



Plan for the Prevention of Risks of Corruption and Related Infractions

EDP Group - Portugal

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I. Framework

Following the approval of the 2020-2024 National Anti-Corruption Strategy, the Decree-Law No 109-E/2021 was published on December 9th of 2021 in the Official Gazette, creating the National Anti-Corruption Mechanism ("MENAC") and approving the General Regime for the Prevention of Corruption ("RGPC").

In order to prevent, detect and sanction acts of corruption and related infractions, the RGPC establishes the obligation to adopt and implement a Regulatory Compliance Programme for public and private entities which must include, at least, the following elements: (i) a plan for the prevention of risks of corruption and related infractions; (ii) a code of conduct; (iii) a reporting channel (whistleblowing); and (iv) a training programme.

Based on EDP Group's commitment to ethics and integrity in all its businesses and partnerships, EDP has been defining and implementing mechanisms in this area through a Specific Compliance Programme, the Integrity/Anti-corruption Compliance Programme, applicable to the various Group companies. This programme reinforces the general principles of action and the duties of the group's companies, their employees and business partners, with regard to the prevention of unlawful acts, corruption practices or related infractions, defined and provided for in the EDP Group Integrity Policy.

Following the work developed over recent years in this area, EDP Energias de Portugal S.A. certified its Compliance Management System and its Integrity/Anti-corruption Compliance Programme by obtaining the ISO 37301 - Compliance Management Systems and ISO 37001 - Anti-corruption Management Systems certifications, issued by AENOR, an organisation accredited for this purpose.

EDP Group's Risks of Corruption and Related Infractions Prevention Plan (PPR) responds to the obligations set out in the RGPC, and also reflects the work that has been developed within the scope of the current System. Thus, the plan results from an analysis of the activities of EDP Group's companies, identifying the factors that may expose them to acts of corruption and related infractions, along with the existing control mechanisms for the mitigation of those risks.

II. EDP Group Characterization

1. EDP Group and its Context

EDP - Energias de Portugal (EDP Group) is a multinational vertically-integrated utility company that over the course of more than 40 years of history has consolidated its presence on the world energy scene, with a presence in more than 20 countries on 4 continents.

The EDP Group has over 12,000 employees and is active in the entire electricity value chain (generation, transmission, distribution and supply) and in gas supply. It is the fourth largest wind energy producer in the world and over 70% of the energy it produces is renewable. It supplies electricity and gas to more than 9 million customers.

The EDP Group has been listed on Euronext Lisbon since 1997, and EDP Brasil and EDP Renováveis are also listed on the stock exchange.



In Portugal, the EDP Group is active in the generation, distribution and supply of electricity and in gas supply.

EDP - Energias de Portugal, S.A., acts as a holding company with the mission of promoting, stimulating and managing enterprise and cross-cutting activities with a view to increasing and perfecting the performance of all its Group companies.

Although EDP Group's main concern is the development of business in the electricity and gas value chain, both traditional and renewable, other activities, namely support to the main business, are also carried out by subsidiaries of the holding company, which are mainly as follows: consulting services for the sector, insurance mediation (non-life products), technological innovation, venture capital, real estate, engineering works and health care.

Additionally, to support EDP Group's business, the Group also includes a shared services subsidiary for management, consultancy, administration, operation and intermediation, in the areas of general administrative support, accounting and finance, human resources and health and safety at work.

2. EDP's Commitments

EDP Group is committed to pursue its activity in strict compliance with the laws and regulations in force, together with the promotion of responsible action guided by the highest standards of ethics and integrity.

Compliance with national and international legislation, applicable to each EDP Group entity, as well as with internally approved regulations, is mandatory and the practice of any acts or omissions that constitute a breach or infringement of such regulations is not tolerated.

EDP Group enforces, therefore, a policy of zero tolerance with regard to any type of act that does not comply with the applicable legal and regulatory rules, and also guarantees its willingness to collaborate with the authorities with a view to eradicating such behaviour.

In this context, each EDP Group entity implements procedures to prevent and mitigate the risk of occurrence of criminal practices in its activities, such as acts of corruption, malfeasance, money laundering or insider trading. In parallel, these entities also adopt the procedures necessary to detect possible occurrences and report them to the competent authorities.

The EDP Group also adopts the procedures necessary to align its activities to the legal and regulatory standards in force in order to prevent the occurrence of any violation of the standards to which the respective entities and employees are bound, namely in matters of tender, bidding, data protection and the environment.

EDP has also committed to periodically, or immediately, when necessary, review and adapt its internal procedures and mechanisms, safeguarding their compliance with legal requirements and best market practices.

EDP Group companies only enter into and formalise legal transactions with third parties, partners and customers that comply with the legislation of the respective countries and international best practices, adopting procedures in accordance with the internal policies and standards of EDP Group, and that commit to social responsibility in their production chain. Any practices that may be perceived as constituting crimes, or that result in non-compliance with legal and regulatory norms and the rules of integrity to which the EDP Group is bound, are totally prohibited.

