

Code of Ethics

Our Energy



Our Energy

1 Personnel in charge

Preparation

Ethics & Compliance Global Unit;

Approval

EDPR Board of Directors, 2024.

2 Review and update

The approved Code of Ethics, including annexes A and B, replaces the Code of Ethics from 2022.

The Code of Ethics is reviewed every two years, notwithstanding the fact that, if warranted, it may be subject to additional reviews.

3 Dissemination

The Code of Ethics is released on the various EDPR companies' institutional websites and made available online through their respective internal networks.

The Code of Ethics is published in Portuguese, English and Spanish. Should there be any discrepancy in interpretation between this text in English and its translation into another language, the original spirit of the text written in English should prevail.

Index

Messages

Message from the Board of Directors

Our identity ... and main ethical commitments

Leading with Responsibility

A Code for everyone ... which guides and holds us accountable

We give everyone a voice

Let's make the way for OUR ENERGY

1 A Company focused on People

- 1.1 Employee Well-being
- 1.2 Health and Safety
- 1.3 Company Representation
- 1.4 Diversity, Equity and Inclusion
- 1.5 Harassment
- 1.6 Human and Labour Rights

2 Relationships of Trust

- 2.1 Relationship with Shareholders
- 2.2 Relationship with Customers
- 2.3 Relationship with Suppliers
- 2.4 Relationship with Communities
- 2.5 Competition

3 A sector undergoing Transformation

- 3.1 Environment
- 3.2 Energy transition
- 3.3 Digital revolution
- 3.4 Entrepreneurship and Cooperation

4 Action with Integrity

- 4.1 Corruption and Bribery
- 4.2 Conflict of Interest
- 4.3 Gifts and Entertainment
- 4.4 Money laundering and countering the financing of Terrorism
- 4.5 Privacy and Personal Data Protection
- 4.6 Use of Company Information
- 4.7 Use of Assets

Find out...

- A. Organisational and governance instruments of Ethics within the EDPR group
- B. Glossary

Message from the Board of Directors



Our ethical values have never been more important and our commitment to the highest standards of behaviour has never been more critical. The Code of Ethics is therefore an especially important guide to assist us.



Chairman (independent)
António Gomes Mota



Vice-Chairman & CEO
Miguel Stilwell de Andrade



CFO
Rui Lopes Teixeira



Director
Vera Pinto Pereira



Director
Ana Paula Marques



Director
Miguel Ferreira Setas



Director
Manuel Menéndez Menéndez



Director
Acácio Mota Piloto



Director
Allan J. Katz



Director
Rosa María García



Director
José Manuel Morgado

Message from the Board of Directors

Recent years have been marked by changes of great impact that pose serious challenges to society and businesses of all kinds (worsening climate risk, digital revolution, global pandemic and, more recently, the war in Eastern Europe, among others).

The response to these challenges has required, and now more decisively imposes, that organizations strengthen their values and their ethical culture in order to ensure their sustained development, respecting everyone with whom they interact, either in-house or externally.

EDPR has a long history of ethical business practices that have allowed the creation of a strong ethical culture that is currently one of its key assets and decisive for the success of its business.

The ethical values of the Company, which have always been at the core of its development, have allowed it to establish the highest standards of action, where practices of integrity, respect, transparency, fairness and solidarity have contributed to the confidence of all stakeholders, in a long journey of solid ethical reputation.

Our Code of Ethics, which is now being updated, tells us, in a simple and practical way, about all of this: it reminds us of our values and ethical commitments; it signals the energy transition leadership strategy that EDPR pursues; it identifies the specific risks and ethical challenges that our employees may face in doing business with EDPR; and it includes examples of concrete situations and how they can be resolved. It also clarifies to whom, when in doubt, employees can turn to.

The Code also reiterates that should we suspect breaches to the principles or guidelines therein, we must report them, with the absolute certainty that there will be no reprisal for those who do so.

By respecting the Code of Ethics – which applies to everyone in the Company, regardless of their role or rank in the organization – we can achieve common and concerted action in all parts of the world where EDPR operates, whilst continuing to enable our success both as a company and as individual employees.

By doing what we have to do well. Deciding, each and every day, on the right things.

Our ethical values have never been more important and our commitment to the highest standards of behaviour has never been more critical. The Code of Ethics is therefore an especially important guide to assist us.

We invite you to refer to and become familiar with the revised EDPR Code and to take it as a benchmark for everyday work.

Our identity...

EDPR is a leading company in the global energy sector, focused on creating superior value for all its stakeholders.

The Company's purpose, *"Our energy and heart drive a better tomorrow"*, aims to ensure the alignment of all its employees on what moves us to responsible leadership.

In this regard, **energy** represents the Company's strength, its history, its stimulus to continually deliver its goals; the **heart** reflects the key role of the Company's employees in fulfilling their commitments to customers, partners and communities; **drive** reflects EDPR's ambition and leadership to make things happen; and a **better tomorrow** is actually the reason why the Company, all of us, work every day.

Through the **strategy "Changing Tomorrow Now"**, with which EDPR aims to achieve ambitious goals of sustainable growth, the company expresses the commitment to excellence in the development of its business, decisively contributing to fair energy transition and to the construction of a better world for all, in particular, through the option to make significant investments in clean energy in the coming years.



Reputation is one of EDPR's key assets. The Company is therefore committed to conducting all its activities in a responsible and ethical manner in the different markets in which it operates, acting in accordance with the principles that derive from and are the basis of its identity.

...and main ethical commitments

A bold vision of the future we aspire to – of growth, of employee involvement, of loyalty to our customers and partners – is undoubtedly based on sustaining the company on **key values**, on a unifying purpose and also on the existence of a strong **Code of Ethics**, a fundamental pillar of **OUR ENERGY!**

EDP's main **identity traits** and its affirmation of ethical commitment, thus materialize in a company...

1

... which is **people-centred**, the “heart” of its strategy, ensuring their complete well-being, namely by promoting a culture of respect and acceptance among all and at all stages of their life within the organisation; of freedom to intervene without fear of retaliation; of constant attention to physical and mental health; of encouraging the development of knowledge and the achievement of new skills; of ensuring the most appropriate practices of flexibility at work and the possibility of a good balance between working time and leisure time.

2

... that promotes and practices **relationships of trust** with its stakeholders, acting to continuously improve economic and social results, sharing value with employees, shareholders, customers, suppliers, communities, respecting competition and combining social and environmental responsibility concerns. Always with the awareness that a stronger and serious cooperation allows us all to achieve better effects.

3

... that consistently works – and with a strong sense of urgency and anticipation – to lead the profound **transformation of the energy sector** that is underway, committing to audacious decarbonisation goals and the achievement of a fair and innovative energy transition, supported by the always responsible use of technology.

4

... which maintains a strong commitment to **compliance with internal and external policies and standards**, ensuring compliance with applicable laws and regulations in all jurisdictions in which it is present and maintaining robust internal monitoring systems for the prevention and monitoring of possible infringements.

Leading with Responsibility

Ethics is one of the fundamental pillars of human activity and, consequently, of business activity. At companies, all of us are assigned the role of making Ethics come alive in our daily actions, but leaders, at any level, have a special mission – being the ones who manage teams, who feed them with competence, guidance and inspiration – which translates into a strong responsibility for the promotion and dissemination of the ethical culture.

This means that leaders are responsible for disseminating EDPR's values and its Purpose in day-to-day decisions and through their essential knowledge of the Company's corporate ethics policy, as well as the standards of behaviour that enable everyone to "do the right thing" and, by their example, give the appropriate signals in building the desired organisational culture.

The context of profound social and cultural changes that society is facing entails new challenges for leadership, which we recognise at EDPR and on which we seek to ensure the best management: understanding the expectations of younger generations with regard to social and environmental responsibility; being able to create a healthy environment in which people feel comfortable sharing experiences and reporting less ethical behaviour that they observe; being able to listen to and understand reported concerns, providing psychological security; knowing how to value the richness resulting from the diversity of teams; ensuring, on the whole, the physical and mental wellbeing that allows people to evolve in a positive way and make their valuable contribution to the organisation, helping to strengthen the ethical culture.

Also, the challenges posed by the technology revolution – new systems, their potential and their risks, as well as the demand for new digital skills – and by significant changes in the world of work – hybrid work, new forms of contractual relationships, among others – place unprecedented performance demands on leaders.

In view of the more demanding expectations placed on companies to develop ethical and responsible businesses and for management to be effective, it is essential that leaders are open to the world and to the multiple ongoing transformations, humane, able to listen and advise, honest, fair, transparent, builders and promoters of a culture, intolerant of ethical violations.

At EDPR, awareness of this demanding behavioural standard is clear, and we seek to support people in their preparation so that they can exercise their leadership roles exceptionally well.



A Code for everyone...

The EDPR Code of Ethics applies to all employees of the EDPR companies, hereinafter referred to as “EDPR”.

We must all read, understand and uphold the Code of Ethics.

The employees’ commitments set out in the Code of Ethics are, mutatis mutandis, also applicable to proxies, as well as to agents and suppliers who are in any way empowered to act on behalf of EDPR.

Other suppliers are explicitly required to abide by this Code, in accordance with the obligations arising from qualification procedures or established contracts.

Entities in which EDPR holds more than 50% of the voting rights, or is entitled to hold voting rights, must comply with the EDPR Code of Ethics, while non-controlled companies are encouraged to do so.

EDPR has a relevant presence in the world energy scene, operating in several countries and employing over 2,000 employees. The English version of this Code is the benchmark document and is available in other working languages in force. We respect and comply with all legal and regulatory regulations in the jurisdictions that apply to EDPR, with reference to the principle of the utmost demand.



...which guides and holds us accountable

The Code of Ethics is an “action guide” reflecting the way EDPR believes one should work, therefore its enforcement is inevitably mandatory. Thus, employees who fail to comply with the provisions of this Code are subject to disciplinary action under the legal and regulatory terms applicable to the infractions committed. Suppliers to whom the Code is applicable will also be subject, in case of non-compliance, to the measures or sanctions contractually established or arising from the evaluation and qualification procedures in force at EDPR.



The Code is also not a substitute for the Policies, Procedures and other internal documentation existing in each specific area of EDPR’s activity, but rather consists, in general, of a good rationale to support these.

On the other hand, the Code does not cover all the situations that may arise for decision making that could be considered of an ethical nature. It does not provide us with all the answers, nor is it

supposed to, and cannot replace the careful judgement and common sense of all those who work at the Company. The Code is a guide that, by indicating privileged ways of choosing and acting, aims to help us understand sensitive or less common situations and to reject unacceptable practices, regardless of the context and other people’s perceptions.

Faced with a difficult decision situation related to our way of acting within the context of the Company, the following steps should be followed:

Stop to think

whether the situation at hand does indeed constitute an infringement of the Code and how it can be addressed.

Cautiously reflect

on whether the approach that has been identified is consistent with maintaining the culture of integrity, transparency and trust that EDPR promotes and what kind of consequences it may bring about.

Ask questions and ask for help

from the management or other responsible persons or, if necessary, from the Ethics & Compliance Area. In this Code, in “We give everyone a voice” for each topic of Ethics, the channels to which we can resort to are mentioned.

We give everyone a voice

At EDPR we believe that speaking openly about the concerns we have that relate to the way we act in the workplace is crucial for creating a good environment and for the commitment and empowerment of each one of us, which is essential to the performance of excellence that EDPR pursues. This openness in addressing concerns or even complaints must be adopted with all stakeholders, for the sake of transparent, upright and constructive relationships and which is essential to achieve the performance of excellence that EDPR aims to.



A **frank conversation** between the parties decisively contributes to increasing the psychological security of both individuals and teams and that its effect on results is, for employees, differentiating. However, if such a conversation is not enough, and we are faced with an experience or observation of behaviour that we believe to be in conflict with the Code of Ethics, we must report it. The **report** must be comprehensive, and based in good faith, for a report made in bad faith or of a slanderous nature will not be accepted and may even constitute a disciplinary offence, under the terms and for the purposes of the applicable laws and regulations.

It is desirable that the concern, request for information or claim, where employees are concerned, can be resolved through their management. Leaders have a special responsibility in listening to these concerns and acting on them, and this is a path that should be followed as it strengthens trust among everyone. However, and where this is not possible, employees – and other stakeholders likewise – may refer directly to the **Ethics & Compliance Officer**, or report their concern or claim at the [Speak up channel](#).

Through these channels, reporting will follow a **robust, effective and efficient management process**, supported by an independent governance model – which includes EDPR’s Ethics Commission, the Ethics & Compliance Officer and, in matters relating to integrity issues or certain specific legislation, the Compliance area – where the confidentiality of whistleblowers is fully ensured. All contacts may also be made anonymously. EDPR’s Commission and Ethics & Compliance Officer intervene in EDPR’s whistleblowing management process. This process can be consulted in detail in the [Whistleblower Management Regulation](#).

An essential aspect of the process for reporting potential breaches of the Code of Ethics is the “**non-retaliation**” obligation. In fact, EDPR prohibits any form of reprisal – overt or subtle – against anyone making a report and considers that retaliation is itself a breach of the Code of Ethics and may be subject to disciplinary action. Retaliation against an employee who signals a potentially ethical situation damages the Company’s trust and reliability; on the other hand, this act may also expose the Company to serious legal risk.

At EDPR we believe that the freedom to report unethical conduct, based on the essential principle of good faith, is an essential component of an open organisational culture, where employees feel supported in doing the right thing.

Let's make the way for OUR ENERGY!

The Code of Ethics is inspired by **EDP's Purpose** and is built on its identity.

We describe this identity under four “traits” that describe the way in which we do things at the Company; each of these “traits” contains the themes that are very relevant to EDPR, and we talk about the reason for their choice and the behaviour that we must follow, or not in order to ensure consistency of action throughout the organisation.

We illustrate some of these behaviours with situations from our daily life at the Company, because in the end, Ethics is nothing but action. The behaviours and examples indicated are obviously not exhaustive but represent the essence of the way we want to operate and be recognised by all stakeholders.





A Company focused on People

- 1.1 Employee Well-being
- 1.2 Health and Safety
- 1.3 Company Representation
- 1.4 Diversity, Equity and Inclusion
- 1.5 Harassment
- 1.6 Human and Labour Rights

1.1 Employee Well-being

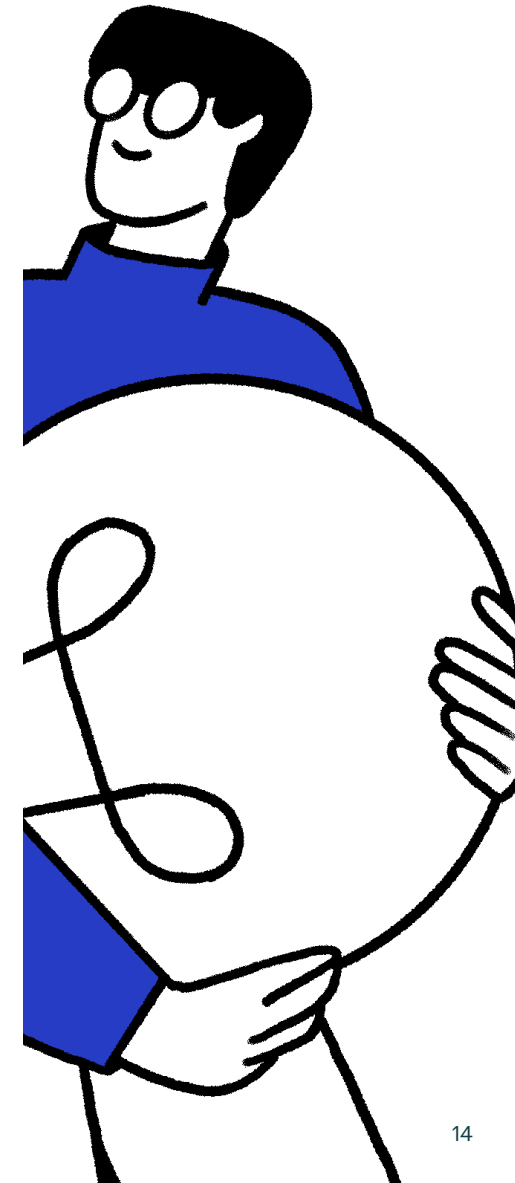
Commitment to employees' well-being is fundamental to EDP, which embodies it through management policies that aim to **provide high levels of satisfaction and professional fulfilment**, namely by ensuring fair wages and a safe and healthy work environment at every stage of their journey.

Employees are "at the heart" of the Company's strategy and their well-being is seen as a priority, which is pursued through concrete objectives expressed in the "Global Well-being Strategy" and outlined in the following dimensions: physical, emotional, social, professional and financial.

Therefore, in addition to strict compliance with labour legislation applicable in the jurisdictions in which EDPR operates and firm protection of employees' privacy, the Company seeks to maintain an **excellent social climate** through the implementation of policies and practices such

as the continuous development of skills, the promotion of mobility, the inclusion of flexibility in working arrangements, namely by valuing hybrid working models, encouraging a balance between professional and personal life, promoting volunteer work, encouraging sports and leisure activities, and creating and maintaining suitable workspaces.

Since well-being is an indispensable condition for harmonious operation, EDP ensures policies and practices that involve everyone, with no exceptions, so that **each person feels part of the company as a whole**. It is also important to remember that it is up to all of us, and in particular each of us, to **find ways to live our values at work and to build good relationships and good atmosphere in the work context**, with leaders having a special role in creating an environment in which people can thrive.



