



# EDP Group Supplier Code of Conduct

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## 2. OBJECTIVE

EDP Group's Supplier Code of Conduct specifies the ethical standards and responsible business practices expected from our suppliers.

## 3. SCOPE

The EDP Group's Supplier Code of Conduct applies to suppliers, suppliers' subsidiaries, affiliates, subcontractors, and sub-tier suppliers that supply or intend to supply goods or services to any company within the EDP Group, which includes all entities in a control or group relationship with EDP.

This Code of Conduct does not apply when it is contrary to applicable law, regulations or current contractual provisions, nor does it add or derogate from new rights. Its provisions and standards are supplementary in nature. Where national legislation and EDP's standards differ, the highest standard will apply.

## 4. REFERENCES

EDP's is deeply committed to respecting the following company-wide policies and international standards.

### *Internal References*

Available at EDP's website

- Code of Ethics;
- Integrity Policy;
- Human Rights Policy;
- EDP Safety Policy;
- Environmental Policy.

### *External References*

- OECD Due Diligence Guidance for Responsible Business Conduct;
- United Nations Guiding Principles on Business and Human Rights (UNGPs);
- Ten Principles of the UN Global Compact;
- International Labor Organization (ILO) Conventions.

## 5. TERMS AND DEFINITIONS

<b>Due diligence:</b>	Process through which companies identify, prevent, mitigate, and account for how they deal with the actual and potential negative impacts on the environment and people linked to their activity. This includes the company's own activities and its upstream value chain (e.g., suppliers, subcontractors, etc.) and downstream (customers, offtakers, etc.).
<b>Traceability and Chain of Custody:</b>	The ability to track the origin and journey of goods and services through the supply chain, ensuring transparency and accountability from raw materials to final delivery.
<b>Conflict-Affected and High-Risk Areas:</b>	Geographic regions experiencing armed conflict, widespread violence, or other risks to human rights and governance, requiring enhanced due diligence by companies operating in or sourcing from these areas.
<b>Critical and Conflict Minerals:</b>	Minerals that are essential to modern technologies but often sourced from regions with human rights abuses or environmental harm. Suppliers must trace their origin and ensure responsible sourcing.

<b>Integrity</b>	A guiding principle of EDP's actions, based on high ethical standards, legal compliance, and anti-corruption, as defined in the EDP Integrity Policy.
<b>Human Rights</b>	Fundamental rights recognized internationally, including the UN Guiding Principles, ILO Conventions, and OECD Guidelines, which must be respected throughout the value chain.
<b>Labor Rights</b>	Workers' rights, including freedom of association, collective bargaining, fair working conditions, equality, and non-discrimination.
<b>Health and Safety</b>	A set of practices and standards aimed at ensuring safe and healthy working environments, in line with legislation and EDP's Health and Safety Policy.
<b>Environmental Protection</b>	Actions to prevent, mitigate, and compensate for environmental impacts, promoting efficient resource use and biodiversity conservation.
<b>Climate Impact</b>	The assessment and management of climate change risks and impacts, including emissions mitigation and adaptation strategies.
<b>Local Communities</b>	Social groups affected by business activities, whose rights, interests, and development must be respected and promoted.
<b>Transparency and Collaboration</b>	Principles of good faith, openness, and cooperation between suppliers and EDP, essential for ethical and sustainable contractual relationships.
<b>Core Equipment</b>	Key equipment supplied to EDP that is essential for the successful implementation of its Business Plan.

## 6. DESCRIPTIONS AND RESPONSIBILITIES

Suppliers of the EDP Group companies, are expected to:

### **6.1 Due Diligence**

#### **6.1.1 Evaluation and monitoring**

a) Conduct sustainability and integrity due diligence, proportional to their level of risk, covering all the topics of this Code, in their own operations and supply chain; implement appropriate mitigation and remediation measures and communicate transparently the results to EDP.

b) Have adequate risk management systems and controls in place to ensure compliance with the Code or agreed equivalent standards. The functioning and quality of the supplier's management system should be in proportion to the size, complexity and environment of the supplier's business.

c) Support EDP, and/or a third party authorized by the company and reasonably acceptable to the supplier, to conduct audits and assessments of the supplier's operations relevant to the Code, including but not limited to the supplier's facilities. At the supplier's request, the parties involved in any such audit shall enter into a confidentiality agreement regarding the circumstances disclosed in the audit or assessment.