III. Plan for the Prevention of Risks of Corruption and Related Infractions

1. Scope

The Portuguese Criminal Code provides for the crime of corruption in the exercise of public functions (Articles 372 to 374-A), distinguishing the respective criminal framework according to the passive or active nature of the conduct, i.e. whether the act is committed by the person who corrupts or by the person who allows himself/herself to be corrupted. In addition to corruption in the public sector, separate legislation also provides for criminal liability for corruption offences committed in international trade and private matters.

In general, corruption can be defined as the use of power for purposes other than those for which it was granted, i.e., the use of a delegated power for private purposes.

There are also other crimes associated with corruption in criminal law which are equally damaging to the proper functioning of institutions and markets. Annex I of this PPR lists the legally stipulated crimes of corruption and related offences for which private sector legal persons may be criminally liable under Article 11 of the Criminal Code.

The RGPC is applicable to legal persons with registered offices in Portugal employing 50 or more workers and to branches in Portugal of legal persons with registered offices abroad employing 50 or more workers.

With this scope as a reference, the following EDP Group companies have been identified as entities covered by the RGPC:

- EDP - Energias de Portugal, S.A.;
- LABLEC – Estudos, Desenvolvimento e Actividades Laboratoriais, S.A.
- EDP Gestão Produção Energia, S.A.;
- TERGEN - Operação e Manutenção de Centrais Termoeléctricas, S.A.;
- E-Redes – Distribuição de Eletricidade, S.A.;
- EDP Comercial – Comercialização de Energia, S.A.
- SU Eletricidade, S.A.
- EDP Global Solutions - Gestão Integrada de Serviços, S.A.; and
- EDPR PT - Promoção e Operação, S.A.¹

Based on the entities referred to above, the areas of activity in which there may be a risk of corruption have been identified and are listed in Annex II of this document.

¹ As EDPR PT - Promoção e Operação, S.A., is integrated in EDP *Renewables*, its PPR is presented in a separate document.

2. Duties and Responsibilities

The responsibilities associated with the Integrity/Anti-Corruption Specific Compliance Programme, and consequently the Corruption Risk Prevention Plan, are based on the commitment of EDP Group's management boards, which set the tone at the top by promoting a culture of compliance.

As part of its commitment to the development, implementation and continuous improvement, EDP Group's Executive Board of Directors (EBD) approves and supports the implementation of the PPR, ensuring the integration of corruption prevention measures into business processes and promoting awareness of integrity issues. The management boards of the companies controlled by EDP Group in Portugal ensure the approval and implementation of the PPR within their entities, through specific procedures and corresponding oversight.

The General and Supervisory Board (GSB) and the Committee for Financial Matters/Audit Committee (CFM /AUDC) oversee, among other responsibilities, the risk culture related to Integrity, approving and ensuring the monitoring of the Compliance Department's Activity Plan.

The implementation of this Compliance Programme, and specifically, of the Plan for the Prevention of Risks of Corruption and Related Infractions, is also based on a set of responsibilities. These responsibilities are derived from the governance model adopted for Compliance Management purposes in the EDP Group, based on a system of three internal lines of defence, complemented by a fourth external line.

The 1st line of defence (Business) is, among others, responsible for the daily and proactive management of corruption and related infraction risks, in line with established regulations. The Top Management of each functional, Business or support Unit and all the Employees who form part of them are identified as those mainly responsible.

The 2nd line of defence (Compliance) is responsible for ensuring the support of the business in identifying, analysing, assessing, mitigating and monitoring risk, as well as challenging and questioning the potential risks that may arise. EDP Group's Compliance Department in Portugal and the Regulatory Compliance Officer are the main responsible bodies.

Within this scope, EDP Group's Compliance Department in Portugal is specifically responsible for:

- The identification, analysis and classification of risks and situations that may expose the organisation to acts of corruption and related infractions, in coordination with the relevant areas and Business Units;
- The identification of preventive and corrective measures to reduce the potential for such occurrences and the impact of the risks and situations identified, in coordination with the relevant areas and Business Units;
- The promotion and coordination of the implementation, maintenance and monitoring of the Integrity Compliance / Corruption Prevention Programme;
- The provision of advice and methodological support to the other Compliance management players, including the agents and the Heads of the Business Units;

- Establishing the framework for collaborative relations and coordination between the various actors;
- Monitoring and reporting to the Executive Board of Directors on the implementation and operation of the Compliance Programme, including any non-compliances;
- Promoting employee awareness and training;
- Promoting the development, maintenance and implementation of draft guidelines and procedures;
- Monitoring the progress of internal / external integrity audits;
- Promoting the implementation of an information / documentation system for the Compliance Programme;
- Monitoring compliance mechanisms, namely the third-party Integrity Due Diligence process and the assessment of corruption risks.

The Regulatory Compliance Officer shall be responsible for ensuring and monitoring the implementation of the regulatory compliance programme relating to the RGPC.

