edp

Safety, Security & Business Continuity Report

We Choose Earth

This Report

EDP – Energias de Portugal, S.A. (hereinafter referred to as EDP), with head office in Lisbon, at No. 12 Avenida 24 de Julho and with its securities listed on the Euronext Lisbon stock exchange, was a result of the transformation of Electricidade de Portugal, E.P., formed in 1976 following the nationalization and consequent merger of the main companies in the electricity sector in Mainland Portugal. In 1994, as defined by Decree- -Laws 7/91 and 131/94, the EDP Group (hereinafter referred to as the EDP Group or Group) was created after the spin-off of EDP, which resulted in a group of subsidiary companies 100% held directly or indirectly by EDP itself.

The EDP Group's activities are currently focused, on the one hand, on the areas of generation, transmission, distribution and sale of electricity and, in addition, the area of the sale of natural gas. In addition, the EDP Group is dedicated to activities in the areas of engineering, laboratory tests, professional training, provision of energy services and management of its real estate assets.

The EDP Group operates in the energy sector, mainly in the European, American and APAC markets.

The Safety Security & Business Continuity report presents an overview of the most important activities undertaken by the EDP Group and the main indicators in 2022 in Safety Security & Business Continuity matters.

This report complements the information of the main consolidated indicators in the Integrated Report 2022 according to the standards contained in the Global Reporting Initiative (GRI - Standard) — [EU 17, EU 18, EU 25, GRI 403-1 a 403-10].

Our energy

Speaks of our stamina, our track record and what drives us to continuously deliver green energy

and heart

Highlights our people and their key role in delivering our commitment to our clients, partners and communities

drive a better

Reflects our ambition and leadership making change happen

tomorrow

The reason why we work every day

Index

Our
heart

Our Safety

1

Safety in numbers

EDP Group

Employees + Service Providers

Accidents	133
Fr	1.84
TSr	526
Fatal Accidents	5
Near-misses reported	471
Volume of OH&S training (hours)	349,741
ISO certification 45001 – installed capacity (%)	96
ISO certification 45001 – employees covered (%)	81

Portugal

Employees

Accidents	10
Fr	1,00
TSr	109
Fatal Accidents	0
Volume of OH&S training (hours)	28.112
ISO certification 45001 – employees covered (%)	100

Service Providers

Accidents	50
Fr	3.48
TSr	1,412
Fatal Accidents	3
Volume of OH&S training (hours)	50,903

Spain

Employees

Accidents	2
Fr	0.55
TSr	51
Fatal Accidents	0
Volume of OH&S training (hours)	21,239
ISO certification 45001 – employees covered (%)	100

Service Providers

Accidents	23
Fr	4.10
TSr	361
Fatal Accidents	0
Volume of OH&S training (hours)	153

Rest of Europe
Poland, Romenia, Italy, France, Belgium, UK, Greece, Hungary

Employees
Accidents	1
Fr	1.73
TSr	2
Fatal Accidents	0
Volume of OH&S training (hours)	2,457
ISO certification 45001 – employees covered (%)	99

Service Providers
Accidents	0
Fr	0.00
TSr	91
Fatal Accidents	0
Volume of OH&S training (hours)	180

South America
Chile – Brazil – Colombia

Employees
Accidents	8
Fr	1.10
TSr	21
Fatal Accidents	0
Volume of OH&S training (hours)	115,553
ISO certification 45001 – employees covered (%)	49

Service Providers
Accidents	32
Fr	1.36
TSr	566
Fatal Accidents	2
Volume of OH&S training (hours)	120,377

North America
Canada – USA – Mexico

Employees
Accidents	0
Fr	0.00
TSr	120
Fatal Accidents	0
Volume of OH&S training (hours)	8,888
ISO certification 45001 – employees covered (%)	37

Service Providers
Accidents	0
Fr	0.00
TSr	0
Fatal Accidents	0
Volume of OH&S training (hours)	0

APAC
Vietnam – Singapore

Employees
Accidents	7
Fr	4.81
TSr	47
Fatal Accidents	0
Volume of OH&S training (hours)	251
ISO certification 45001 – employees covered (%)	0

Service Providers
Accidents	0
Fr	0.00
TSr	0
Fatal Accidents	0
Volume of OH&S training (hours)	1,628

Occupational Health and Safety Policy

The Occupational Health and Safety Policy and approved principles apply to all companies in the EDP Group

The Health and Safety of all those who contribute to the development of the companies that are part of the EDP Group — workers, suppliers, service providers, customers, and other stakeholders — is deemed a key value and a priority for the commercial success of the Group. The development of a positive safety culture is only possible with the involvement of everyone through a participatory and collaborative attitude towards safety at work.

People are at the heart of EDP Group's strategic agenda, which accepts responsibility for guaranteeing the conditions necessary for them to adapt to the new work demands resulting from digitisation and the development of the business, especially in matters related to Occupational Health and Safety.