#### **6.1.2 Traceability and chain of custody**

a) Strive to establish, traceability and/or chain of custody to the source or processing location of goods supplied to EDP Group companies, ensuring that risks are identified, and appropriate mitigation and remediation measures are implemented throughout the supply chain.

b) For core equipment with high human rights risk, establish a system of controls to show the chain of custody, identifying upstream suppliers from raw materials to the finished product supplied to EDP Group companies. Suppliers shall provide relevant supply chain mapping data to EDP or a recognized third-party organization.

##### **(i) Critical and conflict minerals**

a) Take appropriate steps to identify the use of critical and conflict minerals in their supply chain, establish traceability or chain of custody to their source or processing location, and ensure risks are identified and appropriate mitigation and remediation measures are implemented.

b) Share relevant information on the origin of critical and conflict minerals and any assessments upon request.

##### **(ii) Conflict-Affected and High-Risk Areas**

a) Assess whether their own operations or supply chains are located in or sourced from conflict-affected and high-risk areas and, in such regions, adopt due diligence measures.

b) Adopt due diligence measures, in such areas, to identify and mitigate risks, ensuring appropriate remediation actions are implemented.

c) Share relevant information on their due diligence efforts and risk assessments upon request.

### **6.2 Ethics and Compliance**

a) Promote and respect the highest ethical, moral and human integrity standards, with customers, suppliers and local communities promoting relationships of trust through integrity and transparent acts.

#### **6.2.1 Laws and regulations**

a) Ensure full compliance with all applicable national and international laws, regulations, and standards relevant to the contractual relationship with the EDP Group. This includes, but is not limited to, regulations concerning privacy and data protection, anti-bribery & corruption, unbundling and other sector-specific rules, antitrust, environmental protection, health and safety, intellectual property, and any contractual agreements with EDP Group companies.

### 6.2.2 Integrity

#### (i) Anti-bribery and corruption

a) EDP has zero tolerance against corruption and bribery acts and it is prohibited any kind of practice of corruption and bribery, actively or passively, public or private, through acts or omissions, including the creation and maintenance of situations of favoritism through facilitation payments or other irregularities.

b) Not offering or accepting any form of gift or benefit in the context of their business relationship with the EDP Group. This includes, but is not limited to, cash, cash equivalents, entertainment, gift cards, discounts, hospitality, or participation in non-business-related events.

#### (ii) Conflict of Interest

a) Ensure that, in situations of potential conflict of interest involving the company, employees, or partners, mechanisms are implemented to ensure impartiality and fairness in actions and decision-making processes as well as the independence of the supplier's actions.

b) Inform, through the e-mail [compliance@edp.com](mailto:compliance@edp.com), of the existence of potential conflicts of interests in relations with the EDP Group, whether of a business or personal nature.

#### (iii) Money Laundering

a) Ensure respect and compliance with current legislation and regulations regarding the prevention of money laundering and the financing of terrorism (PML-CFT) applicable to the different activities and jurisdictions in which the supplier operates.

#### (iv) Sanctions

a) Not to invest, lend, contribute, partner, act, or develop activities with or for the benefit of any person, entity, or country that is subject to international sanctions. These include restrictive measures adopted by countries, regional governments, or multinational organizations—such as those imposed by the United Nations, European Union, or the United States—typically in pursuit of foreign policy or security objectives.<sup>1</sup>

### 6.2.3 Privacy and Data Protection

a) Suppliers must comply with all applicable privacy, data protection, and cybersecurity laws, and take appropriate measures to protect personal and confidential information handled on behalf of EDP.

### 6.2.4 Management commitments

a) Adopt management procedures that permit compliance with this Code to be monitored. There is an obligation to report any serious breaches to EDP and to provide evidence of compliance when requested by EDP.

b) Ensure that employees involved in business activities with EDP, including management, follow this Code of Conduct and are informed, trained, and capable of performing their duties according to its terms, regardless of the nature of the legal relationship.