The Compliance Department and the party responsible for regulatory compliance are supported by the legal department (General Secretariat and Legal Department), which monitors the relevant legislative changes, provides legal advice on the interpretation and evaluation of the respective impacts on activities, and informs the areas affected and the Compliance Department.

To support and implement this Plan and the Integrity / Anti-Corruption Compliance Programme, designated agents have been appointed in each Business Unit in Portugal. As business specialists in the EDP Group companies, these agents provide support to its areas of business in the implementation of the Compliance Department's approved procedures and guidelines and then report any non-compliance.

The 3rd line of defence (Internal Audit) is, among other things, responsible for carrying out independent audits of the Compliance Management System. These audits may also be carried out by external, independent bodies with recognized credentials for the purpose.

The 4th line of defence (External Audit) is responsible for carrying out independent audits of the Compliance Management System.

In this line of defence, tests are also carried out on the mechanisms/controls that are considered in the Plan for the Prevention of Risks of Corruption and Related Infractions, both on the entity level controls and the process level controls. The control mechanisms that are considered key for risk mitigation are tested and evaluated on an annual basis, while the remaining ones are tested and evaluated on a rotating basis over a three-year period.

3. Risk management and assessment methodology

3.1. Risk identification and analysis

This Plan for the Prevention of Risks of Corruption and Related Infractions follows the following methodology:

1. Identification of risks and risk factors associated with critical processes in the area of corruption and related infractions;
2. Evaluation of the risks according to a scale of low (L), medium (M) or high (H) risk, depending on the probability of occurrence and the degree of impact, and subsequent attribution of an overall risk level (inherent risk);
3. Identification and implementation of preventive/oversight measures to avoid or minimise the probability of occurrence and the degree of impact of the risks (residual risk assessment); and
4. Monitoring and controlling risks, implementing corrective measures when necessary.

In the first stage of risk identification, in addition to determining the offences for which private sector legal persons may be held criminally liable, risk factors are also defined. They correspond to the conditions or circumstances that may lead to the perpetration of illicit acts within the scope of each of the areas of activity.

The following are identified as risk factors associated with the EDP Group companies' main activities, located in Portugal, that may involve the risk of possible non-compliance with legislation on the crime of corruption and related infractions:

- Relationship with public officials and/or politically exposed persons;
- Attribution of sponsorships and donations;
- Acceptance of gifts and invitations to events;
- Attribution of gifts and invitations to events;
- Access to funds;
- Involvement with sanctioned countries;
- Business relations with natural or legal persons from countries with high levels of corruption;
- Negotiating/Contracting with private third parties (conflicts of interest);
- Access to commercially sensitive information / privileged or confidential information;
- Undue employee advantage;
- Involvement with third parties associated with corruption/integrity risk situations; and
- Intervention in court proceedings.

The assessment of the applicability of risks and risk factors in each area of activity is based on an analysis of the context of the organization. This analysis includes the identification of internal and external factors that may affect the organization's ability to achieve the objectives of the Specific Integrity/Anti-Corruption Compliance Program. The assessment of applicability is also based on national and international best practices and recommendations.

In the second phase of the process, an analysis is carried out on the identified risk factor, taking into consideration the activity in which it was found.

The risk factor is assessed according to the following criteria:

- a. **Probability of occurrence:** assessment of the frequency with which non-compliance within the organisation occurs or is likely to occur;
- b. **Impact:** potential economic, operational and reputational impacts are assessed.

- **Economic impact:** effect of regulatory non-compliance risk in monetary terms, being mainly related to potential financial penalties.
- **Operational impact:** effect of regulatory non-compliance risk on the continuity of operations. It may affect specific processes or even the maintenance of certain businesses.
- **Reputational impact:** effect of regulatory non-compliance risk on the continuity of operations.

Based on the impact that each risk factor has, as well as on the respective probability of occurrence, the aggregated risk assessment is carried out (inherent risk).

3.2. Control mechanisms

EDP plans and implements its Integrity/Anti-Corruption Compliance Programme through the implementation of control mechanisms, which include:

- Establishment of procedures and norms that describe the integrity/anti-corruption guidelines, details of the operational processes and respective controls, as well as the necessary resources;
- Monitoring and measurement (where applicable) of indicators relating to the Integrity/Anti-Corruption Compliance Programme;
- Definition and maintenance of documented information to ensure that processes and related controls are conducted as planned and are in accordance with the requirements of the Integrity/Anti-Corruption Compliance Programme.

For all risks of corruption and related infractions identified in the analysis of the organization and provided for in this Plan, preventive measures have been implemented, and are being executed, in order to reduce their probability of occurrence and degree of impact.

These measures are distinguished between entity level controls (code of conduct, standards, policies and other transversal mechanisms) and process level controls (processes and procedures at operational level).