EDP Group makes a commitment based on the principles of sustainable development and, by applying the highest ethical standards, will achieve exceptional performance levels, making the EDP Group a progressively better place to work.

In 2019, EDP Group's Occupational Health and Safety Policy was revised in the light of the new reference standard "ISO 45001:2018 — Occupational Health and Safety Management Systems". The Policy was adjusted to the requirements of the new framework, in the following aspects: (i) inclusion of a commitment to worker participation and consultation; (ii) adaptation of the concepts of worker and stakeholders; (iii) clarification of the scope of the business; (iv) inclusion of sustainability and business ethics commitments.

The EDP Commitment

The business management of EDP Group is determined constantly to strengthen the culture of Occupational Health and Safety by developing awareness, cultivating willingness and making available the resources required for:

- Ensuring a safe and healthy work environment guaranteed to prevent adverse health effects;
- Ensuring compliance with legislation and other requirements voluntarily undertaken by the EDP group;
- Promoting the training and informing of employees regarding work-related risks, raising their awareness of compliance with safety standards and procedures;
- Safeguarding facilities and equipment by adopting the best techniques, combined with monitoring and updating operating procedures in order to eliminate or minimise risks to employees, service providers and stakeholders who might come into contact with EDP Group's infrastructures;
- Ensuring the participation and consultation of workers and their representatives in planning, implementing and evaluating the performance of Occupational Health and Safety management.

The effectiveness of the safety policy and EDP Group's ongoing improvement in Occupational Health and Safety must be achieved with the involvement of all levels of management and the support and contribution of employees, service providers, suppliers and other stakeholders. To this end, the EDP Group requires everyone to adopt practices in line with the principles of this policy.

Guidelines for the practice of Occupational Health and Safety within EDP Group

1. Safety — understood as Occupational Health and Safety — is an integral part of the activity of EDP Group companies and is present at every stage of the decision-making process: in planning, construction, operation and maintenance, in staff management, procurement, commercial activities, customer relations, supplier relations and with the general public.
2. Safety is an attitude and a desire — inherent in everyone's activity — which is expressed at all times through respect for and compliance with legal requirements, standards, rules and procedures, and in the taking of initiative and contributions to its improvement.
3. Safety is intrinsic to line management, with line managers being responsible for enforcing regulations, making a visible, permanent personal commitment, promoting training and information for their employees and managing the work environment.
4. At all times and in any circumstances, each company undertakes its activities aiming at "zero accidents" through continuous improvement in safety management and performance, including the formulation of key milestones.
5. Safety at work should be achieved through the systematic analysis of risks involving the workers and their representatives, as well as service providers where applicable, so as to identify and deal with all potential risks during the preparation of jobs, in order to arrive at an acceptable level of risk. If safety conditions for the carrying out of a job are not sufficient, it must not be started or, if it is already in progress, it must be stopped.

No situation or urgent service can justify endangering a person's life!

6. The investigation and analysis of incidents — accidents and near-misses — will be carried out systematically and conclusions will be drawn to prevent their repetition, an essential condition for ongoing improvement in the prevention of accidents in the workplace and adverse health effects.

7. No action shall be taken against any employee who expresses concern about an Occupational Health and Safety issue or is involved in a near-miss, unless s/he has consciously and intentionally carried out an illegal action or wilfully disregarded a safety rule or procedure.

8. Safety procedures must be kept up to date at all times in accordance with existing risks and local regulations.

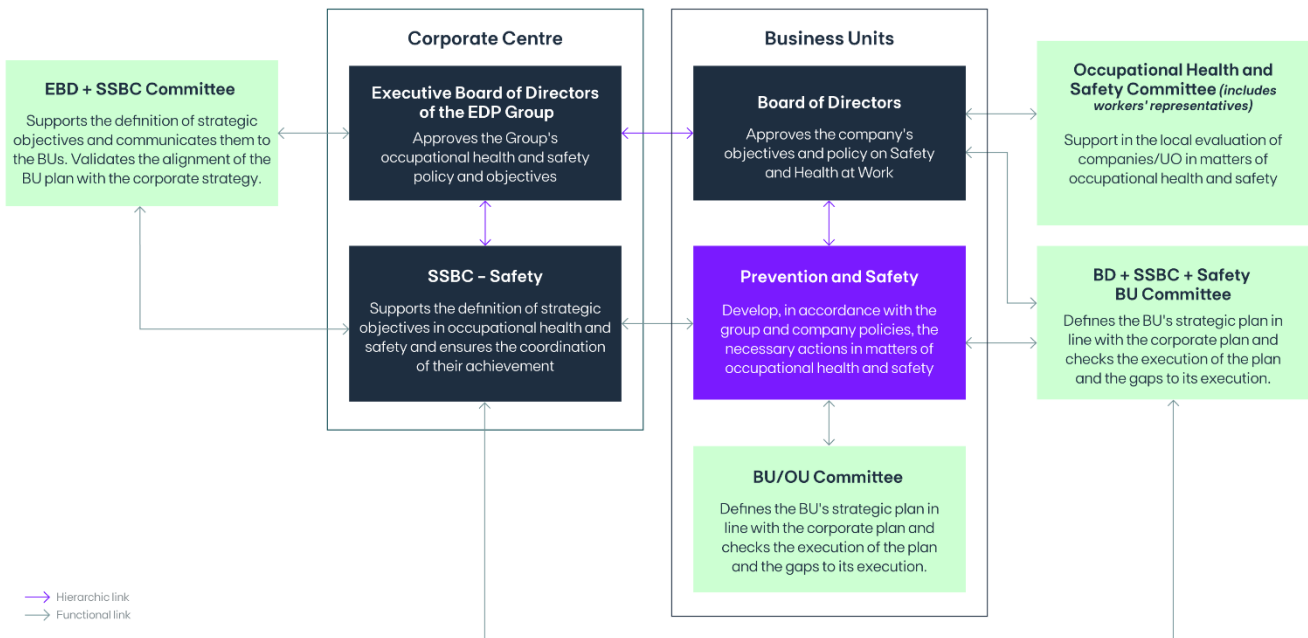# Organisation of Occupational Health and Safety in the EDP Group