We must

01. Recognise and experience EDP's Purpose, by becoming aware of the importance of the individual contribution to the whole and building together an environment of trust, responsibility and mutual respect.

02. Actively seek professional development that contributes to the continuous updating of core competencies, making the best use of the opportunities provided by EDPR.

03. Promote a workplace where everyone is available to speak openly when they believe something is not right, without fear of any form of retaliation, contributing to a transparent and trustworthy organisation.



04. Invest in work-life balance, acknowledging the importance of individual wellbeing for a healthy, balanced work experience, taking advantage of the new flexible working models and other conciliation opportunities that EDPR offers.

05. Value volunteering as a form of active civic participation.

06. Allow, under the strict terms of the law and applicable internal policies and procedures, the provision of mechanisms for employee participation in political processes, which may include monetary contributions on a voluntary and personal basis.

We must not

01. Tolerate behaviour, even if subtle, that contributes to harming well being in the workplace.

02. Allow actions that do not respect the rights and diversity of each person, and that constitute prejudice or unjustified discrimination.

03. As leaders, prevent, in an unfounded manner, mobility processes, participation in training and volunteering activities at EDPR.

04. Violate employee privacy.

05. Neglect proper care and communication with each of the team members, as well as equity in the distribution of work, especially in the hybrid or remote working models.

06. Ignore tell-tale signs of employee distress, stress or burnout.



Examples

Question



My team leader is sometimes quite intimidating. I know they strive to ensure that we permanently deliver quality work, but sometimes the pressure is too much. Is there anything I can do about this?

Answer

Your manager is expected to challenge and lead the team to deliver the excellence in performance that characterises EDPR. This may mean that there are moments of tension. However, a manager is also expected to treat everyone with respect and act with sensitivity. If you feel you are not being treated with respect, try talking to your line manager. Should the situation remain unresolved, you can contact human resources or, as a last resort, use the Speak up channel. A healthy working environment can only occur with everyone's support and involvement.

Question



A voluntary action was published which I would very much like to participate in; however, as we are close to the end of the year and with high work intensity, my participation in this action may not be well regarded by my management and colleagues. What should I do?

Answer

Professional obligations must always be taken care of. On the other hand, EDPR is known to actively support its employees in the practice of social volunteering. Thus, you should talk to your line manager and, together, try to find the best decision, which should never allow you to neglect your professional responsibilities.

Question



I am working on a project with collaborators from different geographies and lately the project manager has systematically neglected to schedule the meetings at times that are compatible for all the teams, which has caused some discomfort. It is my understanding that the teams have sacrificed their schedules and personal lives in order not to miss the meetings. I know that the project is very important for EDPR, but I don't think it is a fair attitude. What should I do?

Answer

Whoever is appointed to manage a project is expected to deliver the respective tasks on time and with quality; however, the well-being of all those who are part of the project teams cannot be neglected, which is also the manager's responsibility. Therefore, you should talk to your line manager to make them aware of the situation. If the situation is not resolved, you can resort to the Speak up channel.

Question



Because I am looking after my parents, I decided to choose, after the pandemic, the hybrid working model, with more time online than face-to-face, unlike most of the colleagues in my team. I am, however, concerned about my future opportunities for professional development. Who should I contact for advice?

Answer

EDPR supports work flexibility, both spatial and temporal, and is an FRC - Family Responsible Company. Your choice of hybrid work should not hinder your professional development. You should raise your questions on this subject with your line manager or with the human resources departments of the respective areas.

Find out...



Related information

[We put well-being first](#)

[Internal Mobility Policy - Local and International](#)

[Training Policy](#)

[Volunteer Policy](#)

[Code of Conduct for Top Management
and Senior Financial Officers](#)

Procedure for Managing Claims

Dedicated area

[Wellness](#)

[Mobility](#)

[Volunteering](#)



We give everyone a voice

Management

People Management Officers

Ethics & Compliance Officer

[Speak up Channel](#)

1.2 Health and Safety

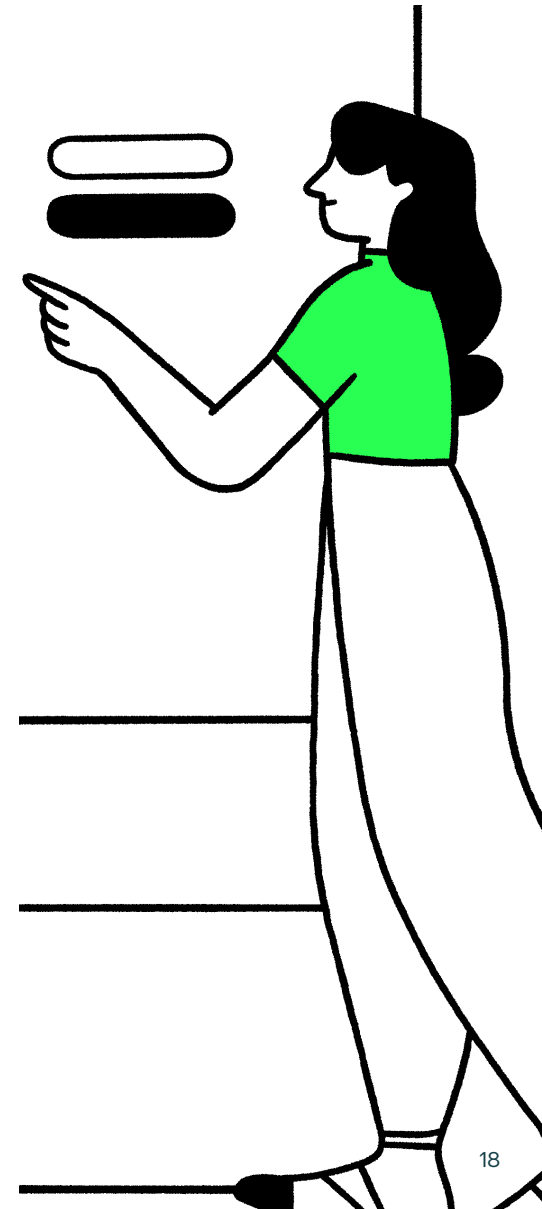
The Health and Safety of everyone, employees and suppliers alike, are fundamental issues for EDPR.

As far as Safety is concerned, the Company aims to **achieve “zero accidents”** and at the same time is constantly concerned with putting people’s well-being before any operational need. No situation or urgency of service can justify endangering the life, physical integrity or safety of anyone.

Based on the reinforcement of a vertical culture of prevention and safety, EDPR promotes the training and information of all employees on the risks inherent to activities and protects the facilities and equipment by adopting the best techniques, combined with the monitoring and updating of work procedures. **The importance that EDPR places on the topic of Safety extends to the supply chain,** in particular to all service providers acting on behalf of EDPR or working on its premises, and goes beyond compliance with legal imperatives, in all the companies and jurisdictions in which it operates.

And, in the wake of the COVID-19 pandemic, EDPR has strengthened its attention to the health of its employees, designing a “Global Wellness Strategy”, the objectives of which are to create or strengthen, through various initiatives, the conditions for each employee to benefit from a **complete state of physical, mental and social well-being**. Healthy life practices are thus encouraged and supported in all contexts, with the Company continuing to provide its employees with supplementary protection and medical assistance.

The excellence required in these two areas can only be achieved with the involvement and accountability of all levels of management and with the support and contribution of all employees, suppliers and other stakeholders.



We must

01. Ensure that everyone, including suppliers, in particular those acting on behalf of the Company, comply with health and safety standards and practices in accordance with current legislation and regulations.

02. Ensure the continuous reinforcement of a safe, healthy and productive work environment, namely through actions of awareness raising, training and sharing of good practices.

03. Monitor and evaluate risks and incidents.



04. Report any non-conformity detected, as well as the observation of incidents, whether accidents or near misses.

05. Take permanent precautions in order to avoid putting ourselves or others at risk, whatever the circumstances.

06. Be aware of the procedures applicable in the event of an emergency.

07. Exercise the right of refusal in case of unsafe conditions for carrying out the activity.

08. Be alert, to ourselves and to others, to signs of physical or mental exhaustion, such as persistent tiredness, difficulty in concentrating, memory failure, insomnia or excessive sleep, anguish, anxiety or irritability, among others.

09. Really disconnect from work when enjoying time off.

We must not

01. Fail to apply the same security principles, policies and procedures in all activities and with all partners.

02. Disregard strict compliance with the Company's health and safety objectives.

03. Neglect the active and continuous promotion of physical and mental health, namely by not taking advantage of Company benefits and initiatives regarding physical, mental and social well-being.



Examples

Question



Answer

On occasion I have noticed that on an EDPR site some of the stipulated procedures were not being followed. The work has nothing to do with me directly. Should I report this?

Safeguarding compliance with applicable procedures (in particular those relating to legal obligations and health and safety at work), as well as the Company's image, concerns everyone, regardless of their area of activity. You should report promptly using the appropriate channels. In the event of imminent serious risk, the work should be stopped immediately by the bystander. All EDPR employees have the duty and autonomy to interrupt any work being carried out by their own teams or by service providers when the appropriate safety conditions for performing it do not exist.

Question



Answer

I have noticed that a colleague has been increasingly apathetic and struggling to concentrate, which has hampered the team's work. I have asked him on several occasions if he is having any personal problems, but he insists that everything is fine. I'm worried; What am I supposed to do?

Indeed, these can be signs, albeit subtle, of depression. Having already insisted with your colleague, you should inform your superior so that he/she is aware of these signs and can act accordingly, namely by resorting to psychosocial support lines.

Find out...



Related information

[Health and Safety Work Policy at EDPR](#)

[Code of Conduct for Suppliers](#)

[Internal area dedicated to Prevention and Security](#)

Procedure for Managing Claims



We give everyone a voice

Management

Responsible for the Prevention and Security Areas of Business Units

Ethics & Compliance Officer

[Speak up Channel](#)

1.3 Company Representation

The performance of each one of us and the way we communicate, as employees, proxies, authorised representatives or service providers with powers to act **on behalf of EDPR**, in formal or informal representation, affects EDPR's image and reputation.

It is therefore essential to be aware of the impact of everything we do and say, in public spaces, whether physical or virtual, especially when the name and the activity of the Company are involved, since we are inevitably EDPR's ambassadors.

New technologies are radically changing the way we communicate, both at corporate and individual level. Social networks, for example, as digital public spaces, can increase the sense of belonging and help create collective knowledge. However, acting

and interacting in online communities, sharing information, ideas, interests, personal messages and other content, makes it difficult to dissociate our personal image from that of the Company. As such, it is up to each of us to **make a clear distinction between personal opinion and a Company position**.

We are also called upon to **represent EDPR with honour and pride, valuing its principles and commitments, especially those relating to Ethics and Sustainability**.



We must

01. As EDPR's formal representative, to act within the established limits, to ensure consistency, coherence and transparency in all internal and external communication channels.

02. Predict the impact of our statements, especially outside EDPR, always bearing in mind the reach that the information may have in the media and social networks.

03. Distinguish between what is personal opinion and the Company's position.



04. Ensure that any communication about EDPR has been adequately prepared and also cleared by management.

05. To inform management of derogatory comments or opinions concerning the Company of which we become aware, namely through contacts received or disclosed in the media or on social networks.

We must not

01. Act beyond the responsibilities attributed to us when carrying out specific duties at the service of or when representing EDPR.

02. Speak in public on behalf of EDPR, unless duly authorised by management.

03. React to negative or derogatory content about EDPR unless we are duly informed and authorised to do so.

04. Share internal information on social media.

05. Use EDPR resources, such as email or personalised cards, to express personal opinions or promote private business.

06. Quote colleagues, customers, partners, service providers or other related parties without their approval.

07. Under no circumstances should you use the EDPR brand for particular purposes.

08. Involve EDPR in our activities on a personal level.



Examples

Question



In a conversation between friends about media issues, subjects that question EDPR's reputation were mentioned. Should I take part in this conversation?

Answer

You should present the Company's position on this matter, if you have the knowledge to do so. If you do not have sufficient information, you should refrain from commenting stating that EDPR acts with integrity. In addition, you should state that EDPR has its own channels for disclosing information as well as for reporting situations that are considered inappropriate.

Question



I came across information with derogatory remarks about EDPR on social networks. What is the best thing to do?

Answer

You should let your manager know immediately.

Question



I am participating in an important international conference in the sector and over dinner we talked about each of our companies. The following day, I realized that one of the people was a journalist. Although I didn't mention anything confidential, nothing I said was supposed to be on the newspapers. Should I do anything now?

Answer

When you are at a public event, always bear in mind that everything you do and say, whether at a professional or personal level, can be published in the media or social networks. Contact your manager who will advise you on what to do.

Question



A friend of mine is running for political office. Can I help her with her campaign?

Answer

Yes, your voluntary support is a personal decision. However, under no circumstances may you use EDPR's resources, including working hours, telephones, emails, materials, the name of the Company or your position in it, to promote the campaign, namely using professional social networks where your name is associated with EDPR.

Find out...



Related information

[Code of Conduct for Top Management and Senior Financial Officers](#)

Procedure for Managing Claims

Dedicated area

[EDPR on social networks](#)



We give everyone a voice

Management

Ethics & Compliance Officer

[Speak up Channel](#)

1.4 Diversity, Equity and Inclusion

EDPR currently has a global presence, integrating diverse people all over the world. we prize and promote this **diversity as a factor that creates value and innovation**, but also as a form of inclusion, which allows, with **fairness**, to open horizons and learn about new realities of overcoming.

We acknowledge that **to add differences is to go further**, to bring together points of view and ways of seeing the world, to integrate all dimensions, to be inclusive in a conscious way, namely through profiles, paths and experiences that add value and allow us to do what we have to do better.

We actively seek not to be led by any bias, be it conscious or unconscious, and take steps to foster an inclusive culture that makes everyone feel welcome.

We promote diversity and inclusion, ensuring equal opportunities as an employer, which we also encourage with our suppliers.



We must

01. Promote mutual respect and equal opportunities in the face of diversity by providing an inclusive working environment free from prejudice and discrimination.

02. Ensure an environment where all people feel respected and safe in being who they are.

03. Encourage the inclusion of all expressions of human diversity.



04. Value and protect the uniqueness of each person, to ensure fair and equal opportunities for all.

05. Ensure that suppliers who act on behalf of EDPR are aware of our commitments in this area.

We must not

01. Determine nor constrain any type of decision based on discriminatory factors, namely, ancestry, age, gender, sexual orientation, gender identity, marital status, family situation, economic situation, education, origin or social condition, genetic heritage, reduced work capacity, disability, chronic illness, nationality, ethnic origin or race, place of origin, language, religion, political or ideological beliefs, trade union membership, or on the basis of job, activity or professional category.

02. Discriminate, neither in the recruitment process or at any other time in the relationship between employees and the Company, such as training, professional development, recognition and mobility within and between companies, among others.



Examples

Question



A colleague with motor disabilities has recently been included in my team. I am naturally sympathetic to his problem, but the truth is that his productivity is lower, and, at the end of the day, this is reflected in the team's results. What can I do?

Answer

You should talk to your manager and explain your concerns. At EDPR there is room for everyone, but if your colleague has been assigned goals or duties that they cannot meet due to their physical condition, it will not be good for either them or the team. Together they will be able to assess the situation and, if necessary, find a more suitable alternative solution.

Question



I am about to start parental leave and I am worried about what will happen when I return, namely about my future career development opportunities. Who should I contact for advice?

Answer

EDPR, namely as an FRC – Family Responsible Company, supports employees at the end of parental leave, ensuring their return to the activity for which they were hired. Any questions or concerns on this subject may be raised with your line manager or with the human resources departments of the respective areas.

Question



When preparing to set up the internal team for a new project, I suggested including two colleagues with many years of experience at EDPR and with much experience of the matters to be dealt with in the project. However, I was told that in view of their age it might not make much sense to include them in the team. I replied that, on the contrary, this would be an excellent opportunity to value their experience and retain knowledge in the company before they retire. Does it make sense for me to insist on this suggestion?

Answer

Your proposal makes perfect sense, and you must insist on it. This is in fact a good inclusion measure that not only values the knowledge that employees have accumulated in the company, now allowing them to apply it to a new project but will also certainly make them feel that they “belong” to EDPR, which is very important to maintain or increase their well-being. Age is just a reference that does not translate the real capacity, either physical or intellectual, of people, who presently have, in general, a much greater healthy and active longevity.

Question



I frequently hear that diversity is important to the Group. Does that mean I should favour the hiring or promotion of people with disabilities or people from ethnic minorities or other groups that are often discriminated against?

Answer

No, that's not what is expected. At EDPR, we hire on the basis of candidates' skills and experience and so you must select or promote according to these criteria, without prejudice or discrimination.

Find out...