The transversal entity level controls, that is, those capable of mitigating any risk factor of corruption or related infractions, are framed by a set of documents (codes, standards, policies) in which the fundamental principles in matters of compliance associated with integrity are set out:

- i. Code of Ethics of EDP Group;
- ii. Code of Conduct for Senior Management and Senior Financial Officers,
- iii. Compliance Standard;
- iv. Specific Integrity Compliance Programme.
- v. EDP Group Integrity Policy;
- vi. EDP Group *Compliance Guidelines*; and
- vii. Irregularities reporting channel (*Whistleblowing*).

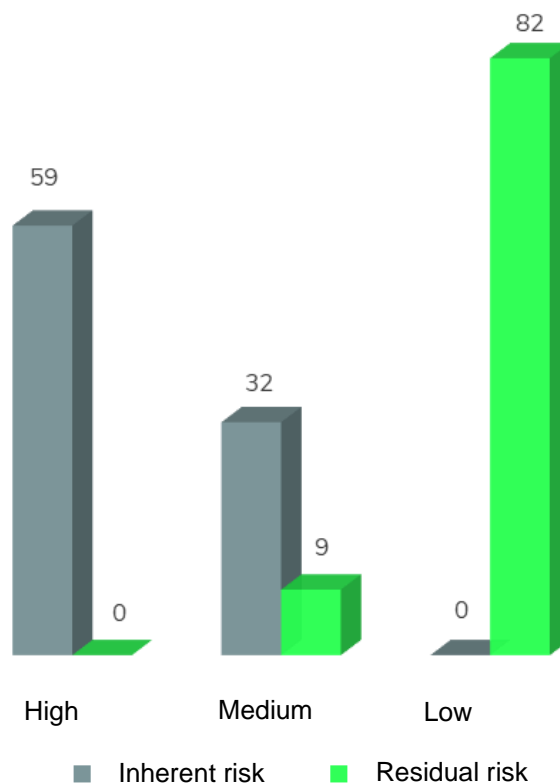
The operational preventive measures (process level controls) associated with the mitigation of each risk factor are listed in Annex III.

Following the identification and implementation of preventive measures, the residual risk level of each risk factor is assessed, that is, the risk that persists after the implementation of controls. This evaluation considers, on the one hand, the attributes of these controls, as well as the evaluation of their effectiveness. If the result of the last assessment carried out determines that any of the controls are not adequate/effective, these will not be considered for the purpose of risk mitigation and, consequently, in the assessment of residual risk.

3.3. Risk assessment results

The current risks and controls matrix, available in Annex IV of this document, contains a total of 91 risk factors distributed among the different areas of activity, analysed in terms of their probability of occurrence (PO), degree of impact (DI), inherent risk level (RL) and residual risk.

The graph below shows the evaluation and classification of inherent risk of each risk factor within each area of activity. 59 factors were identified with a high risk and 32 with a medium risk level. With the implementation of the control mechanisms, it was possible to reduce the various risk factors to acceptable levels. 90% of residual risks are low, with the maximum residual risk having reached a medium level, as illustrated in the graph below:



Graph 1 - Comparison of inherent and residual risk

The most relevant risk factors with medium residual risk are detailed in the table below:

Risk factor	Risk	Area of activity
Negotiating/Contracting with private third parties (conflicts of interest)	Passive corruption (Private sector)	Purchases (Energy/Raw Materials)
Access to commercially sensitive information / privileged or confidential information	Passive corruption (Private sector)	Purchases (Energy/Raw Materials)
		Business Analysis and Partnerships/Investments/M&A
Involvement with third parties associated with corruption risk situations	Passive corruption (Private sector)	Purchases (Energy/Raw Materials)
Attribution of gifts and invitations to events	Active corruption (Private sector)	Partnerships, Donations and Sponsorship
Relationship with public officials and/or politically exposed persons	Active corruption (Private sector)	Business Analysis and Partnerships/Investments/M&A
		Partnerships, Donations and Sponsorship
		Generation hubs/centres /Energy generation management
		Electricity distribution networks management

Table 1 - Average residual risks

The medium residual risk is mitigated through the reinforcement of several Compliance mechanisms in a continuous improvement strategy, namely through a reinforced monitoring of the implemented control measures, as well as through awareness and training.

Given the preventive mechanisms currently implemented and executed, no need for additional mitigation mechanisms has been identified.

IV. Monitoring

The monitoring of the Integrity/Anti-Corruption Compliance Programme is ensured under the terms envisaged in the Governance Model, namely through:

- Documentation, periodic review of oversights, and implementation and recording of evidence of their execution;
- Monitoring the development of the Programme and reporting on the implementation and development of the respective initiatives;
- Consolidation and internal reporting of information on the progress of the Programme's implementation, covering in particular: (i) analysis of relevant risks; (ii) implementation of controls; (iii) situations of non-compliance; (iv) the results of evaluations/audits of the Programme carried out by the Internal Audit Department or by a specialised external entity contracted for this purpose, and (v) the degree of implementation of improvement opportunities that have been identified;
- Periodic evaluation of improvement opportunities.

