balance. By supporting individual growth, we strengthen a more cohesive organizational culture, prepared to face the challenges of the future. EDP offers the following courses:
 - i. Unconscious Bias – potential situations of unconscious bias in employees’s day-today life and define strategies to overcome situations where this bias is identified.
 - ii. Diversity and Inclusion and Well being – reinforces the social and economic value of people with disability, promoting gender equality and unconscious biases.
 - iii. Well being – contents related to a healthy mind, the art of connecting with the body, invest in financial freedom and secrets to social well-being.

EDP also has specific development programs for contractors namely regarding Heath & Safety programs, which covered in 2024 12,552 awareness actions, 57.282 contractors and 61.294 hours.

Mobility

EDP has been fostering internal mobility for the past years, which is a powerful tool for both company and employees, and it is fundamental for attracting and retaining employees.

There are currently three types of mobility opportunities at EDP to meet the expectations and needs of employees, with clear eligibility criteria:

- Definitive mobility

A definitive internal movement (internal recruitment) for employees with a permanent contract from all professional segments, with the requirements of seniority equal to or greater than two years in their current position and a performance evaluation equal to or greater than "you're on the right track"

- Temporary mobility

A project or management role that takes place over a short period of time (up to one year) for employees with a permanent contract from all professional segments, with the requirements of seniority of 2 years or more in their current role, a performance evaluation equal to or higher than "you're on the right track" and not having carried out any mobility in the last 12 months

- Project

An initiative in which the employee participates simultaneously with the performance of their original role, allocating a maximum of 20% of their time (up to 9 months part-time) and for which they are eligible if they have already completed their probationary period.

Compensation & Benefits

The Global Compensation Framework is the model that establishes a common compensation strategy at the EDP Group, aligning local practices with a global policy that promotes transparency, equity, and meritocracy, by clarifying compensation concepts, organizational segments, and how they relate to the job family matrix and the different career paths.

This model, widely communicated to all employees, establishes a clear relationship between concepts relating to basic salary, short- and long-term incentives, benefits and perks.

The benefits and perks component is available to all employees through the Benefits & Perks Guidebook, organized by country into 8 clusters: 1) Family support & New parents, 2) Work & Flexibility, 3) Time-off, 4) Learning & Development, 5) Transports & Sustainable Mobility, 6) Retirement, 7) Offers, discounts & Personal finance, and 8) Health & Well-being.

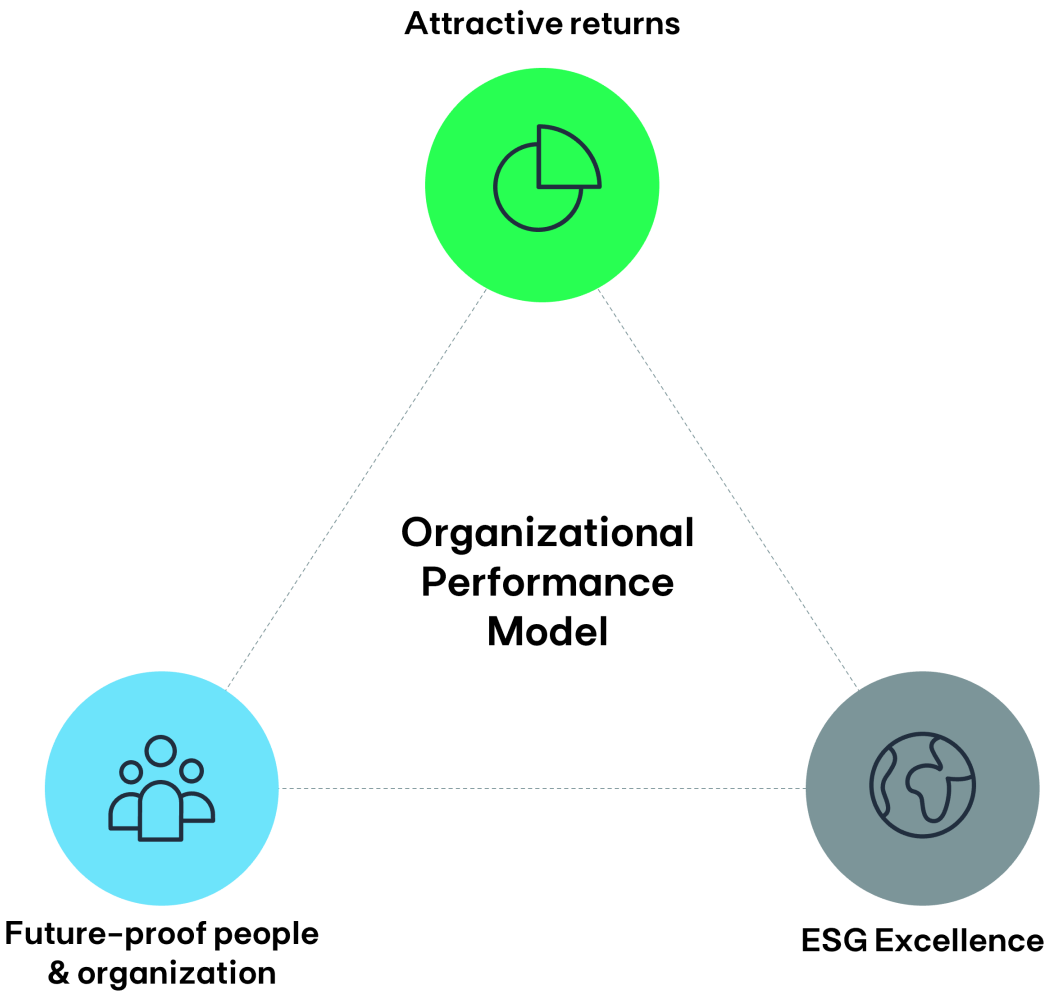
Some initiatives that aim to reinforce ongoing transparency and pay equity are: 1) the availability of all information on the global compensation model in a fixed place on the company's intranet page, 2) e-learning on the model that can be accessed at any time by all employees, 3) best practice guidebooks for managers and P&O Business partners, 4) payslips and annual statements such as the Total Employee Package available on demand in the same tool or, 5) Benefits and Perks Guidebook by country, with clear information on eligibility and instructions for use.

Organizational Performance & KPI

EDP continues to strengthen its position as a global leader in the energy transition by setting clear and ambitious goals to help shape a sustainable future. In a rapidly changing world, and in alignment with the long-term vision outlined in its Business Plan, EDP annually defines specific objectives and key performance indicators (KPIs) to manage organizational performance.