Related information

[Diversity, Equity and Inclusion](#)

[Internal area dedicated to Diversity and Inclusion](#)

[Procedure for Managing Claims](#)



We give everyone a voice

Management

People Management Officers/
Persons in charge of People Management

Ethics & Compliance Officer

[Speak up Channel](#)

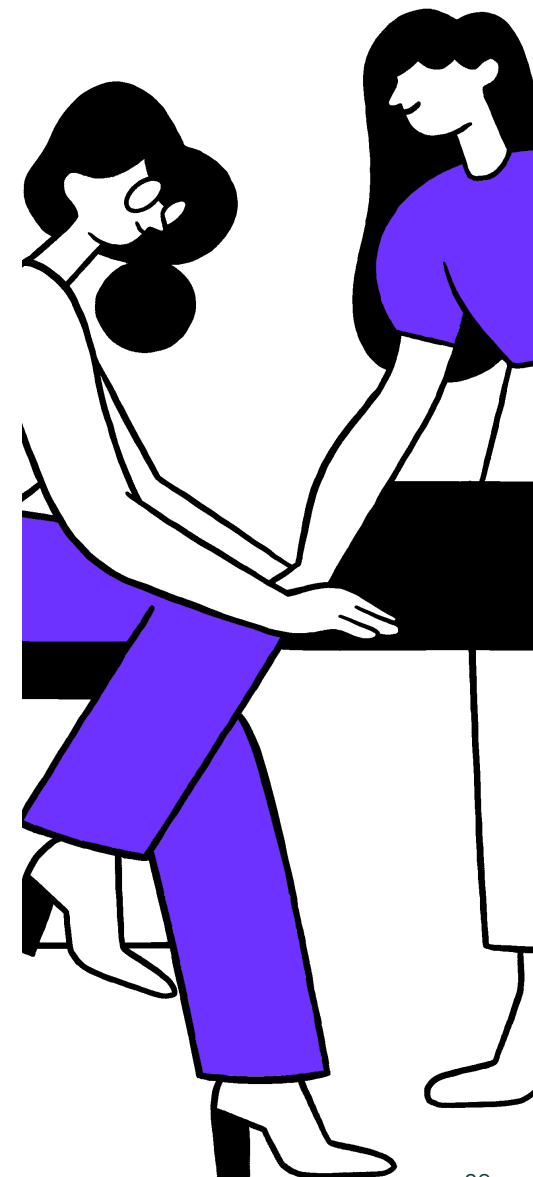
1.5 Harassment

EDPR promotes a **culture free from any sort of harassment**, understanding this to be systematically undesired behaviour of a moral or sexual nature, in a verbal, non-verbal or physical form, which has the goal or effect of disturbing or embarrassing another person, or affecting their dignity or creating an intimidating, hostile, degrading, humiliating or destabilizing environment.

Moral or sexual harassment can occur in any strata of society, context or place of work, affecting the person regardless of their ancestry, age, sex, sexual orientation, gender identity, marital status, family status, economic or cultural situation, education, social origin or condition, genetics, reduced working capacity, disability, chronic illness, nationality, ethnic origin or race, territory of origin, language, religion, political or ideological convictions, trade union membership or, in addition, job, activity or category.

Harassing forms of behaviour in a business context violate the victims' labour rights, and may affect their value as people and workers, causing harm that can have an impact on their self-esteem, physical and mental health, life project and family relationships.

In addition to the legal obligations to which EDPR is subject to, **it is the duty of all workers to prevent, confront and report any and all behaviour that may preclude a situation of harassment**. The duties and/or principles laid down in specific legislation and in internal regulations shall apply to proxy holders, representatives and suppliers.



We must

01. Refrain from engaging in any form of behaviour which may constitute harassment at work.

02. Prevent and combat harassment at work.

03. Report harassment at work of which we are a victim or witness, through existing communication channels.

04. Attend the regular mandatory training sessions on harassment.



We must not

01. Tolerate any behaviour of moral harassment, such as: systematically devaluing the work of colleagues or employees; promoting the social isolation of colleagues or employees; constantly ridiculing, directly or indirectly, a physical or psychological characteristic of colleagues or employees; setting impossible-to-achieve goals and objectives or unfeasible deadlines; assigning duties inappropriate to the professional category of employees; unjustifiably not assigning any duties to employees; misappropriating ideas, proposals, projects or work of colleagues or employees.

02. Condone any form of behaviour involving sexual harassment, such as: repeating suggestive remarks or comments about co-workers' sexual appearance or orientation; systematically making phone calls and sending unwanted messages of a sexual nature; repeatedly sending sexual gifs, drawings, photographs or images; intentionally promoting unnecessary and unsolicited physical contact or approach; conditioning the hiring, professional progression or any other employment benefit, through unwanted activity of a sexual nature.



Examples

Question



A colleague is being systematically commented on by other colleagues about clothing and other physical attributes, which clearly displeases him. Does sexual harassment necessarily involve physical contact or unwanted touch?

Answer

No. Sexual harassment can also be verbal. Words and gestures can be as offensive as acts or physical contact. Inappropriate stories and comments can be considered sexual harassment if they have the purpose or effect of upsetting or embarrassing the person, affecting their dignity or creating an intimidating, hostile, degrading, humiliating or destabilising environment.

Question



I am often the target, by a colleague, of prejudiced and sexist comments, which naturally makes me quite uncomfortable. What can I do?

Answer

First of all, you should talk to your colleague and explain how you feel about the situation. if he persists in this attitude, you can speak to your line manager and make them aware of the situation. if there is still no change, you should report the case through the appropriate channels.

Question



A colleague told me that he had been harassed by another colleague. I advised him to make a report, but I know he didn't. Can I do it myself?

Answer

In advising your co-worker to report this you took the first correct step. if you believe that this is actually a case of moral harassment, you can do it yourself through the appropriate channels.

Find out...



Related information

[Code of Conduct for Top Management and Senior Financial Officers](#)

Procedure for Managing Claims



We give everyone a voice

Management

People Management Officers/
Persons in charge of People Management

Ethics & Compliance Officer

[Speak up Channel](#)

1.6

Human and Labour Rights

EDPR respects and ensures respect for internationally recognised human rights, implementing **management policies and measures that identify, monitor and avoid risks associated with its activity that may affect employees, communities, customers or suppliers.**

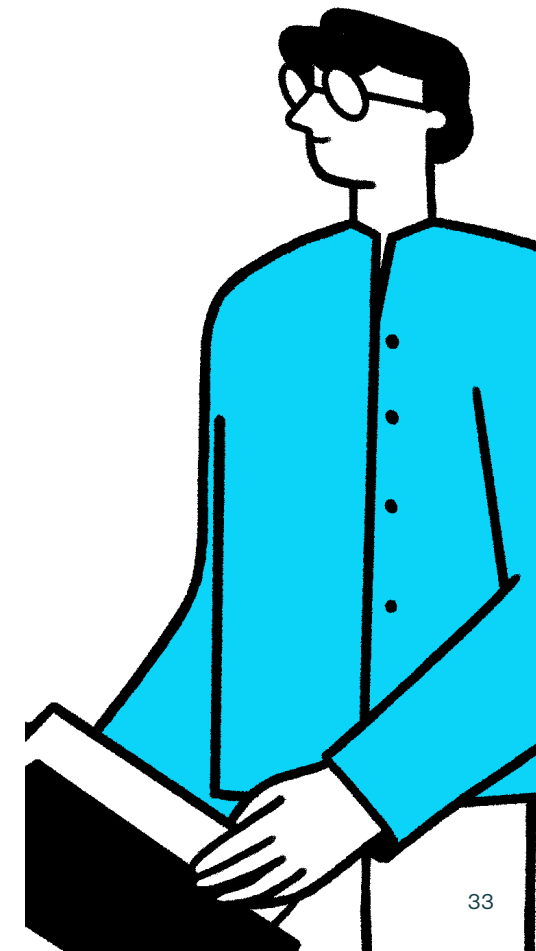
It conducts its activity according to the United Nations instruments, in particular the Universal Declaration of Human and Labour Rights, the International Covenant on Economic, Social and Cultural Rights and the specific guidelines for the protection of vulnerable people and groups that aim to eliminate racial and gender discrimination, protect the rights of children and migrants, people with disabilities and indigenous communities, while also subscribing to the Global Compact and implementing the Guiding Principles for Business.

Within the scope of the International Labour Organisation instruments, EDPR implements the Tripartite Declaration of Principles on Multinational Enterprises and Social Policy, including the Eight Fundamental Principles and Rights

at Work, which aim to guarantee Trade Union Freedom and Collective Bargaining, the elimination of Forced or Compulsory Labour, the effective abolition of Child Labour, the elimination of discrimination in Employment and Occupation, respect for the rules on Working Time, the protection of Health and Safety at Work, the guarantee of payment of a minimum wage and the special rights of indigenous peoples.

EDPR's commitments apply to all its decisions, to current operations and investment projects, to the relationships it establishes with suppliers and to the projects it develops in partnership. Through the Human and Labour Rights Policy, EDPR defines the organisation of internal processes and assigns responsibilities in order to guarantee the application of due diligence, the mechanisms for consultation and reporting, the obligations of compensation, reporting, communication and training as well as the extension of commitments to its business relations.

EDPR aims to be a benchmark company in the protection and respect for human rights, pursuing a policy of zero tolerance towards any risk of breach in this area.



We must

01. Respect and comply with the legal and regulatory rules on Human and Labour Rights in force in the jurisdictions applicable to the EDPR Group, with reference to the principle of the highest requirement.

02. To ensure the commitments freely accepted in all EDPR's areas of intervention, regardless of the level of demand of the national and local legislations, guaranteeing the human and labour rights internationally established by the United Nations and the International Labour Organization.



03. Ensure compliance with the commitments assumed in EDPR's "Declaration of respect for Human and Labour Rights", maintaining a Human and Labour Rights Monitoring Programme to identify risks and to act in order to avoid, minimise or repair any negative impacts arising from the Company's business and activities.

We must not

01. Participate in or consent, actively or passively, by action or omission, to practices that may constitute any violation of Human and Labour Rights, reporting these whenever they may occur.

02. Accept or collude with any form, even subtle or less obvious, of violation of human and labour rights by third parties who supply products or services to us.

03. Employ child, juvenile or forced labour, nor agree to such practices by third parties who supply, directly or indirectly, products or services to us.



Examples

Question



Someone told me that one of our service providers is under investigation for alleged use of forced labour. The audits carried out never found any reasons for concern. Should I ignore these rumours?

Answer

No. You should report it so that consideration can be given to opening an investigation proceeding where information can be requested from the service provider and a new audit can be carried out, seeking to eliminate any suspicion.

Question



EDPR is developing a wind farm in a region where part of the local community is against the construction of the wind farm. I heard rumours that a competitor company that had the same problem in that region decided not to consult the local population so that the project would not be blocked. Should we do the same?

Answer

No. For EDPR, maintaining a close relationship with the communities where it operates is essential. We should establish a regular, open and honest dialogue, try to understand their needs, respect cultural integrity and try to contribute to improving the living conditions of local populations, recognizing the rights of ethnic minorities and indigenous peoples.

Find out...



Related information

- [Empowering our communities](#)
- [Human and Labour Rights Policy](#)
- [Health and Safety Work Policy at EDPR](#)
- [Sustainable Procurement Policy](#)
- [Code of Conduct for Suppliers](#)
- [Code of Conduct for Top Management and Senior Financial Officers](#)
- [Procedure for Managing Claims](#)



We give everyone a voice

- Management
- People Management Officers/
Persons in charge of People Management
- Those responsible for Service Provider and/or
Procurement Management Units
- Ethics & Compliance Officer
- [Speak up Channel](#)



Relationships of Trust

- 2.1 Relationship with Shareholders
- 2.2 Relationship with Customers
- 2.3 Relationship with Suppliers
- 2.4 Relationship with Communities
- 2.5 Competition

2.1 Relationship with Shareholders

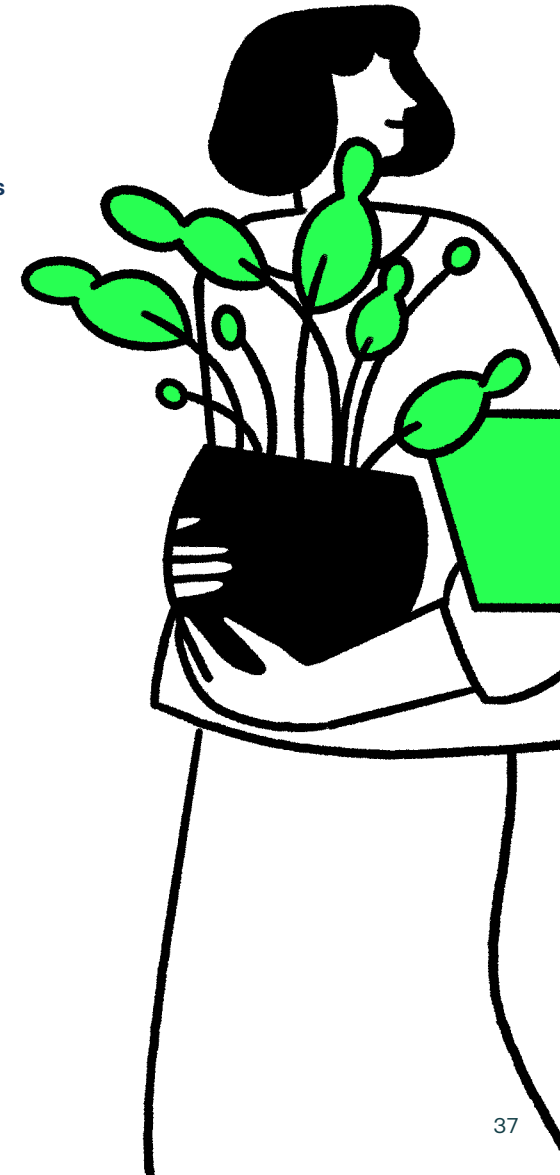
EDP is **committed to creating value** for its shareholders.

“Shareholder value” is supported in strategic decisions that influence the sustainability of the Company’s various businesses, excellence in execution and the delivery of solid results according to plan.

Shareholder confidence, decisive for investment in the development of the Company, is thus a counterpart to the crucial choices made, such as the anticipated investment in the massive production and use of renewable energies, together with a robust sustainability policy, materialised in particular through the active contribution of various international commitments in terms of human rights, labour, the environment and the fight against corruption.

The focus on “being 100% green by 2030” is today a new challenge that, once again, the Company embraces in anticipation, and which will enable it to continue to **ensure sustainable and distinctive business in the energy sector.**

In complex and demanding contexts in which factors such as regulation, government policies and the evolution of markets and economies, among others, significantly condition the Company’s performance, EDPR honours its commitments to this important stakeholder **through firm action in which integrity and transparency** are also essential.



We must

01. Inform the market, in a transparent manner, about the Company's performance, taking into account the legal obligations and the needs of the stakeholders, providing, in the information supplied, qualitative and quantitative elements identifying economic, financial, social, environmental and reputational risks, in a complete and clear manner and ensuring the quality of the information provided.

02. Provide the market with due knowledge of the existence of any event regarding the company, the disclosure of which is likely to interfere with the respective economic, environmental or social situation.

03. Establish policies and procedures that ensure the separation of EDPR's interests from those of its shareholders.



04. Respect the principle of equal treatment for shareholders, and for all other stakeholders, providing necessary information in a timely, appropriate, truthful, transparent and accurate manner.

05. Include the risk of bad ethical practices in the general management of corporate risk, identifying the respective warning signs.

06. Have systematic knowledge of the expected economic performance of our areas of activity, seeking to contribute actively towards achieving the objectives set.

We must not

01. Undertake, under any circumstances, acts that jeopardise EDPR's reputation, namely acts related to financial matters, corruption and bribery, conflicts of interest, or use of information and assets.

02. Fail to challenge the adopted practices, always in a constructive context and given that it is of crucial importance to promote efficiency.



Examples

Question



Answer

I was asked to analyse a possible future investment by EDPR in a new region from the perspective of my area. The following day, I was tipped off by a colleague that I would have to give feedback that same day, as the decision was about to be made at the Investment Committee level since the project had an above average return. Should I shorten the procedures, skipping some analyses, in order to give an answer within that period?

Any new investment option should be carefully considered. It must always be ensured that all risks, which can be discerned at the time of decision making, are analysed and taken into account. If you are unable to respond within the set time frame, you should provide all the information and analysis you have available, warning transparently that it has not been possible to complete the analysis process.

Question



Answer

When analysing a potential partner of EDPR in a new business, my team's study took into account several risk criteria, namely financial and profitability ones. Should I also ensure the ethical and integrity assessment of the elements that make up the partner's future management team if the deal comes to fruition?

Yes, and indeed EDPR already takes this analytical aspect into account. The risk assessment of the partnership from the ethics and integrity standpoint is essential, so that any new relationship with third parties does not compromise EDPR's reputation from any point of view. Economic Performance robustness is also based on the pillar of Ethics and integrity in business.

Find out...



Related information

[Investors](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[EDPR Sustainable Development Principles](#)

[EDPR Stakeholders Relationship Policy](#)

[Financial Management Policy](#)

[Corporate Risk Management Policy](#)

[Procedure for Managing Claims](#)



We give everyone a voice

Management

Heads of financial areas or CFO
(Chief Financial Officer)

Ethics & Compliance Officer

[Speak up Channel](#)

2.2 Relationship with Customers

EDPR understands the specific and changing dynamics of the electricity market and acts in constant pursuit to provide renewable energy and project-related products developed and undertaken by the Company that create value for its customers, offtakers and third parties, and support them in achieving their **sustainability goals**. The creation of value translates into stable, long-term relationships, which contributes to the growth of the Company and its outcomes.

This management logic based on “customer value” assumes commitments from the Company in terms of **establishing fair prices, clear and trustworthy communication** about the characteristics and advantages of the marketed solutions, providing a high-quality service based on robust operations, among others.