## 6.3 Human rights

a) Ensure compliance with international standards, directives and treaties and conventions on human and labor rights<sup>2</sup>, as well as implement processes and measures to ensure the protection of workers' rights in the value chain.

b) Promote adequate social management practices and transparently report on them. Support these systems in recognized international standards.

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<sup>1</sup> The following lists are considered: (1) List of any economic, financial or business restrictive measure, as well as any trade and arms embargoes imposed by the EU in accordance with Chapter 2 of Title V of the Treaty on European Union and Article 215 of the Treaty on the Functioning of the Union European Union, as available on the official EU website, including any changes or additions that may exist on this or any official website; (2) List of any restrictive, economic, financial or trade measures, as well as any trade and arms embargoes issued by the United Nations Security Council in accordance with Article 41 of Policy EDP Group Integrity Policy 17/03/2025; (3) List of individuals and entities owned or controlled by, or acting on behalf of or on behalf of targeted countries, identifying individuals, groups and entities, such as terrorists or narcotics traffickers – List of Specially Designated Nationals and Blocked Persons (SDN) managed by the Office of Foreign Assets Control (OFAC), part of the US Department of the Treasury, including any changes or additions there may be; (4) List of any economic, financial and trade restrictive measures and arms embargoes issued by the UK Government (including but not limited to those made available on the official UK website), including any changes or additions that may exist.

<sup>2</sup> Human and Labor Rights International Standards, Directives, Treaties and Conventions refers to: the International Bill of Human Rights (Declaration and Covenants); the United Nations Guiding Principles on Business and Human Rights; the UN Ten Principles of the UN Global Compact; the International Labor Organization (ILO) Conventions; or the OECD Due Diligence Guidance for Responsible Business Conduct.

c) Promote consultation, respect, and protection of human rights, the dignity of individuals, and the privacy of each person within the communities impacted by business activities in their respective areas of influence.

d) Ensure that all business activities are conducted without recourse to violence or abuse and reject and refuse any complicity with human rights violations.

#### 6.3.1 Forced labor and modern slavery

a) Ensure compliance with international standards, directives and treaties and conventions on human and labor rights previously defined, including those regarding forced labor prevention<sup>3</sup>, as well as implement processes and measures to ensure the protection of workers' rights in the value chain.

b) Ensure and promote the respect for free labor, based on fair and transparent contracts for workers, refusing to use and be complicit with forced labor, unjustified restrictions on free movement, misappropriation of documents and remuneration and human trafficking.

c) Refrain from retaining workers' identity, immigration, or work permit documents beyond the time required for necessary administrative processing.

d) Establish disciplinary measures and procedures in accordance with the laws and international conventions, publicizing the standards and ensuring the hearing and defense by those accused of disciplinary breaches, and preventing in all cases any intimidation, verbal or physical abuse or aggression, or any other type of moral or physical harassment.

#### 6.3.2 Child labor

a) Prevent any form of child labor and commit with the international standards, directives and treaties and conventions on human and labor rights and, specifically, with those that refer to child labor such as ILO 138.

#### 6.3.3 Indigenous population

a) Suppliers and partners shall respect the rights of indigenous and tribal people and their social, cultural, environmental, and economic interests, including their connection with lands and other natural resources.

b) Suppliers and partners shall identify and appropriately engage with indigenous people where they are present and potentially impacted by the companies' activities, in alignment with OECD guidelines.

### 6.4. Labor rights

#### 6.4.1 Freedom of association and collective bargaining

a) Respect freedom of association and the collective bargaining of their workers, establishing mechanisms of dialogue free from any reprisals or discrimination.

b) Allow workers to associate freely, bargain collectively, and seek representation in accordance with local laws.

#### 6.4.2 Hiring practices

a) Ensure compliance with current labor legislation and collective labor agreements, when applicable, regarding the maximum normal and supplementary working hours, as well as the rest periods and rest days.

#### 6.4.3 Wages and benefits

a) Ensure that workers receive fair and timely remuneration, in accordance with applicable laws and collective labor agreements. This includes payment of at least the legal minimum wage, overtime, other due compensation, as well as social security contributions and taxes.

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<sup>3</sup> Such as Articles 4 and 13 of ILO Declaration on Fundamental Principles and Rights at Work.