With the implementation of the new organizational model throughout 2024, it became necessary to temporarily adapt the structure of the performance model to simplify the evaluation process and ensure the effective measurement of the Group's main results. Consequently, in 2024, organizational performance was measured through two dimensions – Group and Specific KPIs – temporarily replacing the platform, region, business unit, and area dimensions used in previous years.

Regarding the Group's KPIs, the organization's performance is composed of three strategic axes:



Attractive Returns (60%)

The current economic environment, with volatile energy prices and strong regulatory intervention to protect consumers, poses challenges in terms of generating returns. To be successful, it is critical to ensure global alignment in terms of the investment-debt balance to continue to grow in a sustainable way, maximizing our result.

- Group KPIs: Recurring Net Profit, Total Shareholder Return (TSR), Funds From Operations (FFO) / Net Debt, Recurring Cash Operating Expenses (OPEX).

ESG Excellence (20%)

Ensure excellence in the different ESG strands, namely Environment, Social and Governance, to achieve our business transition objectives in a sustainable way.

- Group KPIs: Sustainability Performance Index, Customer Satisfaction Survey, Reputation Performance Index, Ethics & Compliance, BitSight Cybersecurity Rating.

Future-proof People & Organization (20%)

To become a future-proof company, EDP needs to continue evolving to be increasingly global, agile and efficient, with talented and empowered people in an increasingly digital workplace, where diversity is seen as a driver for innovation and inclusion, flexibility and well-being are a priority.

- Group KPIs: Climate Survey – Empowerment & Engagement, % Women in Workforce & Leadership, Reactive and Proactive Safety Indicators, Digital Acceleration Index.

In terms of the Specific KPIs, those have specific typology and are applicable according to the employee's role in five possible dimensions, guaranteeing a view of the performance of platforms, regions, business units and support or business areas.

- Specific KPI typology: Global Business Enablement Functions (BEF), Group Financial KPI, Delivery Financial KPI, Delivery L2 Area Specific KPI, delivery BU Specific KPI and New Organizational Model Implementation KPI.
- Enablement Functions – 1) Center of Excellence (COE)/ Transversal Business Enablement Functions (BEF) employee and 2) Business Partners employee.
- Delivery Functions – 3) Platform/Region Delivery employee, 4) Business Unit Delivery employee and 5) Platform/Region/BU Lead employee.

The performance model is designed to assess and enhance employee contributions towards the organization's goals. The model encompasses performance indicators related to various risk areas, including safety, digital, financial and compliance. Here are a few examples of Specific KPI:

- Risk Management – Management Survey, DJSI – risk management, Policies and risk limits, Global risk committees, CRMI – counterpart risk;
- Safety, Security & Business Continuity – Completion of the Security activity plan, Completion of the Crisis Management and Business Continuity activity plan, Completion of the Safety activity plan;
- Investor Relations & ESG – CDP Performance (EDP Carbon Disclosure Project performance in 2024)

- Networks Portugal and Spain – Climate Action Execution Plan

The weight of each performance dimension (Group and Specific) in the employee's individual result varies according to their professional segment and level of responsibility, unlike the weight of the individual contribution assessment, which remains the same regardless of segment, 25%.

In line with EDP’s annual results and the individual contribution of each employee to achieve EDP ambitious goals, every year the company reward its employees for their performance through Short-Term Incentives as the annual Bonus. The Bonus value varies according to two factors:

- The company’s results achieved, which will impact the total amount of budget available.
- The employee’s individual result, calculated through the KPIs results and the Individual Contribution of the employee via Holistic Assessment.

By doing so, it ensures a comprehensive approach that aligns with the organization's strategic objectives and standards of excellence. Employees contribute to this model by striving to meet and exceed these performance indicators in their tasks, thereby directly influencing their performance evaluations and the corresponding short-term incentives. This approach not only motivates employees to perform at their best but also promotes a culture of accountability and continuous improvement within the organization.

KPIs EBD – Short Term Incentives				
	KPI name	Chief Executive Officer	Other Executive Board Members	Type
Financial	Growth – Earnings per share recurring	Yes	Yes	Incentive/performance bonus linked to short term financial and non-financial objectives (linked to the budget), assessed annually. More details here: EDP Remunerations Report
	Shareholder remuneration – Total Shareholder return vs Eurostoxx utilities	Yes	Yes	
	Balance sheet solidity – Funds from Operations/Net Debit	Yes	Yes	
	Operational efficiency – Recurring Cash OPEX	Yes	Yes	
Non-financial	ESG indicators			
	Dow Jones Sustainability Index Results	Yes	Yes	
	Performance in the employees’ yearly climate study	Yes	Yes	
	Performance in the customer satisfaction index	Yes	Yes	