Also taking into account the demanding regulatory context of the sector, EDPR has implemented, whenever necessary, the mechanisms that ensure scrupulous compliance with the duties to which it is bound to.



We must

01. Produce and present honest, transparent commercial proposals adapted to the needs of current and potential customers.

02. Ensure that the advertising messages we transmit do not include discriminatory elements of any kind.

03. Provide relevant, truthful and accurate information, in language that is accessible and adapted to needs, responding to requests, queries and complaints.

04. Act with rectitude, courtesy and professional pride in the relationships with customers, respecting their rights, sensitivities and diversity.



05. Promote ongoing improvement in our performance, as well as the quality of the products and services we provide.

06. Set up and maintain simple and effective contact channels.

07. Promote the adoption of responsible behaviour by customers, and consumers in general, which has a positive impact on the environment and society.

We must not

01. Under no circumstances disregard the protection of our customers' personal data, namely by not using the data collected for purposes that are different and incompatible with those for which they were collected or for marketing purposes without the necessary consent from the owner.

02. Exploit our customers' lack of knowledge or vulnerabilities to promote new products and services.

03. Include derogatory messages in formal and informal communication regarding our competitors and their products and services.

04. Use stereotypes that diminish human dignity, or others that conflict with the laws in force, in either advertising or marketing campaigns.



Examples

Question



While entering into the Power Purchase Agreement with an offtaker related to a project developed by the Company, I noticed a potential delay in the project and I am concerned about communicating this information to our offtaker due to the consequences that may arise. What should I do?

Answer

You should always be transparent with our offtakers and inform them of the latest updates related to projects developed by the Company and within the scope of agreements entered into.

Question



After entering into a contract with an offtaker, I am going to publish and disclose the details of the contract, but I am not sure if the offtaker will give consent. What should I do?

Answer

You should always coordinate and agree with the offtaker the information to be disclosed regarding the agreement, and no communication should be made without their agreement.

Question



In a market where EDPR operates and where the energy sector is regulated, can I offer services – electricity, gas or others – to potential customers without referring to other commercial operators?

Answer

The most appropriate will be to inform potential customers that there are several commercial companies operating in the market and, after this explanation, to present in detail EDPR's commercial services, valuing in a correct and respectful way the distinctive factors of the Company's solutions.

Question



We are working on an image campaign, and we would like to use a photograph that includes a topic that can be considered sensitive from the point of view of society. Can I use the photo?

Answer

It is important to consider whether the photograph in question may cause discomfort or adverse comments from any individual. If so, we should refrain from using it.

Find out...



Related information

[EDPR Stakeholders Relationship Policy](#)

[EDPR Integrity Policy](#)

Procedure for Managing Claims



We give everyone a voice

Management

Heads of the Energy management areas

Ethics & Compliance Officer

[Speak up Channel](#)

2.3 Relationship with Suppliers

EDPR, as an “extended” company, currently incorporates a set of partners, with whom it works and shares responsibilities, who act and speak on our behalf with customers, citizens and other stakeholders

Relations with partners should favour the alignment of their actions with EDPR’s global strategy for sustained growth, particularly with regard to full respect for human rights and the assumption of a commitment to early decarbonisation.

Maintaining relations of trust with these companies is fundamental to EDPR’s success. The success of the partnerships we build depends on how we choose them and the commitment we all demonstrate in strengthening this relationship.

Our relationships with suppliers are based on criteria of **impartiality, fairness and loyalty** and we respect their independence and identity.

Under no circumstances does EDPR use its possible dominant position in the market to gain advantages in its relationship with its suppliers.



We must

01. Select suppliers based on EDPR policies and procedures which include ethical, technical and economic selection criteria – which are clear, impartial and pre-determined.

02. Ensure suppliers' compliance with health and safety standards and practices, environmental rules, labour and Human and Labour Rights legislation as well as other applicable laws, using audits for verification whenever critical suppliers are involved.

03. Enhance understanding of the value chain of EDPR's critical suppliers and of the ethical risks inherent to the contracts entered into, in order to ensure relationships in line with EDPR's values.



04. Responsibly scrutinise the conditions under which equipment and materials acquired by EDPR from different suppliers comply, at their origin, with the established international standards.

05. Respect each partner's own identity, but require them to fulfil, when entitled to act on EDPR's behalf, the duties set forth in this Code.

06. Ensure the confidentiality of information from suppliers and respect their intellectual property.

07. Ensure that suppliers do not become economically dependent on EDPR by taking the necessary preventive measures.

We must not

01. Agree to participate in decision-making processes selecting suppliers, which may generate situations of a potential conflict of interests.

02. Impose unfair conditions on suppliers or fail to comply with agreed conditions, particularly in regard to payments.

03. Establish or maintain partnerships with suppliers that do not respect the ethical commitments they have undertaken with EDPR.

04. Instil fear to cause serious harm during negotiation in order to avoid compliance with an agreement or to obtain advantages outside of the agreement being negotiated with the supplier.



Examples

Question



I have received a request for an urgent replacement of equipment in one of our solar parks. An acquaintance of mine has a company that supplies them at competitive prices and is able to guarantee that the work will be carried out within the agreed timescale. Can I award the contract to this company without consulting other bidding companies?

Answer

This is not a correct procedure and disrespects EDPR Group rules. Approval without use of a prior tender procedure should only be undertaken in occasional, duly justified situations which have received line management authorisation. In addition, the fact that this company is owned by an acquaintance creates a possible conflict of interests that should not be allowed. You should report this to your line manager, giving all the information you consider relevant and remove yourself from the decision-making process. The new manager responsible for this should assess the effective urgency in terms of not using a prior tendering procedure and check which suppliers are able to respond to the request in order to assign this to the bidder who can offer the best conditions.

Question



I was contacted by a supplier who wanted to know why they were not awarded a particular tender. I am part of the team responsible for the technical analysis of the proposal. Can I provide them with the justification?

Answer

You can explain to the supplier the reasons why their tender was not selected for award, provided that you are authorised to do so.

Question



The employee of a company which wants to bid for a contract renewal process has asked me to provide them with information on the prices their competitors had charged in the previous contract. Getting this contract could be crucial for the viability of that company and they are prepared to lower the price they usually charge to get it. Can I provide this information?

Answer

You should not provide this information, unless it is public. None of the bidders should have access to any information that provides them with a business advantage.

Find out...



Related information

[Suppliers](#)

[Joining our partners](#)

[Sustainability in the Supply Chain](#)

[Procurement Policy](#)

[EDPR Stakeholders Relationship Policy](#)

[Code of Conduct for Suppliers](#)



We give everyone a voice

Management

Ethics & Compliance Officer

Procurement area

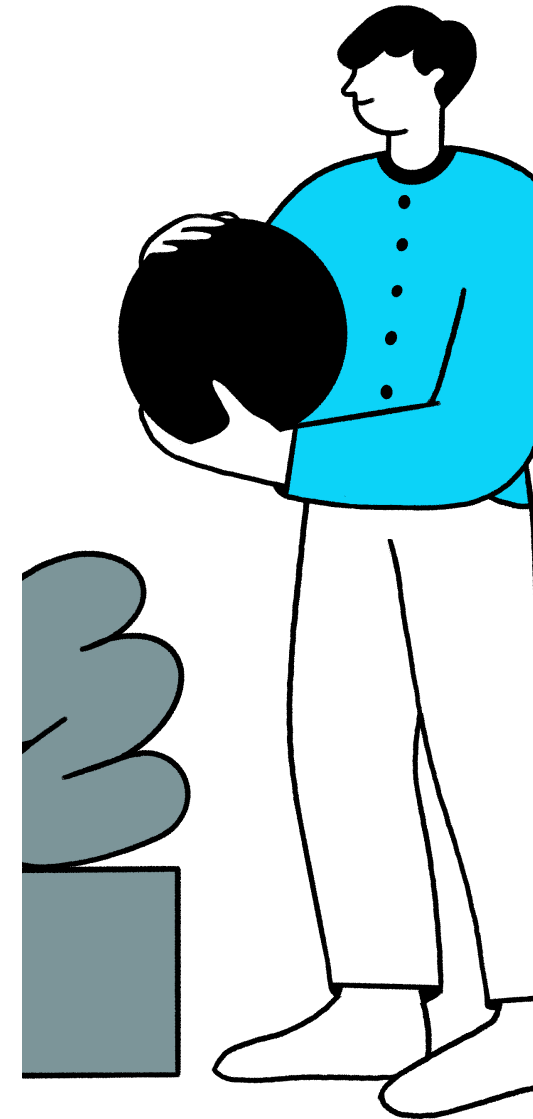
[Speak up Channel](#)

2.4 Relationship with Communities

EDPR creates a positive impact on society by valuing not only its employees and partners, but also the communities in which it operates, through respecting their sensitivities and cultures. The promotion of **sustainable development in the geographies where we are present and with the communities** with whom we interact is one of the pillars on which our business strategy and our reputation are based.

We have developed a **culture of corporate citizenship and involvement with society** through cultural initiatives, such as promoting access to culture and art and protecting cultural heritage, but also socially, such as promoting social inclusion and the adoption of sustainable lifestyles, valuing energy inclusion and access to energy. We equally promote environmental initiatives, such as the protection of natural heritage and biodiversity, but also, and especially, the promotion of energy efficiency, renewable energy and decarbonisation.

Understanding, communicating, trusting and cooperating are the guiding commitments for the active and transparent involvement that EDPR continually promotes with **local communities**.



We must

01. Maintain an active relationship of proximity with local communities in the regions where we operate, engaging in regular, open and frank dialogue, seeking to learn about their needs, respecting their cultural integrity, seeking to contribute to improving the living conditions of local populations.

02. Maintain appropriate communication channels to inform citizens about the environmental impacts of our infrastructures as well as the risks and dangers of energy, whether these result from its normal use or from its misuse, or from the exploitation of facilities and equipment under its responsibility.



03. Promote access to energy for communities isolated from the electricity grids, efficient energy use and the adoption of more sustainable lifestyles.

04. Acknowledge the rights of ethnic minorities and indigenous peoples where appropriate.

We must not

01. Engage, on behalf of EDPR, in actions of a social nature that do not reflect our commitments and strategies of involvement with the community.

02. Begin any intervention without consulting stakeholders to assess the possible social impacts and define the necessary mitigation measures.



Examples

Question



Answer

I am participating in a fundraising campaign for a non-profit organization in the area where I live. Can I ask co-workers to contribute?

You should not solicit monetary contributions from colleagues in the workplace. Alternatively, you can contact your line management to try to involve the company in the effort to help that institution, using the departments with responsibility for donations and sponsorships.

Question



Answer

I was asked to help repair, over the weekend, free of charge, the electrical facilities of the Sport Club in my town. I would like to do this and also ask for help from some co-workers at EDPR who have technical skills in this area. I consider this to be skills-based volunteering, but I don't know if I can do it.

You should check whether the work of that institution fits within EDPR's programmes, particularly its policy regarding community relations or its volunteering policy. If this is the case, you should submit this request to your line manager to assess whether there is a possibility of institutionally involving the company in this assistance to the Sports Club.

Find out...



Related information

[Empowering our communities](#)

[EDP Program Y.E.S. – You Empower Society](#)

[Principles of Sustainable Development](#)

[Social Investment Policy](#)

[Volunteering Policy](#)

[EDP's Commitment to the Sustainable Development Goals](#)

[Stakeholders Relationship Policy](#)

[Internal area dedicated to Social Impact](#)

[Procedure for Managing Claims](#)



We give everyone a voice

Management

Sustainability Committee

Health and Safety areas

Sustainability area

Heads for the Environment Department of Business Units

Ethics & Compliance Officer

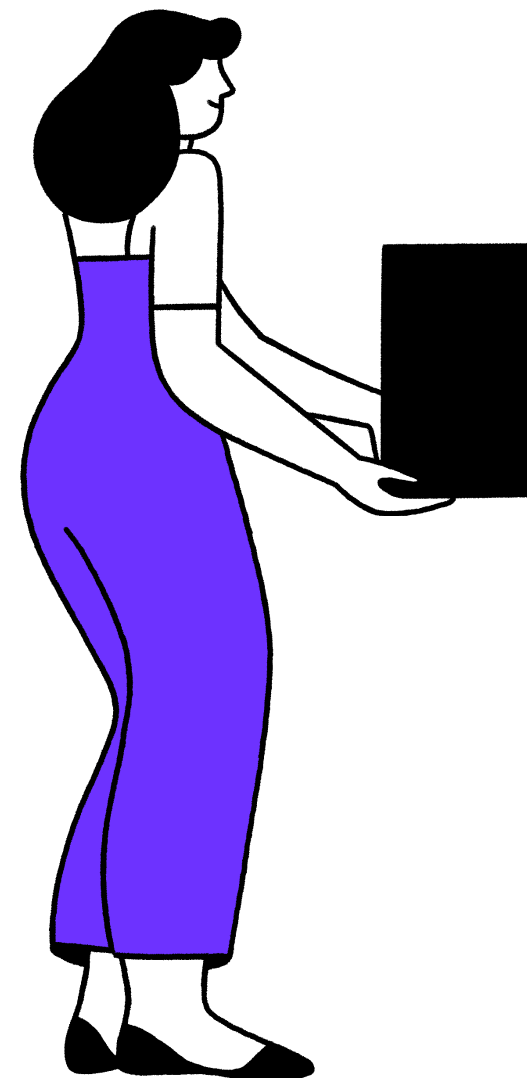
[Speak up Channel](#)

2.5 Competition

The development of businesses today faces very strong competition in terms of various factors – procurement processes, involvement of middlemen, innovation, human resources and talent, visibility among stakeholders, and many others – which require an **honest and respectful approach towards stakeholders**, namely competitors.

It is also important to bear in mind that competition legislation is currently, in most countries, very demanding and restrictive, and that failure to comply with it is subject to heavy penalties, which can have collateral effects on the credibility and reputation of institutions.

The requirement to comply with the highest ethical standards and the expression that EDPR currently has on a global scale, both in terms of the areas of activity in which it intervenes in the energy sector and in terms of the jurisdictions in which it is represented, gives it a significant responsibility in this matter, as **integrity and good reputation in business practices** are decisive in reinforcing the trust of its customers. Therefore, EDPR seeks to act in full compliance with **the best practices of healthy competition**, undertaking to train and update its employees on national and international competition legislation and prohibiting any practices restricting competition, even in countries where there is no legislation on this matter.



We must

01.

When in doubt about the compliance of behaviour being practised or observed in competition matters – whether in relation to competing companies, in relation to offtakers or suppliers, in duties representing professional or sectoral associations and in the analysis or construction of merger proposals, acquisitions or bilateral agreements, among others – employees must consult with the competent bodies regarding this matter in the Company, while always maintaining an integral and prudent attitude.



02.

Be particularly careful in oral and written communication concerning the company's strategic information, namely regarding commercial strategy, company portfolio and projects being developed, contract quantities and prices, invoicing, investments, sales, among others, in order to ensure that no doubts arise concerning the compliance of what is communicated with competition rules and that the required ethical standards are not questioned.

We must not

01.

Adopt any practices prohibited by competition law.



02.

Under no circumstance, use information about competing companies obtained by non-legal means, or which leads to a violation of the applicable competition laws.

Examples

Question



Answer

A property owner we are interested in has already signed a contract with another company. We have been informed about the amount he will receive and are debating whether we should offer him more money to terminate the lease he signed and sign with EDPR, and cover all the costs and charges he might have to rescind.

No. If the owner has already signed with our competitor, bothering him with an offer to terminate his contract is poor business practice that EDPR should not follow in the development of its projects.

Question



Answer

As a result of due diligence on M&A transactions, we have received technical wind farm availability data. Can we use this data in the future to make decisions outside the scope of the M&A transaction from which we originally obtained the data?

No. Availability data is privileged information in relation to a transaction and can only be used within that context.

Find out...



