



EDP Local Stakeholder Engagement Policy

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1. VERSION HISTORY

Version	Approval date	Prepared by	Approval	Note
1	26/06/2023	EA&S Corporate Global Unit	Executive Board of Directors	Initial issue
2	23/06/2025	Regulation, Markets and Stakeholders Management	Executive Board of Directors	Update due to organizational changes

2. PURPOSE

As part of EDP's stakeholder engagement methodology, this Policy aims to promote a culture of transparency, strengthen relationships with local stakeholders, encourage their active and effective participation, and minimize negative impacts on local communities, ensuring appropriate interaction between EDP and these entities.

The importance of local stakeholder engagement assumes that stakeholders are considered in the decision-making process of projects promoted by EDP, in accordance with the existing segmentation (Annex I) and the published EDP Group Stakeholder Relationship Policy.

The strategic guidelines set forth in this Policy will enable interaction, engagement, and collaboration with local stakeholders, ensuring that EDP's internal channels enhance communication and the collection of all necessary information to support the continuous improvement of local engagement practices. A set of Procedures complements, by operation phase, all steps required to ensure a Social License to Operate.

Periodic monitoring will be conducted to ensure risk prevention and foster greater learning, within a global perspective of respect for Community Rights.

3. SCOPE

This Policy applies to EDP, S.A. and all its subsidiaries headquartered in Portugal, as well as the EDP Foundation. For controlled companies, whether based in Portugal or abroad, EDP-appointed board members should promote the adoption of this Policy. The same applies to Fundación EDP and Instituto EDP.

4. REFERENCES

4.1. Internal references

- a. Code of Ethics
- b. Integrity Policy
- c. Stakeholder Relationship Policy and Segmentation Model
- d. Stakeholder Management Methodology Guide (includes Local Stakeholder Engagement Plan)
- e. Human and Labor Rights Policy
- f. Environmental Policy
- g. Politically Exposed Persons Procedure
- h. Social Investment Policy
- i. Sustainable Development Principles
- j. Interest Representation Policy
- k. Supplier Code of Conduct
- l. Stakeholders Management – Reputation Survey Action Plan

4.2. External references

- a. OECD Guidelines for Multinational Enterprises (2011)
- b. AA1000 Stakeholder Engagement Standard (2015)
- c. GRI 102: General Disclosures (2016)
- d. EU Corporate Sustainability Reporting Directive
- e. European Sustainability Reporting Standards (EFRAG)

- f. EU Non-Financial Reporting Directive
- g. EU Corporate Sustainability Due Diligence Directive (proposal)

5. TERMS AND DEFINITIONS

EBD – Executive Board of Directors

ESG – Environment, Social and Governance

IR&ESG – Investor Relations & ESG

Stakeholders – All parties potentially affected by EDP's actions, decisions, or projects

BEF – Business Enablement Function

6. DESCRIPTION AND RESPONSIBILITIES

6.1. Principles of Stakeholder Engagement

As part of its operations, EDP acts in full compliance with all its policies regarding ethics, transparency, and human rights, as well as with the internal regulations outlined in section 4.1 and the external references listed in section 4.2 above.

Whenever a specific project is under review, an Environmental Due Diligence and a Human Rights Assessment must be conducted by a qualified and independent third party. The findings must be documented in a formal report.

If no negative impacts are identified for a given project, this must be duly justified in the report.

The report must be shared with the Stakeholder Focal Point Management of that Region or Platform and shall be subject to reassessment if events occur that warrant such a review.

In the analysis of a given project, and based on the results of the Due Diligence and Human Rights Assessment, the relevant departments must identify the following indicators concerning local stakeholders:

- **CapEx:** when the amount has an impact on the activity plan, or the budget allocated to the project.
- **Social:** impact (i) on the local community's economy, lifestyle, and culture; (ii) avoidable impact on vulnerable stakeholders (indigenous populations and minorities; socially disadvantaged individuals; situations involving violations of UN-defined Human Rights); (iii) significant impact on the territory/landscape; (iv) irreversible transformation of biodiversity; and/or (v) significant impact on the local economic activity.
- **Reputational:** (i) affects relationships with public and local authorities; (ii) generates national or local media exposure and/or poses a risk of non-compliance with the Code of Ethics, the Integrity Policy, or other internal regulations of the EDP Group.

- Any other impact that the area considers relevant for the purpose of analyzing local stakeholders.

Projects that, although meeting the criteria, consist solely of commercial contracts with stakeholders are excluded. EDP complies not only with national legislative and regulatory provisions but also with local practices in the countries where it operates.