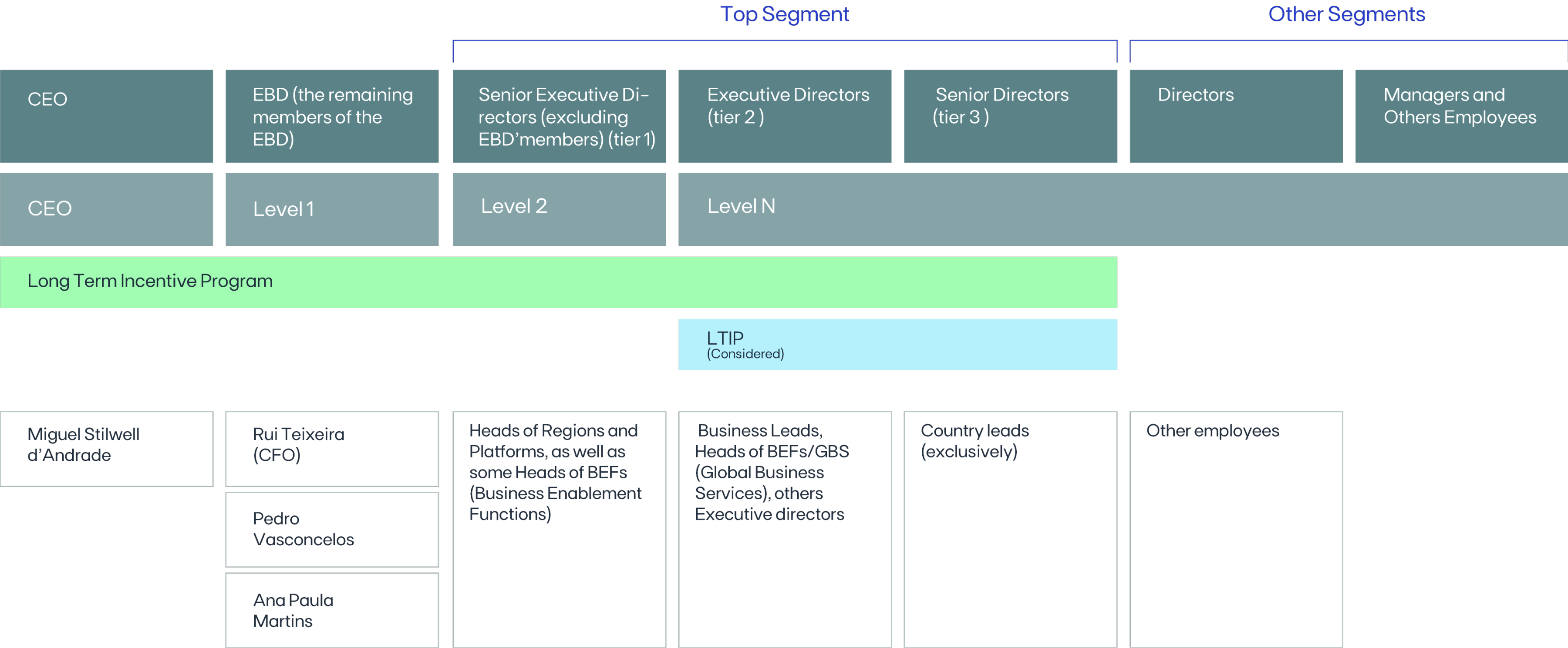
KPIs Other Employees – Short Term Incentives		Other employees	Type
Group KPIs	Attractive Returns	Recurring Net Profit	Annual Bonus
		TSR	
		FFO/Net debt	
		Recurring Cash OPEX	
	Future-Proof People & Organization	Health Index: Organizational Climate Survey: Empowerment & Engagement	
		Diversity & Inclusion: % Women in Workforce & Leadership	
		Safety / Health: Reactive Safety Indicator (Colabs & PSEs Accident Frequency Rate; Total Accident Severity Rate Colabs & PSEs)	
		Safety / Health: Proactive Safety Indicator (Safety Preventive Observations; Qualifying Safety Training)	
		Digital: Digital Acceleration Index	
	ESG Excellence	Sustainability Performance Index ¹	
		Customer Satisfaction Index	
		Reputation Performance Index	
		Ethics & Compliance	
		BitSight Cybersecurity Rating	
Specific KPIs (examples for some Platforms)			
Networks	Climate action execution plan	Yes	Annual Bonus
Specific KPIs Regions (some examples)			
Iberia/EU/SA/NA/APAC	MW additions	Yes	Annual Bonus

Specific KPIs (examples for some BEFs)			
BEF KPIs Risk	DJSI risk management: Result in the Risk Management criteria of DJSI for EDP	Yes	Annual Bonus
	Policies and Risk limits: All risk policies and limits updated by end of year	Yes	
	Global Risk Committees: Fulfillment of Risk Committee plan according with governance model (excluding RGA that needs implementation)	Yes	
	CRMI Counterparty Risk: Full scale implementation of CRMI (go live in new policy all across the Group)	Yes	
BEF KPIs Safety, Security & Business Continuity	Completion of the Security activity plan	Yes	
	Completion of the Crisis Management and Business Continuity activity plan	Yes	
BEF Investor Relations & ESG	Completion of the Safety activity plan	Yes	
	CDP Performance: EDP Carbon Disclosure Project performance in 2024	Yes	

¹S&P CSA; MCSI, ISS Quality score and Sustainalytics KPI's are part of the “Sustainability Performance Index” KPI

EDP globally assigns long-term incentive plans (LTI) to the Executive Directors and specific senior business-related positions. The Executive Board of Directors (EBD) considers the attribution of these incentives as a tool for attracting and retaining talent, focusing on achieving results and complying with the business plan.

For detailed information on the EBD’s LTI structure, please refer to the 2024 Remuneration Report [\[link\]](#).



¹Top segment
Determine the strategy of a platform or global policies according to the Group's strategy and lead strategic complex operations or corporate functions. Manage a broad scope of resources and are directly accountable for the main results of the Group and/or integrate several competencies which are critical to the Group's success. Focus on long-term strategic thinking while addressing complex or non-standardized problems that require adaptation and new solutions.

²Other Segments
Determine the strategy of a business unit or ensure the implementation of global policies. Manage broad scope of resources and are directly accountable for the main results of a platform and/or integrate critical competencies generally related in nature and purpose. Focus on mid-term strategic thinking while addressing complex, sensitive and non-standardized problems that require adaptation and new solutions.

Well-Being

EDP recognizes that well-being is fundamental to the performance of the organization, its teams, and each individual. For this reason, the company places people at the center of its decisions, actively listening to their needs and promoting initiatives that foster a balanced and healthy work environment.

EDP's Well-being Strategy seeks to meet the five major goals: 1) promote a global well-being experience, 2) lead by example, 3) focus on and promote physical and emotional well-being, 4) promote a useful, balanced and easily accessible well-being offer, and 5) communicate a vivid and engaging story.

Thus, in order to achieve these objectives, this strategy is organized around 5 dimensions of well-being – physical, emotional, social, professional, and financial.

All employees have some essential resources available on-demand on the AboutMe (HCM platform) or on the intranet page:

- Benefits & Perks Guidebooks per country which includes all the available benefits and instructions for activation and use.
- Annual Total Employee Package Statement which is a document that visually represents EDP's investment in basic salary, variable components and benefits.

For each dimension, EDP offers a set of benefits and perks and supports employees in various aspects of their personal and professional lives, health and well-being:

- Employee benefits

Psychological support lines, well-being talks, workshops and mental health promotion campaigns, volunteering initiatives, financial advisory services, or services and products discounts.

- Work conditions

EDP is committed to foster a healthy work culture – one that goes beyond just digital and physical aspects to encompass well-being. The work experience is designed around the *where* and *how* everyone works. On the *Where*, employees can work on-site, in the office and/or remotely. EDP has been significantly investing to improve the work space by creating spaces that inspire employees to collaborate, to connect, innovate and grow, through a more open and inclusive space. On the *How*, EDP implemented a hybrid work model, allowing employees whose jobs are compatible with remote

working to have the opportunity to work remotely up to two days a week. Also, the Flex Fridays are a flexibility and voluntary measure to make working hours more flexible, consisting of the possibility for employees to adapt their weekly working hours, allowing them not to work on Friday afternoons, in compliance with the guidelines applicable to each region.