Related information

[Healthy Competition Practices](#)

Procedure for Managing Claims



We give everyone a voice

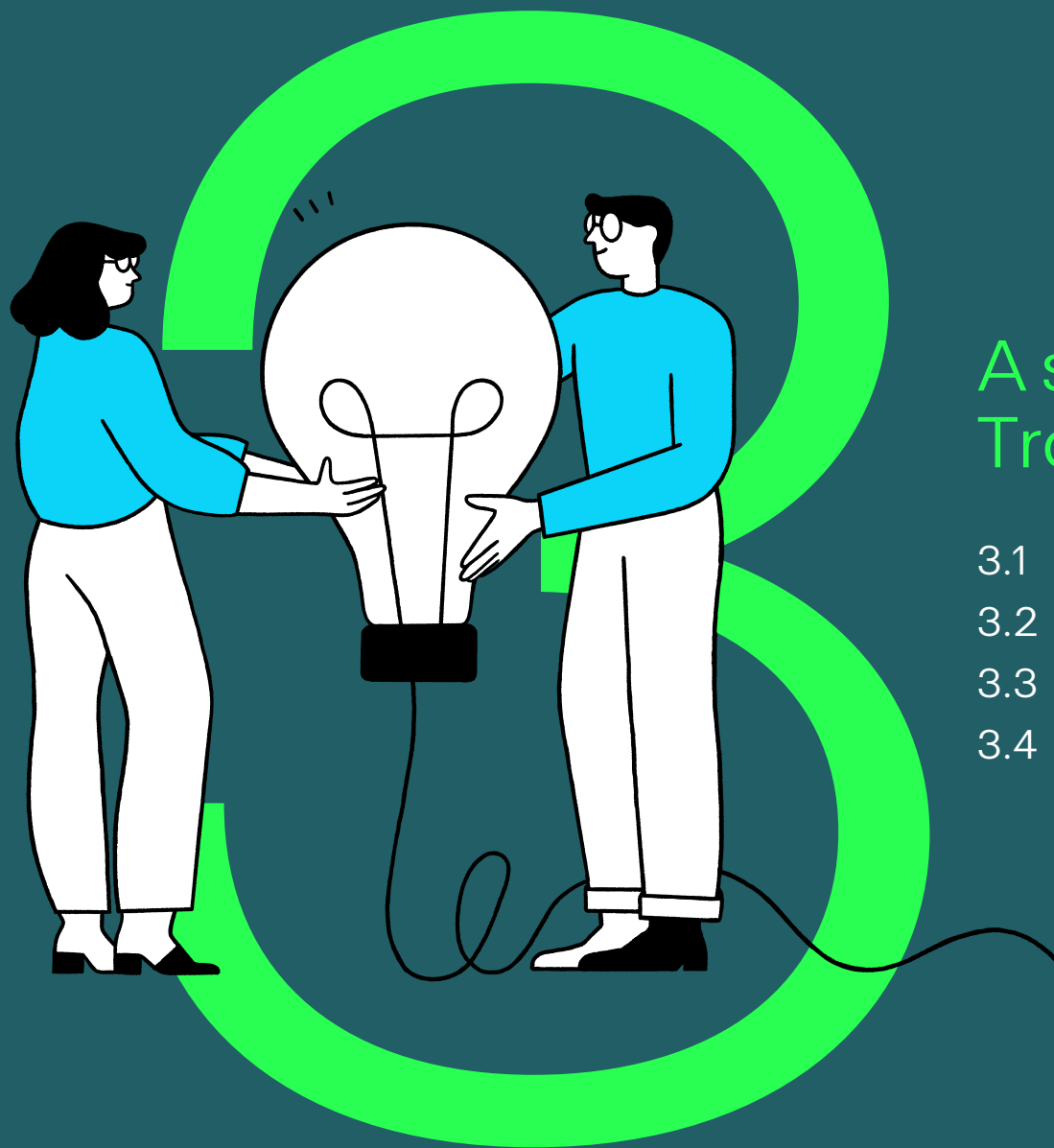
Management

Compliance Business Partners

Legal Advisory Department

Ethics & Compliance Officer

[Speak up Channel](#)



A sector undergoing Transformation

- 3.1 Environment
- 3.2 Energy transition
- 3.3 Digital revolution
- 3.4 Entrepreneurship and Cooperation

3.1 Environment

We look at the Environment as an asset and its preservation as a duty.

A strong culture of environmental risk management is essential **to reduce our ecological footprint**. we are therefore committed to implementing the best solutions to avoid or mitigate the environmental impacts of our activity and to continuously improve our performance.

We effectively address risks and opportunities by integrating environmental management into business processes, strategy and decision-making, aligning them with other business priorities and incorporating environmental governance into its global management system.

The success of our environmental policy depends on everyone's commitment, the way we think, act and influence.



We must

01. Act in accordance with the precautionary principle, when our activities may result in serious and irreversible damage to human health or the environment, even if uncertain but scientifically plausible. In these situations, we should take measures to avoid or mitigate these effects.

02. Align our activities with national and international environmental protection strategies.

03. Promote environmental awareness by acting as mobilizing agents in the defence and protection of the environment.



04. Deepen our knowledge of the environmental risks and impacts of our activity, namely by using climate risk and opportunity assessment procedures, to improve decision-making.

05. Actively promote the development of more environmentally sustainable technologies along the value chain.

06. Cooperate with environmental authorities and listen to other stakeholders in the quest for ongoing improvement in our environmental performance.

07. Promote our environmental policy internally and with our partners and other stakeholders.

08. Promote and collaborate to achieve the United Nations Sustainable Development Goals.

We must not

01. Use or authorise materials/products, technical solutions and/or internal or outsourced operational processes that endanger or degrade the environment, always favouring alternatives that are less harmful to the environment and economically competitive with the former.

02. Ignore or neglect situations which jeopardise the environment, the company's legal compliance or defraud the expectations and needs of stakeholders.

03. Make it difficult to analyse accidents or near-accidents of an environmental nature by refusing to participate or omitting relevant information.



Question



While performing a maintenance task on one of the turbines, I saw that the equipment had an oil leak, causing a negative environmental impact on the ground below. Due to a shortage of replacement equipment, the expected time to fix and get the turbine running again is much longer than normal and may jeopardise production targets. What should I do?

Answer

The turbine should be stopped immediately to avoid spills that could impact the environment.

Question



On a weekend outing with my family, near one of our wind farms under construction, a lot of waste materials that clearly had not been treated according to EDPR's environmental policies and procedures. What should I do?

Answer

You should immediately report this situation, preferably to the department responsible for the work and request that the waste left at the site be collected.

Question



I am part of the EDPR team that coordinates field work at the construction site. One day, I noticed that hazardous waste that should be treated properly by a waste management company was being burnt. I was told that this was an exception to avoid delays in the construction schedule. Considering this response, should I report the situation because this action endangers businesses working on site, in addition to polluting the environment?

Answer

The contract manager should report the situation in writing, making everyone on site comply with legal obligations and EDPR policies related to environmental management and impact on our projects.

Find out...



Related information

[Protect our planet](#)

[Sustainable Development Principles](#)

[EDPR Environment Policy](#)

[EDP Group Materiality](#)

[EDP's Commitment to the Sustainable Development Goals](#)

[Internal area dedicated to Sustainability](#)

[Procedure for Managing Claims](#)



We give everyone a voice

Management

Sustainability Committee

Sustainability, Health and Safety Department

Environment Department for the Business Units

Ethics & Compliance Officer

[Speak up Channel](#)

3.2 Energy transition

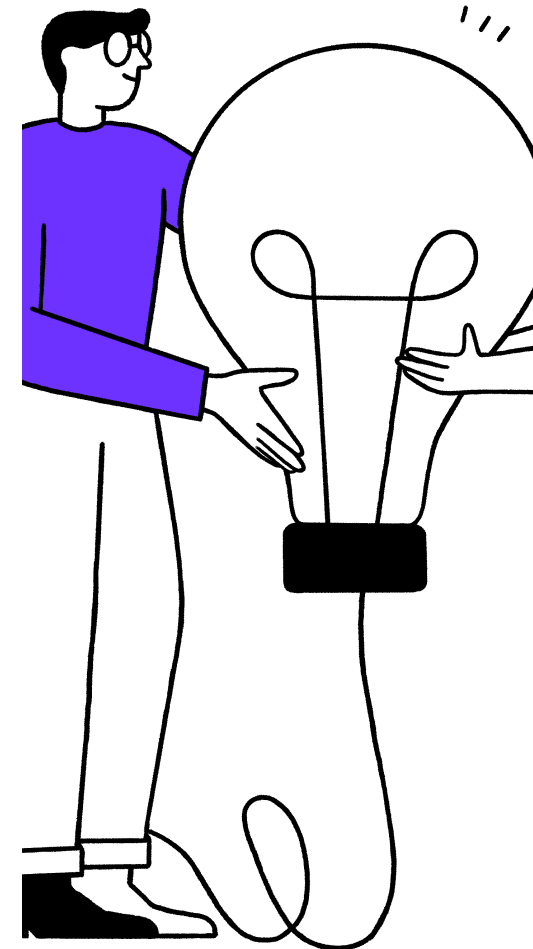
The world is undergoing a profound process of transformation in search of sustainable development in where one of the major challenges is to **slow down ongoing climate change** while ensuring a **fair energy transition**.

The escalation of climate change confronts mankind with the urgent need to reduce CO₂ emissions. If global warming is not limited to a maximum of 1.5 °C, extreme events, natural imbalances and rising oceans will have devastating effects on infrastructure and cities, jobs, health and social well-being. The consequences for the environment and biodiversity will also be incalculable and dramatic. Climate urgency requires all companies to take on the ethical duty to substantially **reduce** and **eliminate**, where possible, **carbon dioxide emissions**.

At EDPR we work daily to lead the energy transition, taking advantage of our ability to adopt new technologies to generate more value for our stakeholders. We do so by being impact-oriented and anticipating future challenges, with the courage to actively promote change.

The Company is committed to achieving carbon neutrality in its activities by promoting emission reductions with its business partners and empowering communities. Throughout its value chain, EDPR will continuously promote **energy efficiency and the replacement of fossil energies by renewable energies**, with a view to contributing to a new economy and ways of life that respect the planet and promote social well-being.

In EDPR's view, **electrification is one of the essential vectors for the decarbonisation of the economy, when produced from renewable energies**. Through continued innovation, renewable electricity production must increase to replace fossil fuel consumption in services, industry and transport. When electrification is not a viable solution, then technologies such as green hydrogen (also produced from renewable energy) could ensure the remaining decarbonisation of the planet.



We must

01. Contribute to ensuring affordable, reliable and sustainable energy, promoting the adoption of more flexible, clean and efficient production technologies.

02. Create emergency plans and strengthen the resilience of infrastructure to cope with extreme events.

03. Develop the intelligent management of energy production and consumption.



04. Foster technological innovation and invest in solutions that increase the production and consumption of renewable energy.

05. Increase of "energy literacy", both internally and externally, by helping to place us, as well as the population in general, with greater and better capacity to intervene in a fair and equitable energy transition.

06. Promote the development of public measures to address energy poverty and the protection of vulnerable consumers.

07. Stimulate the development of energy efficiency measures and services with customers.

08. Contribute to the increased use of renewable energy in transport and industries.

09. Contribute to the awareness on climate change and energy transition.

We must not

01. Implement solutions or make investments without prior analysis of climate, environmental and social impact and without ensuring compliance with the EDPR Code of Ethics and Policies.

02. Purchase products or services without assessing the production and supply chain and without ensuring the sustainability principles advocated by EDPR.

03. Move away, individually and collectively, from the fight for decarbonisation and for a fair and inclusive energy transition for all.



Examples

Question



Answer

In the management team, we were planning a series of working meetings which would involve travelling to different regions. I suggested that we replace at least part of those trips with online sessions. Although my proposal was not accepted, did I act correctly?

Yes, you did. An action that is more in line with EDPR's commitments to reduce CO₂ emissions is the most appropriate.

Question



Answer

Production equipment for self-consumption facilities contacted me to inquire about EDPR's possible interest in a partnership to sell his products. I explained that EDPR produces and sells its own energy and that, as such, we would not be interested in solutions which would reduce energy consumption. Did I do the right thing?

No. First of all, you should bear in mind and remind the supplier that EDPR has instituted a broad market consultation process that any supplier must go through. On the other hand, you should also keep in mind that self-consumption is an essential part of the energy transition process that we should encourage because it helps to raise general awareness of the challenge for all, as it reduces emissions, losses, investments and helps to electrify consumption.

Find out...



Related information

[Leading energy transition](#)

[Sustainable Development Principles](#)

[EDP's Commitment to the Sustainable Development Goals](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Internal area dedicated to Sustainability](#)

[Procedure for Managing Claims](#)



We give everyone a voice

Management

Sustainability Committee

Sustainability, Health and Safety Department

Environment Department for the Business Units

Ethics & Compliance Officer

[Speak up Channel](#)

3.3 Digital revolution

Technology is a key part of EDPR's strategy and is decisive in the way the company manages its assets and relates to its customers and stakeholders in general.

The digital revolution we witnessed a few years ago is an opportunity to build a better society, at the service of Humanity, where competencies can be increased and more balanced life solutions can be created in the everyday life, in the professional context, in health and well-being in general. It is known, however, that this revolution also entails new risks that can have significant impacts, particularly economic and on the lives of individuals and society as a whole, and therefore also of an ethical nature.

EDPR is aware of its responsibility in this matter, unequivocally recognising the need **to ensure careful and ethically committed management of information systems**, at all stages of the information life cycle, including system design, source selection, knowledge extraction, data integration and analysis, as well as the development of analytical model algorithms. Cyber-security also deserves particular attention these days, and EDPR has increased the attention paid to its systems in this area.

Thus, the Company is aware, in its action in this field, of the need to carry out a **systematic assessment of ethical risks**, paying particular attention to the use of Artificial Intelligence in the various developments, the **guarantee of the quality of its business data** and the consistent practice of robust, up-to-date cybersecurity procedures.



We must

01. Identify, assess and document ethical risks, in the stage prior to the design or acquisition of technologies, mainly disruptive technologies, such as artificial intelligence, robotics and 5G.

02. Ensure, right from the system design stage, the incorporation of ethical criteria in decision-making, aiming at the applicability of digitalisation concepts for the benefit of society in general and, in particular, ensuring proportional human control in all autonomous and critical systems.

03. Prevent, still in the design stage, ethical risk through the use of quality and integrity assurance processes of data and methods, through the clear knowledge, and registration, of the data and algorithms involved.



04. Ensure transparency and interpretation of the results obtained, guaranteeing that they are auditable and reproducible.

05. Strive for the security of data, systems and analytical models, taking into account the potential risks associated with a security breach, in full compliance with the Group's information security policy and standards.

06. Monitor systems on an ongoing basis also from the point of view of their potential ethical impact.

07. Promote in users and producers of technology a culture of taking responsibility for the impacts of their actions, ensuring the necessary training.

08. Foster everyone's responsibility in identifying opportunities for improvement and efficiency, leading to more sustainable goals, through new digital technologies.

09. Strongly promote the development of employees to adapt to technological transformation, stimulating the necessary training, retraining and adaptation, and creating qualified functions for professional paths sensitive to ethical technological risk.

10. Promote scientific employment to attract people with highly specialised knowledge in new technologies and at the same time advocate for their retention at EDPR.

We must not

01. Allow the development of systems or analytical models that promote or result in some kind of injustice or discrimination.

02. Enable the procurement and development of systems that do not comply with cyber security best practices, causing harm to customers and society.

03. Ignore signs of ethical impacts caused by any technology in use and fail to report them.

04. Allow undue storage of documentation, particularly when personal data is involved, in order to prevent negative impacts on the company, customers, suppliers and society in general.



Examples

Question



Answer

I have noticed that a recently acquired computer program seems to have a systematic bias that penalizes the female gender, although I am not entirely sure. Should I report this suspicion, or should I just keep an eye out?

If in doubt, you should report your concern immediately, so that a comprehensive and accurate assessment of your suspicion can be carried out.

Question



Answer

I am part of a task group that is developing an application which uses Artificial Intelligence and I believe that limits are not being correctly applied on the algorithm, that is, on the “machine’s performance”. Have already I’ve alerted the group more than once, but everyone thinks I am being overzealous. I am convinced that we are not making a proper risk assessment of this project. How should I proceed?

You should insist on this concern with the head of the task group and, if your concerns are still not addressed, you should use the other reporting channels for this purpose.

Find out...



Related information

[Our digital transformation](#)

Procedure for Managing Claims

Dedicated area

[Our digital transformation](#)

[Information Systems Security](#)



We give everyone a voice

Management

IT Department

Ethics & Compliance Officer

[Speak up Channel](#)

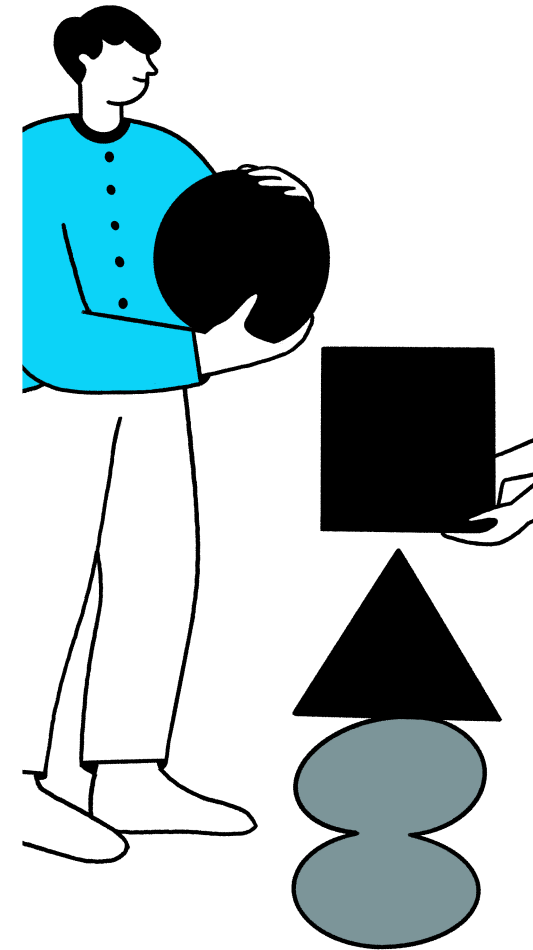
3.4 Entrepreneurship and Cooperation

In an era where technology and society are evolving at a faster pace than the market development, EDPR, anticipating the impacts and opportunities arising from this, **has committed to promoting innovation, creativity, collaborative practices, research, technological development and knowledge management in the field of energy.**

Nowadays, we are witnessing the transition from a competitiveness focused on factors of a tangible nature to a competitiveness in which the emphasis is on new working methodologies, and also increasingly on networks of companies that coordinate and cooperate through dynamic structures with varying duration.