Additionally, the execution of the PPR is subject to control, carried out as follows:

- a) Drafting, in October, of an interim evaluation report on situations of high or maximum risk;
- b) Drafting, in April the following year, of an annual evaluation report containing, namely, the progress of identified preventive and corrective measures, as well as the results of monitoring their effective implementation.

The PPR is reviewed every three years or whenever a change occurs in the responsibilities, or in the organic or corporate structure of the entity, that justifies the review of any of its elements.

V. Final Provisions

EDP Group employees are informed of the PPR and the mid-term and annual evaluation reports, through the intranet and the official EDP page on the Internet, within 10 days of their implementation and respective revisions or preparation.

VI. Annexes

1. Annex I

Applicable crimes/infractions	Legal document/Risk	Legal provision
Corruption and related offences in the public sector	Active corruption (p.&p. in art. 374. of the Criminal Code)	<p>"1 - Whoever, by themselves or through an intermediary, with consent or ratification, gives or promises to a civil servant, or to a third party by request or with their knowledge, a tangible or intangible advantage for the purposes set out in Article 373, paragraph 1, shall be punished by imprisonment of between one and five years.</p> <p>2 - If the purpose is that indicated in Article 373, paragraph 2, the perpetrator shall be punished with a prison sentence of up to three years or with a fine of up to 360 days.</p> <p>3 - The attempt is punishable."</p>
	Influence peddling (p.&p. in art. 335 of the Criminal Code)	<p>"1 - Whoever, by themselves or through an intermediary, with consent or ratification, requests or accepts, for themselves or a third party, a tangible or intangible advantage, or the promise thereof, in order to abuse their real or supposed influence with any public entity, shall be punished:</p> <p>a) With a penalty of imprisonment from 1 to 5 years, if a more serious penalty is not applicable under any other legal provision, if the purpose is to obtain a favourable unlawful decision;</p> <p>b) With a penalty of imprisonment up to 3 years or a fine, if a more serious penalty is not applicable under any other legal provision, if the purpose is to obtain a favourable unlawful decision;</p> <p>2 - Whoever, by themselves or through an intermediary, with their consent or ratification, gives or promises a tangible or intangible advantage to the persons referred to in the preceding paragraph for the purposes set out in subparagraph a), shall be punished by imprisonment for up to three years or a fine."</p>
	Receipt of undue advantages (p.&p. in art. 372 of the Criminal Code)	<p>2 - Whoever, by themselves or through an intermediary, with their consent or ratification, gives or promises to a civil servant, or to a third party indicated or known by him, a tangible or intangible advantage that is not due to them, in the performance of their functions or because of them, shall be punished with a prison sentence of up to three years or with a fine of up to 360 days.</p>
Corruption and related offences in the private sector	Active corruption with prejudice to international trade (p.&p. in art. 7 of Law No. 20/2008, of April 21)	<p>"Whoever by themselves or, through their consent or ratification, through an intermediary person gives or promises to a national, foreign or international organisation official, or to a national or foreign political office holder, or to a third party close to them, a tangible or intangible advantage, which is not due to them, in order to obtain or retain a business, a contract or another undue advantage in international trade, shall be punished by imprisonment of one to eight years."</p>
	Passive corruption (p.&p. in art. 8 of Law No. 20/2008, of April 21)	<p>"1 - A private sector employee who, by themselves or, through their consent or ratification, through an intermediary, requests or accepts, for themselves or for a third party, undue tangible or intangible advantage, or the promise thereof, for any act or omission that constitutes a violation of their functional duties, shall be punished with a prison sentence of up to five years or with a fine of up to 600 days.</p> <p>2 - If the act or omission foreseen in the previous paragraph is capable of causing a distortion of competition or a patrimonial damage to third parties, the perpetrator shall be punished with a prison sentence of between one and eight years."</p>

Applicable crimes/infractions	Legal document/Risk	Legal provision
	<p>Active corruption (p.&p. in art. 9 of Law No. 20/2008, of April 21)</p>	<p>"1 - Whoever, by themselves or through their consent or ratification, through an intermediary, gives or promises to the person referred to in the previous article, or to a third party with their knowledge, a tangible or intangible advantage that is not due to them, in order to pursue the purpose indicated therein, shall be punished with a prison sentence of up to three years or with a fine.</p> <p>2 - If the conduct envisaged in the preceding paragraph aims at obtaining or is capable of causing a distortion of competition or monetary damage to third parties, the agent shall be punished with a prison sentence of up to five years or with a fine of up to 600 days.</p> <p>3 - The attempt is punishable."</p>
<p>Bribery</p>	<p>Bribery (p.&p. in art. 363 of the Criminal Code)</p>	<p>"Whoever persuades or attempts to persuade another person, through the giving or promising of a tangible or intangible advantage, to commit the facts provided for in Articles 359 or 360 (False testimony or statement and Falsity of testimony, expertise, interpretation or translation, respectively), without their being successfully committed, shall be punished by imprisonment of up to 2 years or a fine of up to 240 days."</p>
<p>Illegal financing of political parties</p>	<p>Illegal financing of political parties (p.&p. in article 8 and 29 of Law no. 19/2003, of 20 June)</p>	<p>Art.8.^o "1 - Political parties may not receive anonymous donations nor may they receive donations or loans of a monetary nature or in kind from national or foreign legal persons, except as provided for in the following paragraph."</p> <p>Art. 29. "4 - Legal entities that violate the provisions regarding chapter ii (Financing of political parties) shall be punished with a minimum fine equivalent to double the amount of the prohibited donation and a maximum fine equivalent to five times that amount."</p>