The relationship with stakeholders must be based on the following principles:

- **Understand / Read the context:** Given that EDP's projects are part of a broader physical, economic, and social environment, it is essential to listen to local stakeholders in order to gain a deep understanding of their culture and to recognize the added value of working in partnership, thereby building a shared foundation of understanding.
- **Communicate / Acknowledge the voice of stakeholders:** Recognize stakeholders' right to participate in the project and the impact they may have on it, particularly through the creation of a public and easily accessible communication channel. This should respect the culture of all communities involved and encourage active participation in decisions that may affect them.
- **Trust / Understand stakeholder characteristics:** Be capable of identifying and understanding the specific characteristics and needs of each stakeholder.
- **Collaborate / Build strong relationships with Stakeholders:** During the development and implementation of projects, in direct interactions with local stakeholders and other involved parties, EDP promotes strict compliance with its Code of Ethics and Integrity Policy, ensuring that all actions are conducted with transparency, accountability, and in accordance with the highest standards of ethics and sustainability.

Step-by-step of Stakeholder Engagement in new territories:



6.2. Local Stakeholder engagement governance model

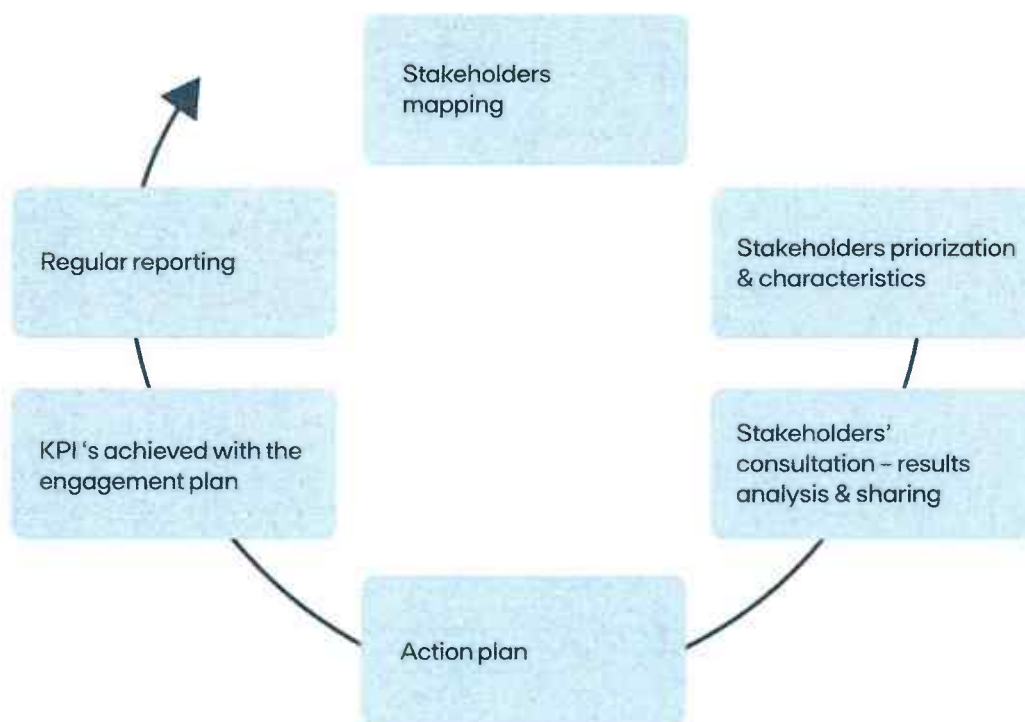
The governance model for stakeholder management, as defined in the EDP Stakeholder Management Methodology Guide, is as follows:

EXECUTIVE BOARD	EXECUTIVE CORPORATE BODY RESPONSIBLE FOR THE MANAGEMENT OF THE EDP GROUP
Regulation, Markets and Stakeholders Management	BEF responsible for ensuring that stakeholder relationships are properly managed, in an integrated manner and in alignment with EDP's strategy <i>Center of Excellence</i> integrated in the <i>Regulation, Markets and Stakeholders Management</i>
Policy, Stakeholders & EU Affairs	responsible for coordinating with business areas to ensure the monitoring and reporting of stakeholder engagement across all of EDP's areas of activity
Stakeholder Focal Points of EDP Regions and Platforms	Stakeholder Managers assigned at the various EDP areas of intervention. They operate in coordination with the Regulation, Markets and Stakeholders Management BEF to enhance the



effectiveness of the stakeholder engagement strategy.

The Stakeholder Management Focal Points of each EDP Region must receive the following information from Project Managers:



EDP must establish mechanisms to monitor and evaluate the effectiveness of local stakeholder engagement, as well as to implement continuous improvements and adjustments to the adopted approach. Additionally, a local dialogue procedure must be established to ensure that all complaints related to each project are handled consistently, with safeguards in place to protect against any form of retaliation.

7. FINAL PROVISIONS

This Policy shall take effect from the date of its approval by EDP's Executive Board of Directors.

The Regulation, Markets and Stakeholders Management BEFs responsible for reviewing and updating this Policy, with revision proposals to be submitted whenever deemed appropriate.

ANNEX I – Segmentation of EDP Group Stakeholders