In the digitally interconnected world, business ecosystems are becoming larger and more complex than ever and, while generating value, they also inevitably generate corporate risks from the actions of external parties. The first line of defence must be redefined by not being limited to organizational limits but extending to the broader network that adds value for all stakeholders.

In this paradigm, **the ethical performance of the various players and their respective risk management** becomes essential to ensure that the high pace of transformation and innovation does not overlap with the ethical principles assumed by EDPR and by each of its employees.



We must

01.
Encourage collaborative and cooperative practices with a common purpose.

02.
Ensure that in these new ecosystems all partners comply with commonly accepted ethical principles.

03.
Encourage openness and transparency in order to learn from mistakes.



04.
Promote balanced relationships with expectations appropriate to the stage of maturity of the entities involved.

05.
Create test environments appropriate for the technologies and/or business models to be tested, so that the associated risks are controllable.

We must not

01.
Breach the confidentiality of the information we access and, in particular, avoid exposing the intellectual property of third parties to situations that may lead to its appropriation by other entities.

02.
Personally invest in opportunities identified within the Company.



Examples

Question



Answer

I particularly liked a business idea developed as part of an internal project. I find it very promising, but unfortunately, EDPR does not intend to take it forward. Can I proceed with it using my own resources outside working hours?

Not as a rule, no. You may not use confidential business information that you have acquired during your work at EDPR for personal gain. However, there may be exceptions that should be discussed with your line manager.

Question



Answer

A group of start-ups with whom we will start working on collaborative projects asked me if I could organise a session to share best practices on Ethics and Compliance. Can I do this?

Yes. EDPR is in the habit of sharing its best practices, particularly in the area of ethics and compliance, and for this reason you can share them with these organizations that will now be part of our ecosystem.

Question



Answer

A friend asked me why is EDPR investing in start-ups as an alternative to other possible financial investments. What should I answer?

You should answer that EDPR's investment objectives in start-ups are not exclusively financial; EDPR believes that these new companies, normally dedicated to research and innovation, enhance the creation and transfer of technical knowledge, promoting efficiency and new business, but also new working methodologies. That is why making these investments is part of a search, not only for financial return, but also for a strategic relationship, mutually creating value (in addition to the aforementioned financial return) for EDPR and the start-up.

Find out...



Related information

[EDPR Stakeholders Relationship Policy](#)

[Procedure for Managing Claims](#)

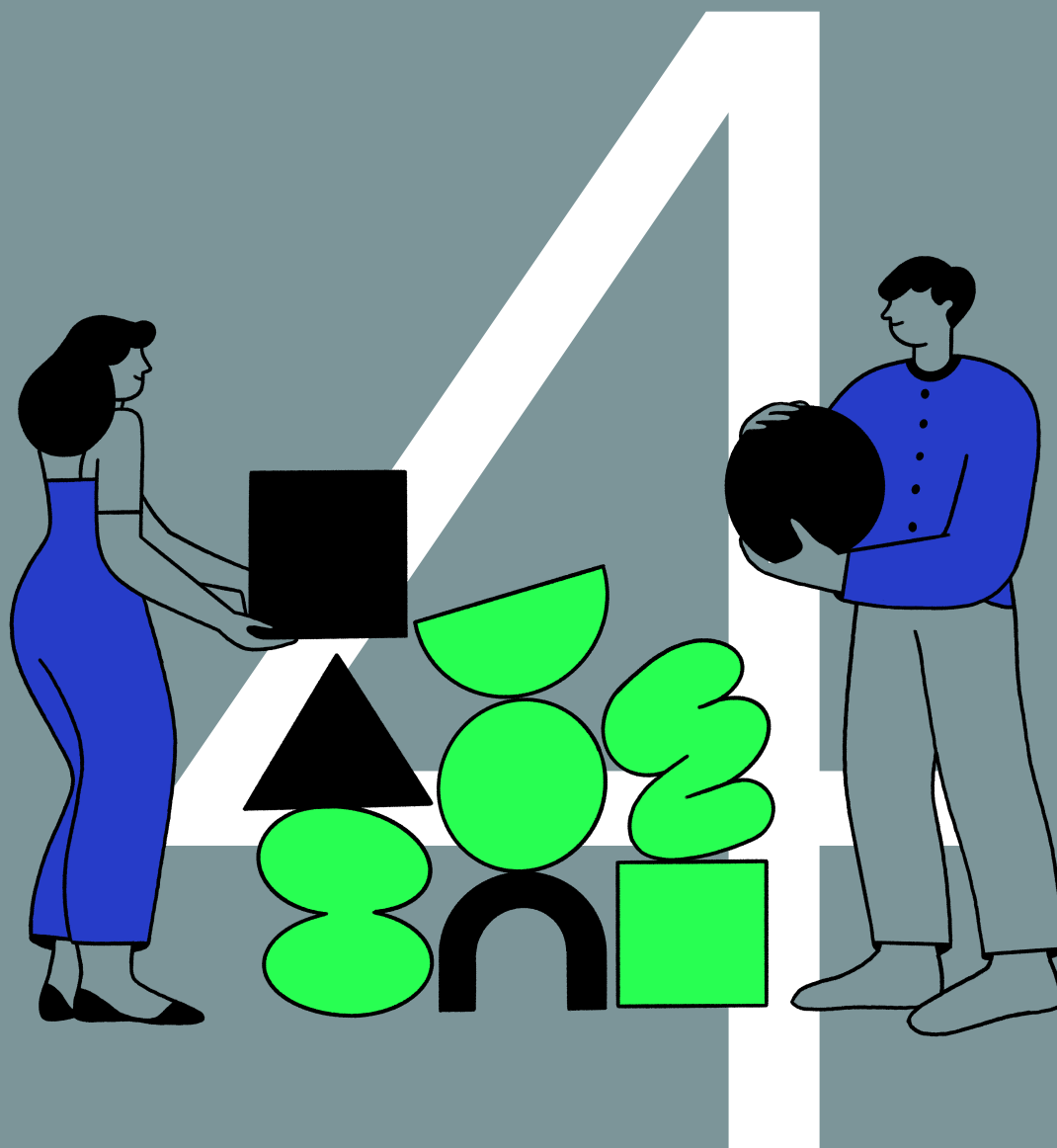


We give everyone a voice

[Management](#)

[Ethics & Compliance Officer](#)

[Speak up Channel](#)



Action with Integrity

- 4.1 Corruption and Bribery
- 4.2 Conflict of Interest
- 4.3 Gifts and Entertainment
- 4.4 Money laundering and countering the financing of Terrorism
- 4.5 Privacy and Personal Data Protection
- 4.6 Use of Company Information
- 4.7 Use of Assets

4.1 Corruption and Bribery

Illegal acts, whether by act or omission, such as corruption or influence peddling, jeopardise the peace, security and well-being of citizens as well as the stability of markets. These practices also undermine democracy and the rule of law, diverting resources needed for the growth and development of society, and promoting instability, insecurity and distrust among citizens. Therefore, according to a rationale of **zero tolerance, the prevention and fight against corruption and bribery has been widely and increasingly embraced** at a global level, namely through the adoption of laws and the promotion of cooperation between private entities and public authorities.

EDPR prohibits the practice of corruption and bribery, actively or passively, through acts or omissions, including the creation and maintenance of situations of favouritism through facilitation payments or other irregularities.

EDPR has **policies and procedures in place for the prevention, detection, correction and control regarding corruption matters.**



We must

01. Anticipate and clarify situations which may constitute or be perceived as corruption or bribery.

02. Respect, when dealing with employees and officials of public entities, the duties of impartiality to which they are subject, avoiding any action or omission that directly or indirectly has a fraudulent, coercive, manipulative or deceptive influence, and refraining from giving or promising them any type of benefit that is not due to them.

03. Disclose, comply and enforce internal regulations on facilitation payments, political contributions, donations and sponsorship, gifts and invitations to events, interactions with public officials and politically exposed persons and the prevention and management of conflicts of interest.



04. Comply with internal standards regarding due diligence in the identification and integrity analysis (Integrity Due Diligence) of third parties prior to establishing business relationships, ensuring the adoption of the foreseen and applicable risk mitigation mechanisms.

05. Report through the appropriate channels, any alarm signals or actions that may be associated with a potential act of corruption, receiving or offering undue advantages or any other illegal, criminal or administrative offences.

We must not

01. Solicit, accept, give or promise gifts, presents, loans, hotel stays, personal services or other gratuities, even in the form of preferential treatment from customers, suppliers, government authorities or any other person or entity connected to the Company's business, which could result in any undue personal advantage being obtained for the Company or for third parties.

02. Solicit, accept, give or promise any material or non-material advantage, when such advantages are not due.

03. Make, on behalf of the Company, monetary or other contributions to political parties.



Examples

Question



The inspector of a public entity responsible for the licensing of a wind farm, the development of which I am managing, has expressed concerns about the safety of one of the items of equipment used in that facility. So, to license the installation into operation, they mentioned that it would be necessary to carry out additional safety tests that could take a few weeks, unless they were paid an “emergency fee”, in order to prioritise these additional tests. The deadlines initially planned for the installation to start operating have already been exceeded and this additional delay may further compromise the attainment of my goals.
Can I make the payment and consider it an expense associated with licensing the installation?

Answer

No. Such a payment, made directly to an inspector, can be considered a form of corruption and bribery to overcome any constraints in the licensing process. You should check with the licensing authority if there is any process that allows urgent situations to be dealt with, ensuring that all necessary safety tests are carried out as quickly as possible and that all licensing expenses are duly supported by documents.

Question



A supplier wants to offer me a trip to the finals of a sports championship. This supplier wants to be awarded a tender opened by EDPR.
Can I accept?

Answer

No. The acceptance of offers/ invitations, when the parties are involved in negotiations, bidding, near prospect of contract review, or recently concluded contract review, is prohibited, except if they fit as common courtesy practices, appropriate to the context.
The acceptance of gifts must comply with the rules and limits defined internally, namely in terms of value and frequency, otherwise they must be approved by top management and the Ethics & Compliance area informed.

Find out...



Related information

[Ethics & Compliance](#)

[EDPR's Integrity Policy](#)

[Social Investment Policy](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Code of Conduct for Suppliers](#)

[Internal area dedicated to Integrity](#)

[Procedure for Managing Claims](#)



We give everyone a voice

[Management](#)

[Ethics & Compliance Officer](#)

[Speak up Channel](#)

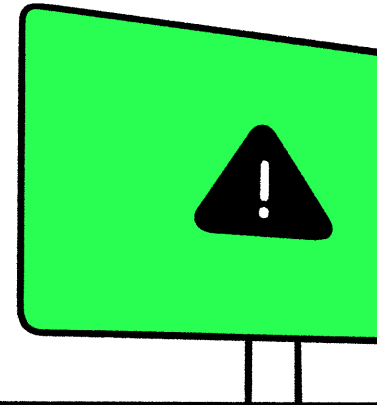
4.2 Conflict of Interest

A conflict of interest corresponds to a situation in which the aims or advantages that a certain act is intended to pursue or achieve may interfere with compliance with the duties of impartiality and objectivity or with EDPR's interests. Conflicts of interest may be apparent, situations that may be interpreted as a Conflict of Interest although they may not in fact be so; potential, situations arising from which a Conflict of Interest may arise in the future; real, situations of actual Conflict of Interest.

Any conflict of interest could damage the reputation of the Company, employee or partners involved. For EDPR, the ground rule is **transparency**. This means recognizing and disclosing all situations that create, or appear to create, conflicts of interests between our personal and EDPR's interests.

EDPR commits to developing and applying internal rules aimed at the prevention of conflicts of interest as well as to striving to ensure that in transactions in which it participates, mechanisms for their prevention are ensured.

EDPR has policies and procedures to ensure **impartiality and fairness in its actions and decision-making processes**, in situations of potential conflict of interests involving the company, employees or partners.



We must

01. Always act so that personal, family or third-party interests related to us do not prevail over the interests of EDPR and stakeholders.

02. Communicate to line managers and step away from, or encourage withdrawal from, the respective decision-making processes, in all situations that may generate conflicts between personal interests and the duty of loyalty to the company, such as: family or equivalent relationships in direct hierarchical or functional dependency; carrying out external professional activity that interferes with our duties or with the company's activities; ownership of legal, equity or family positions likely to interfere with the interests of the company or with the activities undertaken.



03. Be aware that there are limitations to the transaction of goods and the contracting of services by EDPR to related parties, such that we are bound to comply with the applicable internal rules.

04. Be familiar with the procedures for prevention, identification and resolution of conflicts of interest, both in general terms and in relation to Related Party Businesses, when covered by the Related Party Transactions Policy.

05. Obtain authorisation from management to carry out other professional activities, provided that they do not detract from work performance or interfere with the duties to the Company and do not present a risk of conflict of interest, duly confirmed by the Ethics & Compliance area.

We must not

01. Use information that we have access to because we are EDPR employees in situations benefiting ourselves to obtain personal advantages as well as for family or friends.

02. Carry out other professional activities during working hours.

03. Engage in any outside professional activity, whether remunerated or not, that affects the performance of our professional duties or EDPR's activities or interests, namely by negotiating on our own behalf or on behalf of others in competition with the Company.

04. Involve the Company in our personal activities, in political, religious, sectarian or partisan positions of any kind.



Examples

Question



A supplier, who is also a family relative, is making a tender bid for the supply of equipment to EDPR and I am involved in the awarding process. This supplier is a well-positioned candidate in the tender and highly likely to win. What should I do?

Answer

You must immediately report the situation to your manager and to the Ethics & Compliance area. This involves a conflict of interests so you will have to withdraw yourself from the analysis and decision-making process of this tender.

Question



Alongside my work at EDPR I work for a Catalogue Sales company. Can I show the catalogue and make sales at the Company?

Answer

No, this is not allowed. No EDPR employee may engage in private professional activities during working hours. Second jobs are allowed when they do not imply a deterioration of the employee's professional performance, do not interfere with the employee's duties within EDPR and there is no risk of conflict of interest. Before starting a second job, employees should consult their line manager and inform HR and Ethics & Compliance.

Question



I want to go ahead with a financial stake in a company that is active in the same sector as EDPR. This participation seems to me a good investment opportunity to apply part of my savings. Can I proceed without worries?

Answer

Direct investment, or through relatives (spouses/cohabiting partners, and first-degree relatives or kin in a direct line and second-degree relatives or kin in a collateral line), in third parties related to EDPR, such as its competitors, may result in a situation of apparent, potential or real conflict of interest, especially when the functions performed within the EDPR Group correspond to those of a Decision Maker. You should report the situation to the Ethics & Compliance area so that the situation can be assessed.

Question



I am taking part in a recruitment process in which there is a person whose profile seems to me to be the most suitable for the job opening. This person happens to be a friend of mine. I am taking part in a recruitment process in which there is a person whose profile seems to me to be the most suitable for the job opening. This person happens to be a friend of mine. I would like to give my assent, but I'm afraid that this is, or might appear to be, a conflict of interest. Does conflict of interest only apply to family, or does it also cover these situations?

Answer

A conflict of interest may be caused by a family or friendship relationship; therefore, in this case you should let your line manager and the Ethics & Compliance area know about the situation and remove yourself from the decision-making process.

Examples

Question



Answer

My brother-in-law manages a company which is one of our suppliers and he wants me to intervene internally in the resolution of a dispute he has with EDPR. He says he is tired of trying to settle the matter over the phone and has no doubt that he is right. Should I step in?

No. to help your brother-in-law you can try to identify the problem internally, but you cannot promote its resolution or ask others to do so in a way that unjustifiably benefits your relative.

Question



Answer

A friend asked me to be his partner in a trading company that provides services to an EDPR Group company. He believes that the fact that I work at EDPR could be an important added value, because I have access to information that could prove to be a competitive advantage. Can I accept?

No, you shouldn't. Because this is a conflict of interest situation from the outset. You must inform Ethics & Compliance department and your line manager and follow the recommendations given.

Find out...