- Family benefits

Family support initiatives aim to support employees on their journey to becoming parents or caregivers and include measures such as: paid parental leave for the first or second caregiver, 15 days' leave prior to the expected date of birth, parking for pregnant women in the third trimester of pregnancy, New Parents Guidebook, Welcome Birth Offer, lactation and parental care spaces. Some of these initiatives are only available locally.

Employee Listening

Knowing the needs, expectations and perceptions of our people is fundamental to continuing to build a more humane, healthy and inclusive work environment.

To foster this culture of feedback and transparency, where all employees feel comfortable speaking openly and expressing their opinions, EDP has been reinforcing psychological safety in the teams, as well as its active listening strategy by promoting regular development conversations and responding to the Organizational Climate Study – a tool that provides an annual overview of the organization.

Through a comprehensive questionnaire, the Organizational Climate Study gathers employees' perceptions across 17 key dimensions, evaluated on a scale from 1 (strongly disagree) to 5 (strongly agree): engagement, empowerment, clarity of direction, collaboration, development opportunities, diversity and inclusion, ethics and integrity, flexibility (for compatible roles), direct management, compensation and benefits, performance management, quality and client focus, resources and support, safety, social responsibility, well-being and survey action. Each dimension comprises various questions, such as “I feel proud to work for EDP”, “My work gives me a sense of personal accomplishment”, “My job makes good use of my skills and abilities”, “The stress levels at work are manageable”, among others, making up a total of 71 questions.

Conducted with an external digital platform, the methodology enables analysis of the annual evolution of indicators, internal comparisons, and comparisons with the market, namely general industries, companies within EDP’s sector and high-performing companies, allowing the organization to identify areas of high satisfaction and uncover opportunities for improvement, to enhance the employee experience on a global, regional, and team level.

Customers

Customer satisfaction is tracked regularly as part of our commitment to continuous improvement, with a target of surpassing a satisfaction score of 77.

SATISFACTION MEASUREMENT	UN	2021	2022	2023	2024	Target
Satisfaction measurement	%	71.2	71.70	74.00	77.30	77.30
Data coverage	%	100	100	100	100	

Community Relations

Stakeholder Engagement

A deep process of shared value, purpose and public commitments to earn the Social License to Operate is permanently developed, implemented, monitored and corrected. The following examples are just some evidences to different levels of approach, respect and common evolution that EDP implements, believes and tracks:

Through its [Policy and Procedures for Local Stakeholder Engagement](#), EDP evidences its commitment on listening, communicating, adapting towards Human Quality of Life, meeting its stakeholders aspirations and acknowledging all impacts inflicted, in order to either avoid further damages or mitigate the changes inflicted while enforcing the energy transition.

The definition of communities includes mapping the vulnerabilities, identifying all types of vulnerable stakeholders, specifying the type of approach needed, as for Indigenous People. The policy defines its Governance, indicating the Board of Directors as responsible for the stakeholder management, and the stakeholder team at group level (now Regulation, Markets and Stakeholder Management (RM&S)) responsible for monitoring , reporting and promoting the action plans accordingly.

At the Local Stakeholder Engagement Procedures, "Objective" defines "All teams representing EDP must align their behavior with the Group's ESG commitments. All suppliers must follow the same path, in accordance with the sustainability requirements practiced transversally in procurement and contracting. It is an objective of the EDP Group that the entire supply chain should be committed to this evolution, and this Procedure, which is a result of the Local Stakeholders Engagement Policy,

embodies the methodology for its application on a local scale, in the best interest of Community Rights.

The Local Stakeholder Engagement Procedures are designed to ensure that EDP’s communication channels are not only effective but also continuously evolving to support deeper, more meaningful local engagement. These procedures provide a structured framework for strengthening dialogue, collecting relevant information, and aligning actions with community needs and expectations.

The document outlines the governance structure, monitoring and reporting mechanisms, and the tools and formats used for stakeholder dialogue and consultation. It includes detailed guidance on stakeholder identification and profiling, the typology of applicable measures (mandatory and voluntary), and the minimum information required for engagement plans. It also defines the types of plans expected at each project phase and provides templates and annexes to support implementation and reporting.

A key component of the procedures is the grievance mechanism (section vii), which is thoroughly detailed to ensure that all project-related complaints are addressed fairly, promptly, and transparently, with clear escalation protocols and protection against retaliation.

Action Plans must be tailored to each phase of the project lifecycle, ensuring that engagement is relevant and responsive to the evolving context. The annexes included in the document offer practical tools—such as summary tables and reporting templates—that help teams navigate the process with clarity and consistency.

In line with the EDP Local Stakeholder Engagement Policy, conducting a local stakeholder impact assessment is a mandatory step prior to any operational phase changes. This ensures that potential impacts are identified and addressed early. To support this, clear and accessible communication channels must be established in advance, enabling communities to engage safely and effectively with the company.

Monitoring the relationships established and evaluating the effectiveness of programs and their mechanisms are core components of the Local Stakeholder Engagement Procedures. These procedures emphasize listening, building communication channels, and managing expectations—specifically through (ii) Communication for Stakeholder Engagement, which promotes transparent, culturally appropriate, and timely information sharing; (iii) Listening to Stakeholders, through structured consultations such as interviews, surveys, and public hearings to understand community expectations and concerns; and (vii) the Establishment of a Grievance Mechanism, which ensures that all project-related complaints are addressed fairly, promptly, and without retaliation, supported by clear escalation paths and defined response timelines. Together, these practices are designed to

build trust, enhance accountability, and foster long-term, constructive relationships with local communities.

Communication for Stakeholder Engagement (ii)

- Purpose – Communication is a core principle of EDP’s stakeholder engagement strategy. It must be culturally appropriate, transparent, and consistently applied by all EDP representatives and partners.
- Key Principles:
 - i. Expectation Management (a) Stakeholders must understand how and when their input will influence decisions; b) Mismanaged expectations can damage trust and relationships.
 - ii. Responding and Sharing Information: Responding and Sharing Information; Listening is essential, but responding is equally important; Proactive, timely, and consistent communication builds trust; Share updates on project phases and operations regularly.