2. Annex II

Area of activity	Entities covered by the EDP Group
Purchases (Goods/Services)	Throughout the Group's companies in Portugal
Purchases (Energy/Raw Materials)	EDP - Energias de Portugal, S.A.
	EDP Gestão Produção Energia, S.A.
	EDP Comercial – Comercialização de Energia, S.A.
	SU ELETRICIDADE, S.A.
Treasury Management	Throughout the Group's companies in Portugal
Business Analysis and Partnerships/Investments/M&A	Throughout the Group's companies in Portugal
Financial Reporting and Taxation	Throughout the Group's companies in Portugal
Financial Management	Throughout the Group's companies in Portugal
Investor Relations	EDP - Energias de Portugal, S.A.
HR Management	Throughout the Group's companies in Portugal
Partnerships, Donations and Sponsorship	Throughout the Group's companies in Portugal
Judicial	Throughout the Group's companies in Portugal
Regulation	Throughout the Group's companies in Portugal
Provision of technical and laboratory services	LABELEC – Estudos, Desenvolvimento e Actividades Laboratoriais, S.A.
Generation hubs/centres/Energy generationmanagement	EDP Gestão Produção Energia, S.A.
	TERGEN - Operação e Manutenção de Centrais Termoeléctricas, S.A.
Electricity distribution networks Management	E-Redes – Distribuição de Eletricidade, S.A.
Consumption Data and Meter Readings Management	
Sales/Marketing of energy and services in the free market	EDP Comercial – Comercialização de Energia, S.A.
Energy trading on the regulated market	SU Eletricidade, S.A.
Property Asset Management	EDP Global Solutions - Gestão Integrada de Serviços, S.A.
	Throughout the Group's companies in Portugal
Energy trading	EDP - Energias de Portugal, S.A.
	EDP Gestão Produção Energia, S.A.
	EDP Comercial – Comercialização de Energia, S.A.
	SU ELETRICIDADE, S.A.
Management of corporate insurance programmes	Throughout the Group's companies in Portugal

3. Annex III

Risk Factor	Preventive and Corrective Measures.
Relationship with public officials and/or politically exposed persons	<ul style="list-style-type: none"> • Ensure compliance with the Procedure for Relations with Public Agents and Politically Exposed Persons, and the Prevention and Management of Conflicts of Interest: <ul style="list-style-type: none"> • Report all interactions with Public Officials and Politically Exposed Persons • Annual signing of a Declaration of absence of conflict of interests by the decision-makers and employees classified as Politically Exposed Persons; • Conflict of interest analysis of politically exposed persons (PEP), acquaintances or persons closely associated with PEPs - Employees and prospective employees.
Involvement with third parties associated with corruption/integrity risk situations	<ul style="list-style-type: none"> • Third parties with whom a business relationship is to be established with an EDP Group entity (with the exceptions defined in the respective procedure), are subject to an <i>Integrity Due Diligence</i> process and adaptation of the contract to the recommendations issued in the Integrity Due Diligence (IDD) Report.
Attribution of gifts and invitations to events	<ul style="list-style-type: none"> • The giving of gifts or invitations to events is subject to an approval process by Senior Management whenever certain reference limits are exceeded.
Acceptance of gifts and invitations to events	<ul style="list-style-type: none"> • The receiving of gifts or invitations to events is subject to an approval process by Senior Management whenever certain reference limits are exceeded.
Attribution of sponsorships and donations	<ul style="list-style-type: none"> • Analysis of risk in matters of integrity, with a final rating opinion of the potential recipient of the donation or sponsorship. Subsequent inclusion / adaptation of specific clauses that mitigate the identified risk(s), namely accountability, monitoring and compliance. • Ongoing monitoring of the effectiveness of donations and sponsorship, in order to verify that the implementation of the projects/actions carried out meets the objectives of the protocol/contract signed.
Access to funds	<ul style="list-style-type: none"> • Internal Control System for Financial Reporting, consisting of a consolidated matrix of risks and oversights for the relevant processes and Business Units, detailing the risks that affect the preparation of financial information and the oversights that mitigate them.
Involvement with sanctioned countries	<ul style="list-style-type: none"> • Third parties with whom a business relationship is to be established with an EDP Group entity (with the exceptions defined in the respective procedure), are subject to an <i>Integrity Due Diligence</i> process and adaptation of the contract to the recommendations issued in the Integrity Due Diligence (IDD) Report. • In accordance with the internally defined rules, EDP Group companies do not deal with sanctioned persons, entities or countries.
Business relations with natural/legal persons from countries with high levels of corruption	<ul style="list-style-type: none"> • Third parties with whom a business relationship is to be established with an EDP Group entity (with the exceptions defined in the respective procedure), are subject to an <i>Integrity Due Diligence</i> process and adaptation of the contract to the recommendations issued in the Integrity Due Diligence (IDD) Report.
Negotiating/Contracting with private third parties (conflicts of interest)	<ul style="list-style-type: none"> • Ensure compliance with the Procedure for the Prevention and Management of Conflicts of Interest: <ul style="list-style-type: none"> • The members of the management bodies of companies/controlled entities and all Employees must inform the Compliance Department of any apparent, potential or real situation of Conflict of Interest in which they find themselves. The