Related information

[Ethics & Compliance](#)

[Transactions with Related Parties Policy](#)

[Code of Conduct for Top Management and Senior Financial Officers](#)

[Code of Conduct for Suppliers](#)

[Internal area dedicated to Integrity](#)

[Procedure for Managing Claims](#)



We give everyone a voice

[Management](#)

[Ethics & Compliance Officer](#)

[Speak up Channel](#)

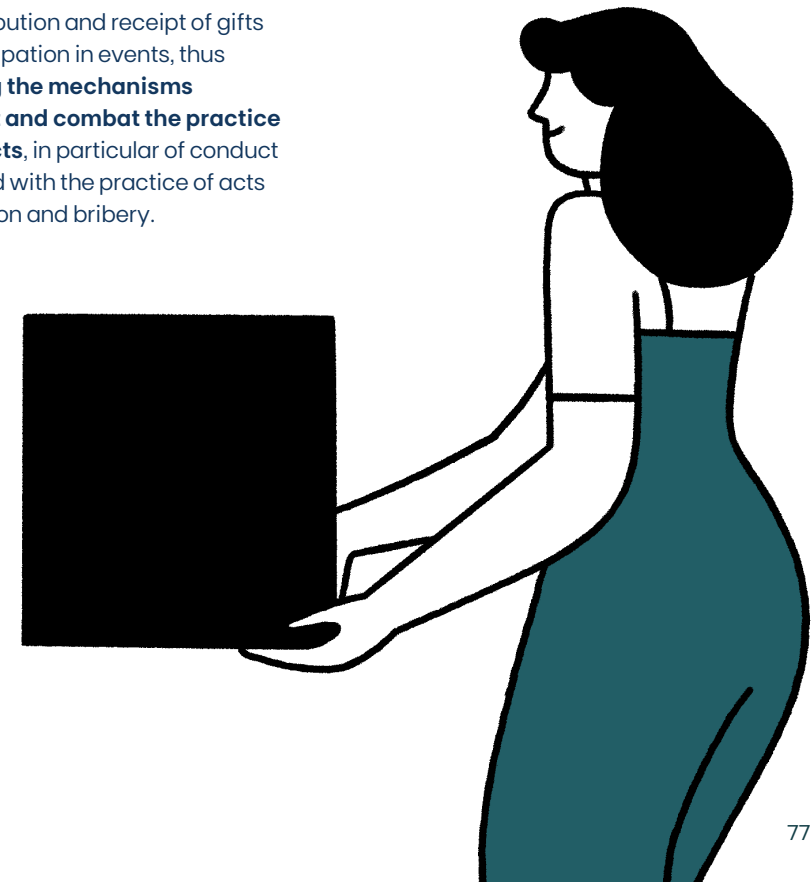
4.3 Gifts and Entertainment

The practice of offering gifts, hospitality and courtesies, as well as legitimate expenses of the Company, are an important and normal part of creating and maintaining business relations. They may, however, be applied to conceal corruptive conduct or the receipt or offer of undue advantages, so that the exchange of any material or non-material advantage may only occur in strict compliance with the applicable laws, policies and procedures, in a moderate manner and commensurate with the context.

Any offer must be transparent, socially appropriate according to custom and practice, **reasonable** in terms of professional courtesy, and **supported** by information circuits that transfer the power of decision regarding this practice to hierarchical superiors.

At EDPR **we neither offer nor receive gifts that may generate inappropriate perceptions** about business decisions or undue advantages.

EDPR has procedures that systematise the principles of action, the duties and the rules to be observed in the attribution and receipt of gifts and participation in events, thus reinforcing **the mechanisms to prevent and combat the practice of illicit acts**, in particular of conduct associated with the practice of acts of corruption and bribery.



We must

01. Make known, comply with and enforce internal regulations on receiving and offering benefits (e.g., gifts, meals and entertainment, travel and accommodation).

02. Record and justify, obtaining the necessary approvals from Senior Management, any gifts made and/or received which, due to their exceptional nature or because they exceed the limits internally defined in terms of value or frequency, may be considered an attempt to influence the obtaining of undue advantages.



03. Report through the appropriate channels any alarm signals, actions or omissions that may be associated with potential undue advantages, whether material or not.

04. Act in such a way that the external perception of our behaviour in this field is always transparent and unambiguous with regard to our integrity.

We must not

01. Give, accept or promise gifts, presents, loans, hotel stays, personal services or other benefits, even in the form of preferential treatment of customers, suppliers, government officials or any other person or entity related to the Company's business, which may result in an improper advantage for you or a third party.

02. Give, accept or promise any advantage, material or immaterial, when such advantages are not due.



Examples

Question



A supplier sent me an invitation to the private area (“VIP”) of an event for which entrance is not available to the general public. Can I accept, as this offer has no clear value attached?

Answer

This should be reported to your line manager. Can I accept, as this offer has no clear value attached? This is an offer that, for all intents and purposes, has a value associated with it. If its estimated value exceeds the defined limits, or if in doubt, this offer must be registered, the respective approval obtained from Top Management, and the area of Ethics & Compliance informed, in accordance with the internal procedures in force.

Question



We’re about to close a new deal with a foreign client. This transaction is important to meet the objectives of my department. The client’s manager is in town, so I thought it would be a good idea to offer him a weekend in the Algarve as a courtesy. Can I do this?

Answer

No. Offers to customers must be reasonable and never made when the parties are involved in negotiations, bidding or are about to enter into a contractual revision, as they may be associated with corrupt practices and/or obtaining undue advantages. The integrity of the contracting processes and EDPR’s reputation in the market are more important than any new contract.

Question



In my role I organise meetings, events and trips. Now one of the hotels we usually work with has offered me a weekend stay so my parents can celebrate their wedding anniversary. May I take you up on their kind offer?

Answer

No. Even if the benefit is to your family, accepting this offer would make it difficult for you to be impartial when organising future bookings for EDPR. You should politely decline and make clear why.

Find out...



Related information

- [Ethics & Compliance](#)
- [EDPR's Integrity Policy](#)
- [Social Investment Policy](#)
- [Code of Conduct for Top Management and Senior Financial Officers](#)
- [Code of Conduct for Suppliers](#)
- [Internal area dedicated to Integrity](#)
- [Procedure for Managing Claims](#)



We give everyone a voice

- Management
- Ethics & Compliance Area
- Ethics & Compliance Officer
- [Speak up Channel](#)

4.4 Money laundering and countering the financing of Terrorism

EDPR's work is guided by high ethical standards, business integrity and strict respect for and compliance with current legislation and regulations regarding the **prevention of money laundering and the financing of terrorism**. Accordingly, EDPR adopts the necessary procedures to know the identity of the relevant counterparties in the deals it intends to conclude and only concludes such deals if it identifies no signs of irregularities.

EDPR has a set of policies and procedures – included in the Programme for the Prevention of Money Laundering and the Fight against the Financing of Terrorism – which include measures aimed at responding to the legal duties and requirements associated with these matters, namely identification procedures – Know Your Counterparty (**KYC**) and due diligence – Integrity Due Diligence (**IDD**). Such policies and procedures establish concrete

measures that must be adopted to comply with all legal and regulatory obligations to which EDPR is bound, taking into consideration the different characteristics of the various business areas and the potential risk of money laundering and financing of terrorism.

To ensure the effective application of the **procedures** defined in this area, a governance model has been systematised and different roles and responsibilities have been defined to be respected in complying with the legal duties to which EDPR is bound.

EDPR's staff ensures the strictest compliance with both the **legislation** applicable to the different activities and jurisdictions in which we operate, and the internal procedures established on this matter, and they are subject to training that enables them to best perform the functions that are indispensable in this regard.



We must

01. Report all suspicious situations that may raise doubts as soon as possible, through the internally defined channels, and maintain strict confidentiality about them.

03. Review at appropriate intervals the counterparty's identification details and ensure that the funds involved continue to be lawfully sourced.

02. Identify and know, in accordance with applicable laws, policies and internal procedures, our counterparties, including their beneficial owners, before entering into any business or transaction, in order to ensure that we are working with reputable counterparties and that the source of funds is not criminal or otherwise illicit.

04. Only receive and make payments from and to entities previously subject to the internal procedures of identification - Know Your Counterparty (KYC) and due diligence - Integrity Due Diligence (IDD), and with whom we enter into contracts with adequate safeguards for integrity and prevention of money laundering, duly authorised under the corresponding internal procedures.



We must not

01. Enter into a business relationship or perform any transaction when the counterparty is suspected of being involved in money laundering or terrorist financing practices or any other illicit conduct.

03. Make payments without the proper authorisations and without prior knowledge of the counterparty and of the associated transactions.

02. Accept cash payments. However, when there is no other alternative, we must comply with the maximum amount authorised by law, and we must obtain prior authorisation from our superiors.

04. Invest, lend, contribute, partner, act or develop activities with or for the benefit of any person, entity or country subject to international sanctions.



Examples

Question



Answer

A counterpart is in a rush to close a contract, the return is huge. Can I ease the process?

No. Any contract must be scrutinised by internally instituted procedures, always complying with all pre-established steps. Any change to the process constitutes a breach of internal policies and procedures, with possible consequences for the employee or employees who do it and may also have a negative impact on EDPR's reputation or generate civil, criminal or administrative liability.

Question



Answer

I came across a business with a profitability far above normal. Should I report it?

Yes. Any business with profitability standards well above average must be scrutinised with the utmost thoroughness, complying with all internal procedures developed for this purpose.

Find out...



Related information

- [Ethics & Compliance](#)
- [EDPR's Integrity Policy](#)
- [Procedure for Managing Claims](#)



We give everyone a voice

- [Management](#)
- [Ethics & Compliance Officer](#)
- [Speak up Channel](#)

4.5 Privacy and Personal Data Protection

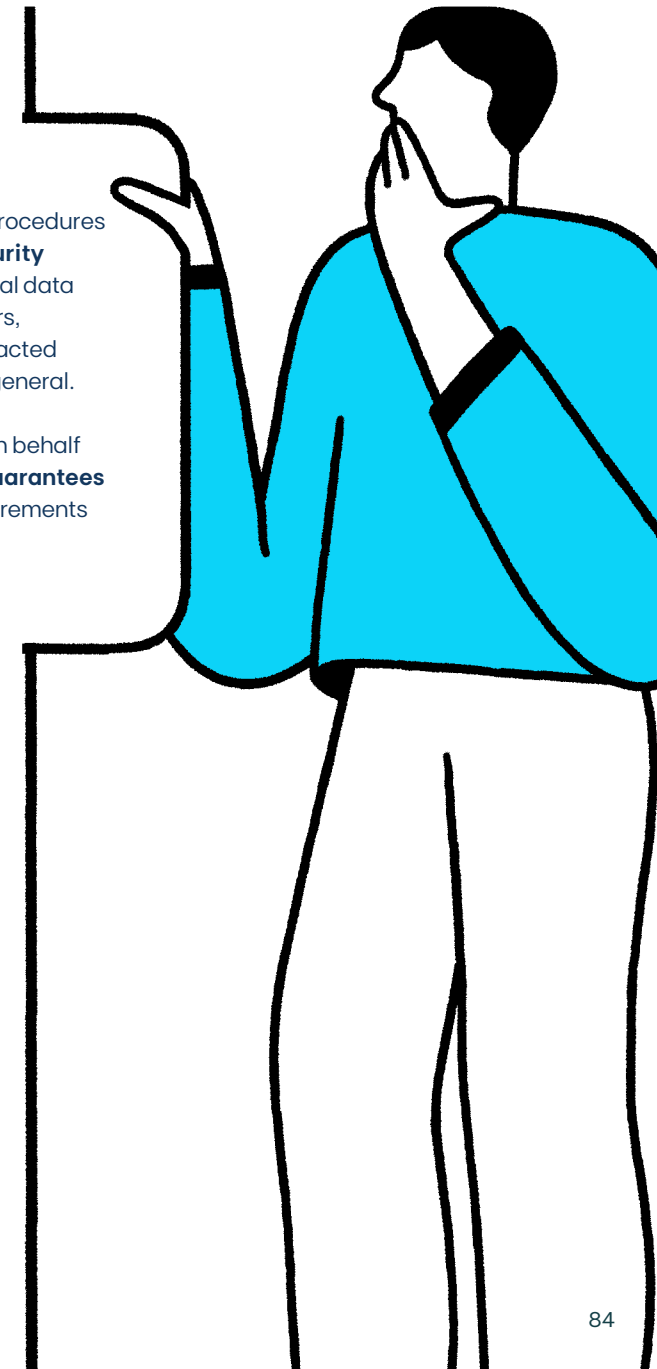
Privacy is a fundamental right.

Regarding the processing of personal data, data subjects have a set of specific rights aimed at ensuring **their privacy and the protection of their personal data**.

EDPR collects, processes and retains personal data to the extent strictly necessary for the achievement of its purposes.

EDPR relies on policies and procedures that ensure the **privacy, security and protection** of the personal data of all its employees, customers, suppliers and other subcontracted entities and stakeholders in general.

Suppliers authorised to act on behalf of EDPR must also provide **guarantees of compliance** with the requirements of privacy and protection of personal data.



We must

01. Adequate the processing of personal data to duly legitimised purposes and ensure that access to data is done on a “need-to-know” basis.

02. Respect the rights of rightsholders and ensure prompt response to requests for exercise of rights received.

03. Provide data subjects with all relevant information about the data processing carried out, including the purposes for which the data will be used.

04. Ensure that data processing and storage is carried out securely by applying appropriate technical and organisational measures.

05. Immediately and appropriately react in case of a breach of privacy and data protection, promptly reporting it to the Ethics & Compliance area.

06. Ensure that suppliers who carry out the processing of personal data on behalf of EDPR, comply with the rules of security and protection of personal data.



We must not

01. Use personal data without legitimate grounds for doing so.

02. Share personal data with third parties without the explicit consent of the data subject or other lawful basis.

03. Transfer personal data outside its country of origin without first obtaining advice from Ethics & Compliance.

04. Collect and process sensitive personal data such as health status, sexual orientation, political opinions, religion, racial origin, among others, outside the situations provided by law or without the explicit, free, informed and unequivocal consent of the holder.

05. Retain personal data of the holders for longer than is actually necessary.



Examples

Question



Answer

Our email distribution Service Provider has informed us that a significant number of emails to Customers have been sent to switched email addresses. I do not yet have information on what caused this error. Should I report it?

Yes. Whenever you become aware of an incident involving personal data and even if you do not yet have all the information on it, you should report it immediately to Ethics & Compliance.

Question



Answer

I know that one of our partners urgently needs to hire an accountant and I know that one of our local branches works with one who is a perfect match to the required profile. Can I provide their data to that partner?

No. The personal data we have access to shall not be processed for purposes other than the purpose for which it was collected, unless there is explicit consent of the data subject or other legal grounds for doing so.

Question



Answer

I am preparing a campaign for our staff, which includes gifts for personal use, and I think that it would be ideal to make the corresponding selection in an automated way, based on profiles and personal information. Can I do this?

No. Profiling and automated individual decision-making are only possible if there is explicit consent of the data subject or other legal grounds for doing so.

Question



Answer

I want to send a surprise birthday present to a colleague's house. I have asked the people management area to give me the address and they told me they can't do that because it would be "violating the colleague's right to privacy". As I think this is excessive, should I report it?

You should not report it. The answer you received is the correct one because we have to comply with the employee's right to protection and privacy of personal data, and its disclosure for purposes other than those that motivated its initial collection is not allowed.

Find out...



Related information

- [Ethics & Compliance](#)
- [Personal Data Protection Policy](#)
- [Privacy Notice for employees](#)
- Procedure for Managing Claims



We give everyone a voice

- Management
- Legal Advisory Department
- Ethics & Compliance Area
- EDPR Data Protection Officer (DPO) EDPR: dataprotection@edpr.com
- Ethics & Compliance Officer
- [Speak up Channel](#)

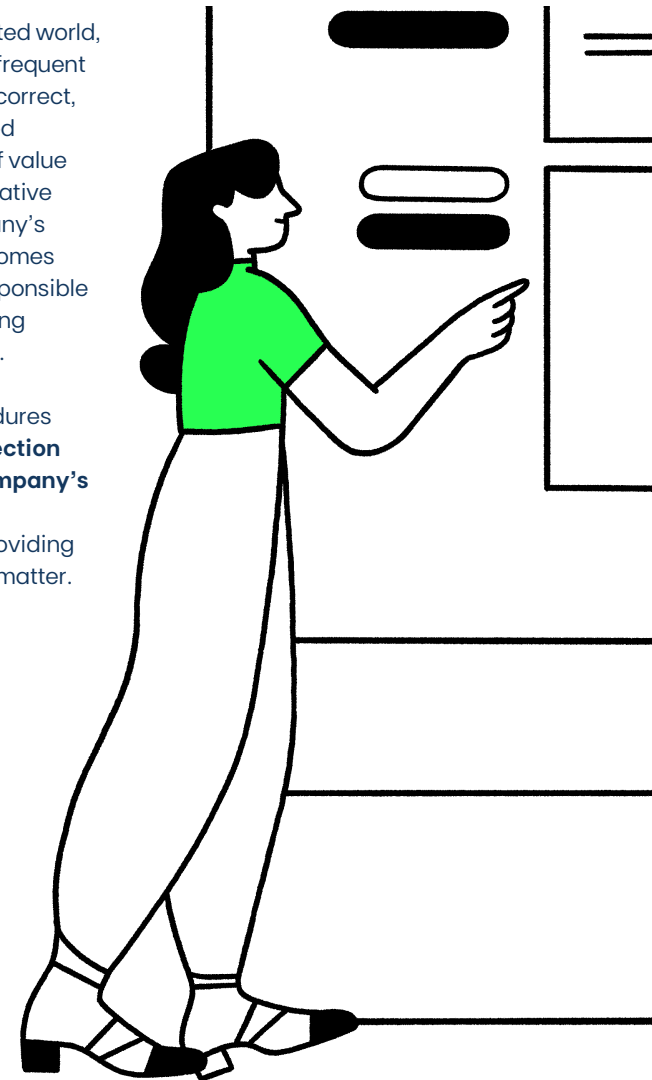
4.6 Use of Company Information

Information is a fundamental business resource, so it's appropriate and responsible management is not only vital to generate added advantages over the competition in terms of innovation, institutional image and competitiveness along the value chain, but also to reduce the risk of its misuse, whether intentional or not.

Therefore, since information is an essential part of EDPR's assets, we take care not only of its **confidentiality**, protecting it from disclosure to unauthorised persons, but also of its **integrity**, protecting it from undue alteration, and also of its availability, ensuring that it is accessible wherever and whenever it is needed.