Communication Standards

- Maintain open channels with directly affected stakeholders
- Share project information in accessible formats and languages
- Communicate objectives and activities transparently
- Provide timely updates on key operations
- Respond promptly to inquiries
- Publish summaries of stakeholder meetings and engagement reports/newsletters

Dialogue Tools

EDP may use a variety of tools to engage stakeholders, including:

- One-on-one meetings
- Focus groups

- Public sessions and workshops
- Site visits
- Flyers and brochures
- Dedicated phone lines and email addresses
- Letters and surveys

Listening to Stakeholders (iii)

- Use structured consultations (e.g., interviews, surveys, public hearings)
- Document interactions, especially with Politically Exposed Persons (PEPs)
- Topics to explore include:
 - i. Stakeholder attitudes
 - ii. Perceived benefits and risks
 - iii. Affected groups
 - iv. Preferred communication channels
 - v. Legal and regulatory concerns

Grievance Mechanism (vii)

- Purpose – To ensure that all project-related complaints are addressed in a consistent, transparent, and non-retaliatory manner, complementing the broader EDP Speak-Up Channel.
- Key Process Steps
 - i. Initial Resolution Attempt – Stakeholders are encouraged to first resolve concerns directly with their primary project contact.
 - ii. Formal Complaint Submission – If unresolved, a written complaint should be submitted to the Regional Stakeholder Manager Focal Point; If still unsatisfied, the issue can be escalated to the Director of Corporate Stakeholder Management.

- iii. Complaint Requirements – Must include: Clear description of the issue; Parties involved; Summary of actions taken; Proposed resolution.
- iv. Response Timeline – Acknowledgment within 5 business days; Final response within 30 calendar days
- v. Escalation Protocol – If unresolved at the regional level, the issue may be escalated to the Executive Board of Directors (EBD) via the Corporate Stakeholder Management team.
- vi. Responsibility – The relevant EDP team must assess the likelihood and impact of the issue and act with appropriate urgency.

Case Study: Serra da Borborema

The launch of the series “For Whom the Winds Blow,” created by the organizations Cáritas and Misereor, took place in early 2022. The series explores the impacts of wind farms in Brazil’s Northeast region. It features testimonies from individuals negatively affected by these projects, as well as academics who oppose their implementation.

In addition, local and labor movements began organizing in the Serra da Borborema project area to resist the installation of wind farms. One example is the Marcha das Mulheres da Borborema, which received media coverage. Last year, there was a noticeable increase in negative news about wind energy developers, along with the emergence of opposition movements. In this context, there is growing concern about the start of construction on EDP’s project.

The Serra da Borborema Wind Complex

This region includes 15 municipalities in the semi-arid zone of the state of Paraíba, in Brazil’s Northeast. EDP’s area of influence in the region includes three municipalities: Areial, Montadas, and Pocinhos. There are 11 communities directly affected by the project: Pedra Redonda, Lagoa Salgada, Lagoa do Catolé, Três Lagoas, Lagoa Comprida, Serrote Branco, Bom Jesus, Bom Nome, Vila Baixa Grande, Sítio Cabeça do Boi, and Chocalheira.

The Wind Farm

The Serra da Borborema Wind Complex, developed by EDPR, has a total installed capacity of 124 MW. Construction was scheduled to begin in December 2023, with commercial operation expected by July 2024.

Socioeconomic and Environmental Perception Assessment

Field research was conducted in September 2022 by Gaja Socioenvironmental Consulting, managed by EDP’s Environmental/Social department.

The methodology involved qualitative, sample-based field interviews to gather local perceptions about the project.

The study also explored lifestyles, income sources, land relationships, social conflicts, and other indicators that could influence the company’s operations in the region.

Negative Perceptions (often due to misinformation or lack of knowledge)

- Environmental degradation
- Risks of mental health issues and hearing loss caused by wind turbine interference
- Fear of losing rural retirement benefits if land is leased for turbine installation
- Degradation of the Caatinga biome due to new road construction
- Noise from wind turbines reducing native wildlife presence
- Electromagnetic interference risks
- Loss of land access for farming and daily activities

Community Demands

- Support for livestock, agriculture, and goat farming
- Support for sisal production and processing
- Acquisition of agricultural machinery
- Drilling of wells and repair of cisterns
- Professional training for economically active youth and adults (to address unemployment)
- Courses focused on family farming

Three-Step Response Plan

Development of Social Programs and Projects

- Define the scope and focus of social programs. Proposal: basic professional training project
- Structure and implement applicable EDPR social projects in the region
- Promote incentivized social projects
- Establish partnerships

Prepare ad-hoc content

- Key Messages: Ongoing updates on the company’s messaging, social engagement, projects, and sensitive topics
- Create a coordinated and consistent narrative aligned with the broader energy sector
- Spokesperson Training Plan: Organize workshops for any EDPR employee who interacts with local communities

Communication Plan

- Tailored and localized communication strategy
- Ally plan (indirect communication): partnerships with universities and educational institutions to provide explanations and clarifications on behalf of EDPR, helping ensure the communication is perceived as impartial

In Brazil, [the Social Interaction and Communication Program of the São Manoel Hydroelectric Plant](#) (UHE São Manoel) is a core component of the Basic Environmental Project (PBA) and supports the broader Environmental Management Plan.

Given the need to maintain effective communication with all stakeholders in the plant’s area of influence, this program is directly or indirectly connected to nearly all other environmental programs. It ensures that preventive, mitigating, and compensatory actions are widely understood and transparently communicated.

Key Objectives

- Ensure transparent dissemination of project information to both internal and external audiences
- Establish trust-based relationships with directly affected communities
- Provide standardized, consistent communication through authorized spokespersons
- Support other environmental programs with tailored communication strategies
- Create feedback mechanisms for questions, complaints, and suggestions
- Promote social participation and enable the re-evaluation of environmental actions when necessary

Mitigation Through Communication

The Environmental Impact Assessment (EIA) identified several potentially negative impacts that require communication as a mitigation tool, including:

- Real estate speculation and land value inflation
- Increased demand on infrastructure (education, water supply, waste management, housing)
- Rise in prostitution
- Loss of land and property improvements

The program also supports communication efforts related to induced monitoring and pressures on biodiversity and conservation areas.