Risk Factor	Preventive and Corrective Measures.
	<p>Compliance Department prepares an opinion on this report with appropriate recommendations.</p> <ul style="list-style-type: none"> • Annual signing of a Declaration of absence of conflict of interests by those decision-makers and employees classified as Politically Exposed Persons before the hiring process starts; • Third parties with whom a business relationship is to be established with an EDP Group entity (with the exceptions defined in the respective procedure), are subject to an Integrity Due Diligence process and adaptation of the contract to the recommendations issued in the Integrity Due Diligence (IDD) Report. • Set of oversight mechanisms implemented in the purchasing process. • Set of oversight mechanisms associated with the selection of lawyers.
Access to commercially sensitive information / privileged or confidential information	<ul style="list-style-type: none"> • Internal Control System for Financial Reporting, consisting of a consolidated matrix of risks and oversights for the relevant processes and Business Units, detailing the risks that affect the preparation of financial information and the oversights that mitigate them.
Undue employee advantage (conflict of interest)	<ul style="list-style-type: none"> • Set of oversight mechanisms associated to the recruitment process and internal mobility, namely several screening phases and interviews with different agents.
Intervention in court proceedings	<ul style="list-style-type: none"> • Validation phases associated with the selection of lawyers/law firms, and Integrity <i>Due Diligence</i> review procedure.

4. Annex IV

Area of activity	Risk	Risk Factor	Inherent Risk Assessment			Residual Risk	
			PO	ID	RL		
Purchases (Goods/Services)	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	L	H	M	L	
	Active corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	L	M	M	L	
		Involvement with third parties associated with corruption/integrity risk situations	L	M	M	L	
		Relationship with public officials and/or politically exposed persons	L	H	M	L	
	Passive corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	M	H	H	L	
		Access to commercially sensitive information / privileged or confidential information	H	M	H	L	
		Involvement with third parties associated with corruption/integrity risk situations	H	M	H	L	
		Relationship with public officials and/or politically exposed persons	M	H	H	L	
	Illegal financing of political parties	Negotiating/Contracting with private third parties (conflicts of interest)	L	M	M	L	
		Relationship with public officials and/or politically exposed persons	L	M	M	L	
	Purchases (Energy/Raw Materials)	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	M	H	H	L
			Involvement with sanctioned countries	M	H	H	L
Business relations with natural/collective persons from countries with high levels of corruption			M	H	H	L	
Active corruption (private sector)		Negotiating/Contracting with private third parties (conflicts of interest)	M	H	H	L	
		Relationship with public officials and/or politically exposed persons	M	H	H	L	
		Involvement with sanctioned countries:	M	H	H	L	
		Business relations with natural/collective persons from countries with high levels of corruption	M	H	H	L	
		Involvement with third parties associated with corruption/integrity risk situations	M	H	H	L	

Area of activity	Risk	Risk Factor	Inherent Risk Assessment			Residual Risk
			PO	ID	RL	
	Passive corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	M	H	H	M
		Access to commercially sensitive information / privileged or confidential information:	H	H	H	M
		Involvement with third parties associated with corruption/integrity risk situations	M	H	H	M
		Involvement with sanctioned countries	M	H	H	L
		Business relations with natural/collective persons from countries with high levels of corruption	M	H	H	L
Treasury Management	Active corruption (public sector)	Access to funds	H	H	H	L
	Active corruption (private sector)	Access to funds	H	H	H	L
	Passive corruption (private sector)	Access to commercially sensitive information / privileged or confidential information	L	H	M	L
Business Analysis and Partnerships/Investments/M&A	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	M	H	H	M
		Involvement with sanctioned countries	M	H	H	L
		Business relations with natural/collective persons from countries with high levels of corruption	M	H	H	L
	Active corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	M	H	H	L
		Relationship with public officials and/or politically exposed persons	M	H	H	L
		Involvement with sanctioned countries	M	H	H	L
		Business relations with natural/collective persons from countries with high levels of corruption	M	H	H	L
		Involvement with third parties associated with corruption/integrity risk situations	M	H	H	L
	Passive corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	M	H	H	L
		Access to commercially sensitive information / privileged or confidential information	H	H	H	M
		Involvement with third parties associated with	M	H	H	L