#### 6.4.4 Equality and non-discrimination

a) Respect diversity, promoting equality and non-discrimination based on race, age, gender and sexual or marital orientation, ethnic or national origin, name, disability, pregnancy, religion, politics, cultural or trade union orientation. Respecting also any other conditions that may be defined by contract or protected by applicable law.

#### 6.5. Occupational Health and safety

a) Adhere to applicable national legislation, international workplace health and safety standards, the company-wide policy and required certifications. Apply the precautionary principle across all activities, fostering responsibility and awareness among all participants.

b) Identify, monitor and record all risks associated with their activity and specific work tasks, establishing prevention, reduction and continuous improvement measures.

c) Train workers and provide adequate control measures and personal protective equipment to ensure safe and healthy working conditions.

d) Define incident management and emergency preparation measures appropriate to the type of activity, location and circumstances.

e) Ensure that access to potable water is guaranteed in all operations working for EDP, in alignment with OECD guidelines on this subject.

f) Avoid or minimize the risks and impacts to community health, safety, and security that may arise from its own related activities, with particular attention to vulnerable groups.

#### 6.6. Environment

##### 6.6.1 Environmental regulation and permits

a) Comply with applicable legislation and international standards for environmental protection and obtain the environmental certifications required for their business activities.

b) Obtain and maintain all required permits and licenses and comply with the operational and reporting requirements of such permits and licenses.

c) Disclose to EDP any identified environmental risks or impacts and prioritize the development of certified management systems that cover the activities conducted for EDP.

##### 6.6.2 Environmental protection

Identify, monitor and mitigate the environmental impacts and risks of their activities, products, materials and means of transport, promoting continuous improvement and conserving the environment.

##### (i) Natural resources

a) Promote the continuous streamlining of the consumption of energy and natural resources and the reduction of emissions and waste generated by business activity.

b) Comply with the EDP Group's environmental requirements when acting on EDP Group facilities or acting on behalf of the EDP Group.

c) Avoid or minimize any waste or emissions as a result of their business activities. The use of resources such as energy, water, land, and raw materials, should be used in an efficient and sustainable manner.

d) Manage hazardous substances responsibly to avoid pollution and, where possible, promote the substitution for less hazardous ones.



*(ii) Biodiversity*

a) Strive to avoid and minimize impacts on biodiversity. Where impacts cannot be fully avoided or mitigated, potential for compensation and restoration measures should be considered.

b) Avoid, whenever possible, operational activities near highly sensitive biodiversity areas.

**6.6.3 Climate impact***(i) Climate mitigation*

a) Account and either publicly disclose, and / or provide a third-party verification of their GHG emissions.

b) Address greenhouse gas emissions reductions through actions and / or targets preferably in line with the Paris Agreement's 1.5-degree scenario, that, when applicable, can contribute to EDP's CO2 emission reduction targets.

*(ii) Climate adaptation*

Address their climate change risks and act accordingly by developing climate adaptation plans and improving the resilience of its operations.

**6.7 . Local communities**

a) Respect the rights, interests, and development aspirations of affected communities and vulnerable groups during significant changes of supplier normal operations.

b) Foster social and economic development and to contribute to the sustainability of the communities in which it operates.

c) Commit to identify negative potential risks on the communities in which it operates putting in place the necessary measures to ensure impact mitigation. Also commit to maximize the added value in the local community, establishing a fluent dialogue with the community, seeking synergies and creating opportunities, whenever possible, in society.

d) Engage in transparent, open, and honest dialogue and collaborate with stakeholders and authorities in and around the area in which it operates.

**6.8. Reporting mechanism**

a) Report any alleged violations of this Code, or any other applicable regulations, as well as any potential breaches of the law through the EDP's Speak Up channels, ensuring access to justice for parties affected by adverse impacts.

b) Conduct any whistleblowing through the EDP's Speak Up channels to ensure proper handling and confidentiality of the report.

**6.9. Consequences in case of violation**

Address any violations of the Code or equivalent standards that come to its knowledge and take appropriate actions. EDP Group companies will seek appropriate remedial measures to prevent, stop, or minimize the extent of the violation. A major and persistent failure to comply with this Code, or repeated and unjustified refusal to provide the required information can result in the suspension or termination of the suppliers' activities with EDP.