Geographic Scope

The program covers:

- Paranaíta and Alta Floresta (MT)
- Southern Jacareacanga (PA)
- Focus on the Directly Affected Area (ADA), Direct Influence Area (AID), and Indirect Influence Area (AII)

Implementation Strategy

- Active during planning, construction, and pre–operation phases
- Includes public meetings, printed materials, media campaigns, and a dedicated grievance mechanism
- Public meetings are held semiannually in the first year and annually thereafter

Communication Actions

- General awareness campaigns via radio, newspapers, and flyers
- Targeted outreach to landowners affected by resettlement and compensation
- Ongoing updates on construction progress, health risks, road changes, and job opportunities
- Health and social campaigns, including prevention of child exploitation and gender–based violence.
- Grievance mechanism (toll–free number, email, physical office).
- Surveys to assess public awareness and understanding.

Stakeholder Engagement

- Creation of a Working Group with representatives from civil society, local governments, IBAMA, and the Public Prosecutor’s Office
- Subgroups address specific audiences (e.g., affected landowners, internal staff, surrounding communities)

Performance Indicators

- Number of communication events held
- Response time to complaints and inquiries
- Volume of informational materials produced and distributed

Recommended Partnerships

- Local governments, NGOs, unions, and community associations.
- Integration with other environmental and social programs under the PBA.

The Social Interaction and Communication Program is an integral part of the Indigenous Component of the Basic Environmental Plan (PBAI), developed within the framework of the environmental licensing process for the São Manoel Hydroelectric Plant. Its objective is to facilitate dialogue and establish and maintain communication mechanisms with the traditional Apiaka, Kayabi, and Munduruku peoples, located in the lower Teles Pires region. The program aims to ensure the proper dissemination of information about the project, keeping the Indigenous population informed about the plant’s operations.

Given the need to maintain communication channels with all stakeholders within the territorial context of the São Manoel HPP’s area of influence, the program is directly connected to nearly all activities proposed in the other components of the PBAI. This is because the preventive, mitigating, and/or compensatory actions being implemented must be widely known and understood by everyone within the program’s coverage area. The table below presents selected examples of actions and performance indicators implemented as part of the Indigenous Social Interaction and Communication Program under the São Manoel Hydroelectric Plant (UHE São Manoel).

GOAL	INDICATOR	STATUS
Develop and implement the Social Interaction and Communication Plan by EESM in partnership with Indigenous communities	Indigenous Social Interaction and Communication Plan developed in partnership with Indigenous peoples and implemented by EESM.	Apiaká: Completed Kayabi: Completed Munduruku: Completed
Donation of aluminum boats (“voadeira” type) with 40 HP engines to villages located along the Teles Pires River to enable community participation in PBAI activities	Supumber of aluminum boats (“voadeira” type) with 40 HP engines delivered to villages along the Teles Pires River to enable participation.	Apiaká: Completed (13 boats and 40 HP engines delivered) Kayabi: Completed (12 boats and 40 HP engines delivered) Munduruku: Completed (27 boats and 40 HP engines delivered)
Install communication frequency (Channel 2, frequency 6927) in the radio systems of all villages, with operating hours (7 a.m. – 9 a.m.) agreed upon with the Indigenous communities	ACommunication frequency installed by EESM in village radio systems, with schedule agreed upon with the communities.	Completed (for all villages)
Meet the target of five (5) days to respond to Indigenous population inquiries	Number of updated records of questions, complaints, and suggestions, according to Indigenous community demands.	Apiaká: 10 Kayabi: 10 Munduruku: 6
Maintain an updated record of demands from the Indigenous population	Response time for Indigenous community demands.	Within 5 business days
Provide immediate response to urgent demands	Response time for urgent Indigenous demands.	Immediate

In a north American community approach, posters were hand in hand and locally distributed through the community and online shared, to educate local population on the energy transition and the operation to come ([Emerald Bluffs Solar Park](#)).

EDP maintains continuous engagement and capacity-building efforts within the communities impacted by its operations, ensuring permanent communication and trust-building. The [E-Redes DRILL](#) for regional communities is a good example of building trust from within. Internationally, the Gumisan Community Program in Korea stands out: a donation scheme of KRW 150 million per village at Ready-to-Build (RTB) stage, plus KRW 10 million per village annually for 20 years. These funds are

managed by a single association representing all five villages, which then distributes the resources among registered households.

In Brazil, a similar approach is seen in Rio Grande do Norte, where EDP implemented a shared value and stakeholder engagement strategy during the construction of another wind farm.

Case Study: Itaúna and São Domingos Wind Complex (2024–2025)

- Population: 2,499 residents
- Critical Issue: Community impact due to the transit of heavy machinery on local infrastructure (urban and rural roads)

Main Complaints from Stakeholders

- Damage to public and rural roads caused by increased vehicle traffic
- Social Risk:
- Potential work stoppages and restricted access due to infrastructure damage

Management Measures

- Implementation of a joint action plan between EDP and Agaspar (the civil construction company for the Itaúna & São Domingos complex) to restore affected roads
- Formal request for participation in a Public Hearing with EDP and local council members in Pedra Preta, broadcast live to all residents (scheduled for July 2024)

Lessons Learned

- The importance of prior mapping, active listening, and proactive management
- Detailed road and access studies and the establishment of traffic routing plans
- Preventive technical inspections of homes to address potential structural damage
- Stakeholder mapping to identify and engage affected groups

- Establishment of a grievance mechanism via in-person service and WhatsApp
- Integrated coordination between the social team and the construction team of the wind complex

South America has alias a most recent best practice to be shared, as the Chilean team developed a protocol of cooperation with local communities, making its goals and commitments public and trackable (Parque Eólico Victoria SpA).

Communication channels are always in place—for example, the ABC News website features a [link](#) to an open house event where discussions with residents about the planned solar park are shown. This commitment to transparency and clear communication is also reflected in how [EDP California](#) maintains a dedicated Facebook page to engage with the local community.

This communication being in place strengthens the capacity-building efforts implemented at EDP Renováveis, as demonstrated by the activities deployed in North America—see the [Emerald Bluffs Solar Park](#) project for an example. Further details can be found in [EDP’s Integrated Annual Report 2024](#) (ESRS S3).