Area of activity	Risk	Risk Factor	Inherent Risk Assessment			Residual Risk
			PO	ID	RL	
		corruption/integrity risk situations				
		Involvement with sanctioned countries	M	H	H	L
		Business relations with natural/collective persons from countries with high levels of corruption	M	H	H	L
Financial Reporting and Taxation	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	L	H	M	L
	Passive corruption (private sector)	Access to commercially sensitive information / privileged or confidential information	H	H	H	L
Financial Management	Passive corruption (private sector)	Access to commercially sensitive information / privileged or confidential information	L	M	M	L
	Active corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	L	H	M	L
		Relationship with public officials and/or politically exposed persons	L	H	M	L
Investor Relations	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	L	H	M	L
	Passive corruption (private sector)	Access to commercially sensitive information / privileged or confidential information	H	M	H	L
HR Management	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	L	H	M	L
	Passive corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	L	H	M	L
		Relationship with public officials and/or politically exposed persons	L	H	M	L
		Undue employee advantage (conflict of interest)	M	M	M	L
Partnerships, Donations and Sponsorship	Active corruption (public sector)	Attribution of sponsorships and donations	M	H	H	L
		Attribution of gifts and invitations to events	M	H	H	L
	Active corruption (private sector)	Attribution of sponsorships and donations	M	H	H	L
		Attribution of gifts and invitations to events	M	H	H	M
		Relationship with public officials and/or politically exposed persons	M	H	H	M
		Involvement with third parties associated with corruption/integrity risk situations	M	H	H	L
	Passive corruption	Acceptance of gifts and invitations to events	M	M	M	L

Area of activity	Risk	Risk Factor	Inherent Risk Assessment			Residual Risk
			PO	ID	RL	
	(private sector)	Involvement with third parties associated with corruption/integrity risk situations	M	H	H	L
	Illegal financing of political parties	Attribution of sponsorships and donations	L	M	M	L
Judicial	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	L	H	M	L
	Bribery	Intervention in court proceedings	M	M	M	L
	Active corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	L	H	M	L
	Passive corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	L	H	M	L
Regulation	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	M	H	H	L
Provision of technical and laboratory services	Active corruption (private sector)	Business relations with natural/collective persons from countries with high levels of corruption	M	L	M	L
	Active corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	L	M	M	L
	Passive corruption (private sector)	Business relations with natural/collective persons from countries with high levels of corruption	M	M	M	L
	Passive corruption (private sector)	Negotiating/Contracting with private third parties (conflicts of interest)	M	M	M	L
Generation hubs/ centres / energy generation management	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	H	H	H	M
		Attribution of sponsorships and donations	M	H	H	L
	Passive corruption (private sector)	Negotiating/Contracting with private third parties	H	H	H	L
Electricity distribution networks management	Active corruption (public sector)	Relationship with Public Officials and Politically Exposed Persons	H	H	H	M
		Attribution of sponsorships and donations	M	H	H	L
	Passive corruption (private sector)	Business relations with natural/collective persons from countries with high levels of corruption	H	H	H	L
		Negotiating/Contracting with private third parties	H	H	H	L

Area of activity	Risk	Risk Factor	Inherent Risk Assessment			Residual Risk
			PO	ID	RL	
Consumption Data and Meter Readings Management	Passive corruption (private sector)	Access to commercially sensitive information/privileged or confidential information:	H	H	H	L
Sales/Marketing of energy and services in the free market	Passive corruption (private sector)	Negotiating/Contracting with private third parties	H	H	H	L
		Access to commercially sensitive information/privileged or confidential information:	H	H	H	L
	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	H	H	H	L
		Attribution of sponsorships and donations	L	H	M	L
		Attribution of gifts and invitations to events	L	H	M	L
	Active corruption (private sector)	Attribution of sponsorships and donations	M	H	H	L
Attribution of gifts and invitations to events		L	H	M	L	
Energy trading on the regulated market	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	H	H	H	L
	Passive corruption (private sector)	Access to commercially sensitive information/privileged or confidential information:	H	H	H	L
Property Asset Management	Passive corruption (private sector)	Negotiating/Contracting with private third parties	L	M	M	L
	Active corruption (public sector)	Relationship with public officials and/or politically exposed persons	L	M	M	L
Energy trading	Passive corruption (private sector)	Access to commercially sensitive information/privileged or confidential information:	H	H	H	L
Management of corporate insurance programmes	Passive corruption (private sector)	Negotiating/Contracting with private third parties	M	M	M	L
		Access to commercially sensitive information/privileged or confidential information:	H	M	H	L
	Active corruption (private sector)	Negotiating/Contracting with private third parties	M	M	M	L

PO – Probability of occurrence
 ID – Impact Degree
 RL - Risk Level