In a permanently interconnected world, namely with the increasingly frequent use of social networks, any incorrect, inappropriate or wrongly timed information can lead to loss of value and generate substantial negative consequences for any company's image. At EDPR, this fact becomes even more relevant as it is responsible for managing and safeguarding critical energy infrastructures.

EDPR has policies and procedures that allow the adequate **protection and management of the Company's information** and that of its stakeholders in addition to providing training to employees on this matter.



We must

01. Keep all privileged, confidential and sensitive information secret at all times, communicating such information only to those who are legitimately entitled to it.

02. Whenever we are aware of facts that may have a relevant influence on stock market prices: i) maintain this information under strict confidentiality; and ii) abstain from trading in securities of EDPR companies, strategic partners or companies involved in transactions or relations with EDPR or financial instruments related to them. we must do so until their official disclosure.

03. Use the information to which we have access only for the purpose for which it was obtained, respecting the interests of the Company and of other parties.

04. Ensure the integrity of the information, protecting it against undue changes, during input, processing and respective result, which may cause the loss of its accuracy and/or coherence.

05. Ensure the availability of information so that it is accessible where and when needed.

06. Ensure the development of adequate technical and organisational security mechanisms, reinforcing the safeguarding of information confidentiality.

07. Protect confidential information by promoting a clean desk policy.

08. Update, in accordance with the internal policy, passwords for access to computer systems.

We must not

01. Retain and/or disclose any internal information after leaving EDPR, namely about the business, research and development, customers, related parties and employees.

02. Use internal Company information and/or information gathered from other stakeholders for personal benefit or for the benefit of third parties.

03. Discuss or work with confidential information in a public or even private area where confidentiality may be compromised.



Examples

Question



Answer

I was invited to teach at a University, and I think it would be interesting if my students could analyse EDPR's development strategy.
Can I discuss this in class?

Our development strategy is a fundamental piece of the Company's global strategy. As such, it must not be publicly presented without prior authorisation.

Question



Answer

I just found out today, overhearing a conversation between two directors, that the chances of a major project I'm working on being cancelled are high. No one has told me anything yet, but as my contract is up soon, I don't think it will be renewed.
Can I post on my LinkedIn page saying that I might be available soon to take up a new professional challenge, because the project I am working on might be cancelled?

As an employee, you have a duty of loyalty to EDPR and must not disclose information about its organisation, production methods or business. So, although you may be concerned, you cannot talk about the possibility of cancellation of the project you are working on to anyone, not least because it is a confidential matter that has not yet been publicly disclosed.

Find out...



Related information

[Information Security Policy](#)

[Procedure for Managing Claims](#)



We give everyone a voice

[Management](#)

[Ethics & Compliance Officer](#)

[Speak up Channel](#)

4.7 Use of Assets

The assets, whether tangible or intangible, of companies or third parties entrusted to us include the multiple and diverse resources that are made available to employees to carry out their daily work.

We have a duty to **protect and responsibly use the resources in our care**, including for example computers, vehicles, intellectual property and our own time, knowing that if misused or wasted, they adversely affect our individual and collective performance and therefore the value of the Company.

EDPR has policies and procedures that ensure **the management of its own property assets** and those of third parties entrusted to it, with a view to **safeguarding their value**.



We must

01.

Safeguard any assets, whether tangible or intangible, of EDPR or third parties, entrusted to us, including IT systems and intellectual and industrial property, even if produced by us, using them only for the fulfilment of business processes and ensuring their efficient use, avoiding their theft or loss.

02.

Use any and all IT resources (hardware, software, application systems, email, internet and LAN network) in accordance with EDPR's internal regulations.

03.

Respect inventions, intellectual works, models and industrial designs developed for the Company, and which are the exclusive property of EDPR.



We must not

01.

Use Company resources for personal purposes irresponsibly or without limitation. Limited and responsible use of communication tools (email, telephone, internet) may be acceptable as long as it does not interfere with our job responsibilities or with the requirements of applicable internal regulations.

02.

Use the assets of third parties (suppliers, partners, etc.) without the express authorisation of their owner.

03.

Use for personal reasons or share with third parties, technologies, methodologies, know-how and other information owned or entitled by EDPR, its customers or suppliers.

04.

Disclose software or any other content that may cause damage to the Company's assets or those of third parties.

05.

Sell or donate EDPR assets without proper authorisation.



Examples

Question



Answer

Can I take home a piece of Company equipment that nobody uses anymore and that I could use?

No. Even if the item is at the end of its useful life, it should not be made available to anyone without proper authorisation. Even if the item is at the end of its useful life, it should not be made available to anyone without proper authorisation. All goods belong to the Company's assets, regardless of their current use.

Question



Answer

I inadvertently destroyed a set of documents and afraid of what might happen to me, I chose not to tell anyone. Now, my line manager is asking me about these documents, saying that they were sent to EDPR, but that there is no record of their receipt. What should I do?

You will have to report that you unintentionally destroyed them and face the consequences. Not having reported the destruction of the documents at the time is serious, but not owning up to your mistakes, making it impossible to repair them and mitigate the consequences, is inadmissible.

Find out...



Related information

[Information Security Policy](#)

[Procedure for Managing Claims](#)



We give everyone a voice

[Management](#)

[Ethics & Compliance Officer](#)

[Speak up Channel](#)

Find out...

Organisational Tools and Corporate Governance of Ethics at EDPR

The Code of Ethics, presented above, is at the core of EDPR's corporate ethics policy.

The effective implementation of this policy requires the existence of a set of organisational instruments through which EDPR's board interacts with all stakeholders in order to achieve the desired ethical performance goals.

The main instruments at issue, which have been defined and established in the Company over the years, are:

- A Board of Directors (BoD)
- B EDPR Group's Ethics Commission (EC)
- C The Ethics & Compliance Officer
- D The Committee to which Corporate Governance matters are assigned
- E The Ethics & Compliance Global Unit includes a structure to support the Ethics & Compliance Officer

Organisational Tools and Corporate Governance of Ethics at EDPR

A. Board of Directors (BoD), with the following duties:

- (i) To approve the Regulation of the EDPR Ethics Commission, following the recommendation made by the Ethics Commission and after the opinion issued by the Committee to which Corporate Governance matters are assigned
- (ii) To approve the revisions of the Code of Ethics proposed by the Ethics Commission and on which the Committee to which Corporate Governance matters are assigned has issued an opinion.

B. EDPR Group's Ethics Commission (EC), with the following duties:

- (i) To establish the guidelines for compliance with the Code of Ethics
- (ii) To propose to the Board of Directors the multi-year ethics programmes and relevant annual plans drawn up by the Ethics & Compliance area.

(iii) To evaluate the quarterly Reports on the implementation of the Group's annual ethics plans, prepared by the Ethics & Compliance department or on other elements of ethical performance

(iv) To review cases of breaches to the Code of Ethics instructed by the Ethics & Compliance Officer and issue a binding opinion on them

(v) To issue recommendations, when requested by any of the boards of directors of the companies that form the EDPR Group, on the practices or codes of conduct within the scope of ethics or deontology, developed within the framework of specific legal or regulatory needs

(vi) To continuously ensure that the Code of Ethics and the procedures stemming from it are appropriate to the EDPR Group's needs and promoting revisions to the document, at least every two years, duly supported by a review report to be sent to the BoD for approval.

The composition of the Ethics Committee is disclosed on the EDPR website.

C. The Ethics & Compliance Officer, whose job it is:

(i) To be an independent, impartial listener, respecting confidentiality and anonymity, available to all those who seek assistance in helping to clarify any situations on allegedly ethical grounds, bearing in mind the framework of the provisions of the EDPR Code of Ethics

(ii) To receive the claims and to instruct, document and present the corresponding processes to the Ethics Commission

(iii) To regularly promote initiatives to improve procedures and practices to avoid future complaints and, above all, to promote behaviour that is more in line with EDPR's Code of Ethics

(iv) To prepare initiatives together with the Ethics & Compliance area to be included in the Compliance and Ethics Programs as well as in the Annual Plans

(v) To advise the Ethics Commission with regard to strengthening the consistency of the Group's Ethics policy

(vi) To annually report on the activity within the scope of their assigned functions

(vii) To annually review and update with all concerned areas, the procedure for managing potentially ethical contacts.

D. The Committee to which Corporate Governance matters are assigned, with the following duties in terms of Ethics, in accordance with the respective internal Regulations:

(i) To issue an appraisal on proposals submitted by the Ethics Commission with regards to the amendments of the Regulation of EDPR's Ethics Commission

(ii) To issue an appraisal on proposals submitted by the Ethics Commission with regards to the amendments of EDPR's Code of Ethics.

E. The Ethics & Compliance Global Unit includes a structure to support the Ethics & Compliance Officer function with the following duties:

(i) To coordinate the implementation of the hierarchically defined Ethics policy, strengthening the ethical culture within the Group

(ii) To prepare initiatives with the Ethics & Compliance Officer to be included in the Compliance and Ethics Programmes as well as in the Annual Plans

(iii) To draw up annual and quarterly reports on the Annual Ethics Plans

(iv) To support the Ethics & Compliance Officer in the implementation of the procedure for managing the contacts that he/she receives (where applicable).

Contact channels for allegedly ethical issues

Claimants' interaction with the EDPR Group on matters allegedly of an ethical nature may occur through the following Speak up Channel:

<https://www.EDPR.com/en/speak-up>



Glossary

Definitions of Stakeholders

EDPR: Set of companies that are in a controlling relationship with EDPR Renewables S.A..

Stakeholders: People, entities or groups that may affect or be affected by EDPR's activities, products or services and the performance associated with them, including, but not limited to, employees, shareholders, customers, suppliers, counterparties, business partners, competitors, public and regulatory authorities, patrons, and local communities.

Shareholders: Local or foreign natural or legal persons who own shares in EDPR Renewables, S.A..

Customers, Offtakers: Natural or legal persons to whom EDPR provides services or sells products to.

Employee: Persons that provides his/her professional activity to any of the companies of the EDPR Group, on a permanent or temporary basis, under an employment contract or professional internship contract, including similar situationsⁱ.

Communities: Civil society organisations, institutions and entities representing citizenship, customers, business segments, media, research institutes, promotion and social development organisations.

Competition: Situation in which independent companies sell similar products or services and compete with one another to attract customersⁱⁱ.

Suppliers: Individuals or entities that supply products or provide services to EDPR. This includes service providers. Including service providers.

Other Definitions

Environment: Natural environment in which an organisation operates, including the air, water, soil, natural resources, flora, fauna, people, external space and their interrelationshipsⁱⁱⁱ.

Money laundering: The goal of a large number of criminal acts is to generate a profit for the individual or group that carries out the act. Money laundering is the processing of these criminal proceeds to disguise their illegal origin. This process is of critical importance, as it enables the criminal to enjoy these profits without jeopardising their source. Illegal arms sales, smuggling, and the activities of organised crime, including for example drug trafficking and prostitution rings, can generate huge amounts of proceeds. Embezzlement, insider trading, bribery and computer fraud schemes can also produce large profits and create the incentive to "legitimise" the ill-gotten gains through money laundering. (Source: Financial Action Task Force on Money Laundering)ⁱ.

Supply Chain: Sequence of activities or partners which contribute with products or services to the organisation^{iv}.

Contributions to Political Parties:

Contribution or association of the EDPR brand to political parties, candidates, political campaign/ candidacy structures or related persons or entities, namely through the delivery of goods or the provision of services, directly or indirectly, on behalf of or in representation of EDPR.

Corruption: There are various kinds of corruption, but the following are the most relevant for the purposes of this Policy:

- Passive corruption (of a public official or holders of political office): the request, receipt or acceptance of the promise, directly or indirectly, of any undue advantages, for one's own benefit or for the benefit of a third party, of any act or omission contrary to the duties of his/her office, even if that act or omission precedes that request, receipt or acceptance of the promise;
- Active corruption (of a public official or holders of political office): The promise to deliver or the delivery, directly or indirectly, of undue

advantages, for one's own benefit or for the benefit of a third party, in order for a public official or politician doing any act or omission contrary to the duties of his/her office, even if that act or omission precedes the promise or delivery;

- Active corruption to the detriment of international trade: the promise to deliver or the delivery, directly or indirectly, of an undue advantage, to an official (national, foreign or of an international organization) or holder of political office (national or foreign) or a third party, with their knowledge, in order to obtain or retain business, a contract or other undue advantage in international trade;
- Passive corruption in the private sector: the request, receipt or acceptance of the promise, directly or indirectly, of any undue advantage, for one's own benefit or for that of a third party, or the promise thereof, for any act or omission by a private sector employee which constitutes a breach of his/her employment duties;
- Active corruption in the private sector: The promise to deliver or the delivery, directly or indirectly, of undue advantages, for one's own benefit or for the benefit of a third party, in order for a private sector

employee to perform or refrain from performing any act which constitutes a breach of his/her employment dutiesⁱ.

Bribery: Persuade or attempt to persuade another person, by means of a gift or a promise of a pecuniary or non pecuniary advantage, to give false statements, testimonies, expert opinions, etc., even when these are not realizedⁱ.

Complainant: A natural person who denounces or publicly discloses an infringement on the basis of information obtained in the course of their professional activity, regardless of the nature of that activity and the sector in which it is carried out. The following may be deemed to be whistleblowers:

- a) Employees in the private, social or public sector;
- b) Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction;
- c) Shareholders and persons belonging to administrative or management bodies or supervisory bodies of legal persons, including non-executive members;
- d) Volunteers and interns, paid or unpaid^{iv}.

Sustainable Development:

Development that meets the needs of the present without compromising the possibility for future generations to meet their own needs^v.

Donations: Cash or in kind contributions, granted without consideration that constitutes pecuniary or commercial obligations, to public or private entities whose activity consists predominantly of carrying out initiatives in the social, cultural, environmental, sporting or educational areasⁱ.

Sponsorship: Delivery in cash or in kind granted to public or private entities, in order to promote, namely, the company brand, image, activities or products of the entity that grants itⁱ.

Business Ecosystems: Network of organisations – including suppliers, distributors, customers, competitors, government agencies, etc. – involved in the delivery of a specific product or service through competition and cooperation. Each entity present in the ecosystem affects and is affected by the others, creating a constantly evolving relationship, in which flexibility and adaptability are determining characteristics.

“Extended” company: A company that carries out its activity relying not only on the provision of work and the knowledge of its employees, but also on the active collaboration of suppliers and partners in general and who are required, in turn, to undertake various commitments which include respect for the Code of Ethics, the Supplier Code of Conduct and other Policies and Codes of Conduct of the various business units of the parent company.

Entrepreneurship: Activity that involves the discovery, evaluation, and exploitation of opportunities to introduce new goods and services, ways of organising, markets, processes and raw materials through organising efforts that previously had not existed^{vi}.

Equity: The notion of having fair treatment and equal access to opportunities within an organisation or system, and the effort to identify and eliminate inequalities and barriers^{vii}.

Rule of law: Legal and political systems, structures and practices, which condition a government’s actions to protect the rights and freedoms of citizens, maintain law and order, and encourage the efficient functioning of a country^{iv}.

Family or family ties: Spouse or cohabiting partner, all relatives/ persons that permanently cohabit with the relevant person, relatives and the like in second degree, in the straight line or in the collateral line, their cohabiting partners, insofar as they do not benefit from the affinity status, and also the people who, in other legal systems, have similar positionsⁱ.

Confidential and sensitive information: Information and documentation not available to the public regarding the entire activity of the Company, particularly regarding the businesses, research and development, customers, related parties and employees.

Integrity: Behaviour and actions consistent with a set of moral and ethical principles and standards of conduct, adopted both by individuals and by institutions, which create a barrier against corruption^{iv}.

Assets: Multiple and diversified resources, tangible or intangible, of companies or third parties one is entrusted with, examples of which are: Company money; Company products; computer systems and software; phones; photocopiers; Company vehicles; working hours of employees and their respective work products; tickets to performances or sporting events; patented information; registered trademarks of the Company.

Precautionary Principle: Moral and political principle that determines that if an action can cause irreversible public or environmental damage, in the absence of an irrefutable scientific consensus, the burden of proof lies on the side of those who intend to perform the act or action that may cause the damage.

Its application in the area of the environment is mainly concerned with preventing possible harmful and irrecoverable effects, caused by actions that, although may not be scientifically and empirically proven to cause such damage, as a precaution, if there is no evidence of negative impacts, the action should not take place.

Retaliation: Reprisals or revengeⁱ.

International sanctions: Restrictive measures adopted by specific states, regional governments, any other entities, or multinational organizations under applicable foreign policies in pursuit of security objectives or others. Sanctions may have a trade, economic or financial nature and can target other states, specific individuals, institutions, entities or goods and servicesⁱ.

Transparency: Openness to decisions and activities which affect society, the economy and the environment and willingness to ensure one's communication in a clear, accurate, timely, honest and complete manner^{iv}.

- ⁱ EDPR Integrity Policy; 2023
- ⁱⁱ European Commission, EU Competition Policy and Consumers
- ⁱⁱⁱ NP ISO 26000 Guidance on Social Responsibility
- ^{iv} Law no. 93/2021 establishing the general protection regime for whistleblowers | [Law no. 93/2021 | DRE](#)
- ^v Report of the World Commission on Environment and Development: Our Common Future, United Nations
- ^{vi} Scott Shane, 2003
- ^{vii} DEIP Policy | Diversity, Equity, Inclusion and Sense of Belonging in the EDPR Group, 2022

Code of Ethics

Our Energy