At the "Affected Communities" area of [EDP’s Integrated Annual Report 2024](#) (ESRS S3), EDP discloses the assessments done locally and their efficiency from the population perspective (S3-1_01; S3-1_02; S3-1_03) decisions or activities and programs aimed at mapping impact, meeting people's concerns (S3-1_01; S3-1_02; S3-1_04; S3-1_05; S3-4_03; S3-4_07; S3-4_08; S3-4_09); the assessment of perspectives of affected communities (e.g. on indigenous communities, S3.SBM-3_07; S3-1_01; S3-1_02; S3-1_03; S3-2_01; S3-2_02; S3-2_06; S3-2_07; S3-3_14; S3-3_15; S3-3_18; S3-3_19; S3-5_03; S3-5_04; S3-5_05); when engagement occurs, type and frequency (S3-2_03; S3-4_07; S3-4_08); the communications built (S3-3_10, S3-3_11, S3-3_12, S3-3_13, S3-3_14, S3-3_15, S3-3_18, S3-3_19) Tracking grievances, defining aligned remedy for impacts and that specific channels are in place for the affected communities to raise concerns(e.g. of ref 110 ext , the speak up channel (S3-3_11 -2, S3-3_12, S3-3_13, S3-4_04, S4.SBM-3_07, S4.SBM-3_08, S4-2_02, S4-2_04, S4-2_05); as well as third party mechanisms accessible to all (S3-3_14, S3-3_15, S3-3_18, S3-3_19). The process of grievance's privacy and anonymous profile (S3-3_20, S3-3_21), developing into the positive impacts through programs provided in 2024 (S3.SBM-3_01; S3.SBM-3_02; S3.SBM-3_03; S3.SBM-3_04; S3.SBM-3_05; S3-4_15; S3-4_16). Surveying impacts achieved and stability of methodologies are also stated (S3-4_04; S3.MDR-T_01-13; S3-5_01; S3-5_02).

Social Investment

EDP develops several CSR initiatives in the communities impacted by its operations that create a positive impact on those communities.

In 2024, EDP invested over €28 million in social impact initiatives across the globe. This investment supported 529 organizations and positively impacted approximately 2 million people, including 1.5 million direct beneficiaries and 425,000 indirect beneficiaries.

The model used by EDP to measure and report its social investment and community impact is the **B4SI framework – Business for Societal Impact**.

EDP reports the following outcome indicators:

- **Impact on people**
 - i. Depth of impact – enables to assess the degree to which beneficiaries are better off as a result of the activity, identifying three distinct levels of change: a) connect; b) improve ; c) transform.

DEPTH OF IMPACT	DETAIL	DIRECT BENEFICIARIES (#)
Connect	The number of people reached by an activity who can report some limited change as a result of the activity (e.g. raised awareness of opportunities to improve literacy skills)	5,670
Improve	The number of people who can report some substantive improvement in their lives as a result of the activity (e.g. actually able to read better)	66,389
Transform	The number of people who can report an enduring change in their circumstances, or for whom a change can be observed, as a result of the improvements made (e.g. got a job as a result of improved literacy)	49,090
Total beneficiaries with impact measurement		121,149

- ii. Type of impact – enables to map the area(s) in which an activity has benefited the people it has reached:

TYPE OF IMPACT	DETAIL	DIRECT BENEFICIARIES (#)
Behavioral/Attitudinal Change	The activity helped people make behavioral changes that can improve the person's life or life chances or has it challenged negative attitudes or preconceptions, enabling them to make wider, different or more informed choices	66,389
Skills	The activity helped people to develop new, or improve existing, skills to enable them to develop academically, in the work place and socially	67,442
Quality of Life/Well-being	The activity helped people to be healthier, happier or more comfortable (e.g. through improved emotional, social or physical well-being)	110,862

• Impact on community organizations

The framework also enable to understand the degree to which a beneficiary entity or partner organization has: **a) improved existing / delivered new services; b) reached more people or spent more time with clients; c) improved management processes; d) increased their profile; e) taken on more staff or volunteers.**

• Environmental impact

The methodology evaluates the degree of environmental improvement through direct intervention, as well as the impact and extent of positive changes in people's behavior regarding environmental issues across the following dimensions:

- i. Direct environmental impact – Does the activity generate direct ecological benefits, such as land/water conservation, species protection, or biodiversity improvement?
- ii. Impact on environmental behavior – Has the activity encouraged people to conserve energy or water, or to make other positive changes in their environmental behavior?

(Additional information in [EDP’s Social Impact Report 2024](#))

• Impact on EDP’s volunteers

The B4SI methodology also allows for the evaluation of changes in employees' attitudes, behaviors, and/or skills as a result of participating in company-supported volunteer activities, across the following key areas:

- i. Professional skills – Employees can develop their professional skills in various ways through volunteering. Some activities focus on job-related essential skills, while others foster the development of soft skills such as communication, teamwork, and leadership abilities.
- ii. Personal impact – Employee involvement in volunteer activities can have a significant personal impact, reflected in areas such as self-confidence, job satisfaction, and pride in being part of the company.
- iii. Behavioral change – Participation in volunteer activities can positively influence employees' behavior, for example, by inspiring them to engage in volunteering again or increasing the likelihood of staying with the company.

(Additional information in [EDP’s Social Impact Report 2024](#))

This structured approach ensures that EDP’s social investment is strategic, measurable, and aligned with global standards, particularly the UN Sustainable Development Goals (SDGs).

Community impact

Our Key Impact Areas are shown in the following table.

KEY IMPACT AREAS	DETAIL	CONTRIBUTIONS (M€)
Education	Skills development and renewable energy education	1.4
Health	Support for healthcare institutions and research	0.09
Economic Development	Access to energy and entrepreneurship	1.9
Environment	Conservation and climate action	2.5
Arts & Culture	Access to and preservation of cultural heritage	10.7
Social Well-being	Energy poverty reduction and inclusion	5.4
Emergency Aid	Disaster relief in affected countries	0.4

Beneficiary Profile

The beneficiary profile includes the following table: Vulnerable groups (e.g., low-income families, elderly, minorities)

BENEFICIARY PROFILE		BENEFICIARIES (#)
Children and students		217,289
People with health issues		8,368
People affected by emergencies		18,116
Other disadvantaged groups		1.17 M

IMPACTS HIGHLIGHTS	
Energy Access	Solar installations in underserved communities, reducing energy costs and CO ₂ emissions.
Energy Poverty	Over 820 home renovations improving thermal comfort by 28%.
Volunteering	3,019 unique volunteers contributed over 26,000 hours, benefiting 49,236 people
Sustainable Development Goals (SDGs)	€12.8M (55% of total) aligned with SDGs, benefiting 1.1 million people.

Annex

1. Indicators

Workforce breakdown: Gender

Workforce breakdown: Gender	UN	2024	Target 2026
Share of women in total workforce		%	2931
Share of women in all management positions, including junior, middle and top management		%	2631
Share of women in junior management positions, i.e. first level of management		%	2331
Share of women in top management positions, i.e. maximum two levels away from the CEO or comparable positions		%	2731
Share of women in management positions in revenue-generating functions (e.g. sales) as % of all such managers		%	13
Share of women in STEM-related positions		%	916

Hiring Breakdown

OWN Workforce	UN	2024
New entries	#	950
Professional category		
Technicians	#	305
Specialists	#	613
Supervisors	#	26
Senior Management	#	6
Gender		
Male	#	501
Female	#	290
Not declared	#	159

OWN Workforce	UN	2024
Age Group		
<30	#	417
[30-50 [#	486
≥50	#	47
Nationality		
Angola	#	1
Brazil	#	292
Canada	#	1
Chile	#	3
China	#	18
Colombia	#	2
France	#	15
Germany	#	30
Greece	#	2
Hungary	#	1
India	#	4
Ireland	#	1
Italy	#	16
Japan	#	4
Malaysia	#	3
Mexico	#	3
Myanmar	#	3
Poland	#	27
Portugal	#	202
Puerto Rico	#	1
Romania	#	5
Singapore	#	21
Spain	#	73
Taiwan	#	1
United Kingdom	#	6
United States	#	189
Vietnam	#	7
Netherlands	#	1
Honduras	#	1
Belgium	#	3
Philippines	#	1
Turkey	#	2
Australia	#	4

OWN Workforce	UN	2024
Palestine, State of	#	1
Ecuador	#	1
New Zealand	#	2
Haiti	#	1
Iran, Islamic Republic	#	2
Vacancies filled by internal candidates	%	32.67

Turnover Breakdown

OWN Workforce	UN	2024
TURNOVER	%	10.95
Professional category		
Technicians	%	10.56
Specialists	%	11.63
Supervisors	%	7.77
Senior management	%	10.31
Nationality		
Bolivia	%	100
Brazil	%	11.43
Chile	%	8
China	%	48.72
Colombia	%	28.57
France	%	21.43
Germany	%	38.71
Greece	%	8.11
Hungary	%	45.45
India	%	4.35
Italy	%	16.31
Korea (the Republic)	%	20

OWN Workforce	UN	2024
Malaysia	%	24.24
Mexico	%	12.5
Morocco	%	25
Myanmar	%	12.5
Peru	%	100
Poland	%	16.77
Portugal	%	7.83
Romania	%	16.28
Singapore	%	34.46
Spain	%	7.12
Syrian Arab Republic	%	100
Taiwan	%	37.5
Ukraine	%	16.67
United Kingdom	%	22.73
United States	%	20.22
Indonesia	%	25
Netherlands	%	37.5
Honduras	%	100
Philippines	%	100
Australia	%	37.5
Vietnam	%	40
Gender		
Male	%	10,7
Female	%	11,6
Not declared	%	8,0
Age group		
< 30	%	17,9
[30-50[%	8,4
≥ 50	%	13,5
VOLUNTARY EMPLOYEE TURNOVER	%	5.1

2. Methodological Notes

INDICATOR	STANDARD				NOTES
	DISCLOSURE	NUMBER	NAME	# QUESTION	
Materiality Metrics for External Stakeholders	CSRD	IRO-1	Materiality Assessment Process	1.3.5 Materiality Metrics for External Stakeholders	page#
Risk&Crisis Management	CSRD	SBM-3	Material Risks and Opportunities	1.4.2 Risk Management Process	page #
Suppliers	CDP	5.11.6, 8.14	Environmental requirements that suppliers have to meet as part of the organization's purchasing process	1.7.3 Supplier Screening	page 6
Information Security	CSRD	GOV-1; SBM-3	Governance Bodies Role, Key Actions, Metrics and Material Impacts Risks & Opportunities	1.8.3 Information Security Management Programs	page#
Circular Economy	CSRD	E1-3 , GOV-1 and GOV-2	Key Actions, Governance Bodies Role and Board Sustainability Oversight	2.5.5 Climate Governance	page#
Transmission grid losses					
Climate strategy					
Climate strategy	CDP	4.5; 4.5.1; 7.55.3	Monetary incentives for the management of environmental issues	2.5.7 Climate-Related Management Incentives	page#
Product Stewardship	CDP	7.33; 7.33.1	Transmission and distribution business	2.7.2 Electricity Transmission & Distribution Losses	page#
Labor practices	UNGC	G2, G3, L1.1	Businesses should make sure that they are not complicit in human rights abuses Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining L1.1) requires businesses to support and respect internationally proclaimed human rights	3.1.1 Labor Practices Commitment	page#
Labor practices	UNGC	HR6, L12, L3, L5	Businesses should uphold the elimination of discrimination in respect of employment and occupation relevant practical actions the company has taken during the reporting period and/or plans to take to implement the labour rights principles Businesses should uphold the effective abolition of child labour	3.1.2 Labor Practices Programs	page#
Human Capital Management	CSRD	BP-2 , S1-1 and S1-4	Phase-In Provisions, Labour Practices, Actions to Manage Impacts and Key Actions	3.3.2 Employee Development Programs	page#
				3.3.6 Long-Term Incentives for Employees	
Human Capital Management	CSRD	BP-2, S1-15 and S1-4	Phase-In Provisions, Family-related Leave, Actions to Manage Impacts, and Key Actions	3.3.7 Employee Support Programs	page#
Human Capital Management	CSRD	BP-2 and S1-4	Phase-In Provisions and Key Actions	3.3.8 Type of Performance Appraisal	page#

INDICATOR	STANDARD					NOTES
	DISCLOSURE	NUMBER	NAME	#	QUESTION	
Human Capital Management	CSRD	BP-2, S1-2, S1-3, S1-4 , S1-5 and SBM-2	Phase-In Provisions, Engagement Process, Remediation, Key Actions, Targets and Stakeholder Engagement	3.3.9	Trend of Employee Wellbeing	page#
Customers	CSRD	BP-2 , S4-5 and SBM-2	Phase-In Provisions, Targets and Stakeholder Engagement	3.5.1	Customer Satisfaction Measurement	page#
Stakeholder Engagement	GRI	413	Local Communities	3.7.3	Stakeholder Engagement Programs	

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