The continuous improvement of EDP Group's performance in OHS must be achieved with the involvement of all levels of management and the support and contribution of all.

EDP Group's Occupational Health and Safety Policy demonstrates its commitment to a model of Occupational Health and Safety based on ongoing improvement and the conviction that working in a safe, healthy environment is crucial for employee satisfaction and provides added value in successful results.

The continuous improvement of EDP Group's performance in Occupational Health and Safety must be achieved with the involvement of all levels of management and the support and contribution of all.

The responsibility for the prevention and control of occupational risks rests with the boards of management at the Group's member companies and is integrated into the corporate hierarchy.

Strategic coordination actions are managed within a corporate structure (Safety, Security & Business Continuity Department – Safety area) which supports the Executive Board of Directors and the Prevention and Safety Committee in the definition of strategic objectives and evaluation of results. In turn, the accident prevention and safety services in every Company/Organisational Unit (OU) adopt the initiatives proposed and agreed locally

Corporate Centre

EBD + SSBC Committee
Supports the definition of strategic objectives and communicates them to the BUs. Validates the alignment of the BU plan with the corporate strategy.

Executive Board of Directors of the EDP Group
Approves the Group's occupational health and safety policy and objectives

SSBC – Safety
Supports the definition of strategic objectives in occupational health and safety and ensures the coordination of their achievement

Business Units

Board of Directors
Approves the company's objectives and policy on Safety and Health at Work

Prevention and Safety
Develop, in accordance with the group and company policies, the necessary actions in matters of occupational health and safety

BU/OU Committee
Defines the BU's strategic plan in line with the corporate plan and checks the execution of the plan and the gaps to its execution.

Occupational Health and Safety Committee *(includes workers' representatives)*
Support in the local evaluation of companies/UO in matters of occupational health and safety

BD + SSBC + Safety BU Committee
Defines the BU's strategic plan in line with the corporate plan and checks the execution of the plan and the gaps to its execution.

→ Hierarchic link
→ Functional link

Occupational Health and Safety management system

[GRI 403-1; 403-8]

In EDP Group, Occupational Health and Safety are imperative for the normal development of business activities.

EDP Group's management of Occupational Health and Safety subscribes to the model and principles recommended in the ISO 45001:2018 specification, and to the recommendations of the International Labour Organization, expressed in the ILOOSH 2001 document and in Convention No. 155 on OHS, reinforcing the principle that Occupational Health and Safety issues are managed according to common and cross-cutting criteria in the EDP Group companies. The Corporate Safety Management System (CSMS) is certified by Lloyd's Register.

The CSMS reflects EDP Group's Occupational Health and Safety Policy and defines a set of procedures and actions with a view to:

- Promoting the integration of the management of prevention and safety in organisational management;
- Developing a culture of prevention and safety, contributing to the protection of workers against health hazards and diseases;
- Contributing to the sustainable development of EDP Group companies and reducing losses due to occupational incidents and diseases;
- Disclosing to all interested parties the responsible management of EDP Group regarding Occupational Health and Safety, acknowledging this as an essential aspect of sustainable development.

The CSMS is accessible and applicable to the EDP Group companies in Portugal. In other regions it is applicable according to local particularities, legal and regulatory requirements. Companies can choose to adopt the CSMS or take it as a reference from which to develop their own specific safety management system, according to their business. In this case, consistency must be ensured between the CSMS's guiding procedures and the procedures adopted within the scope of the Companies' own management systems.

The links between the CSMS and the health and safety management in companies can be illustrated as follows:

EDP Group Safety Policy

Corporate safety management system (CSMS)

Specific or local management system

EDP Group Safety Management
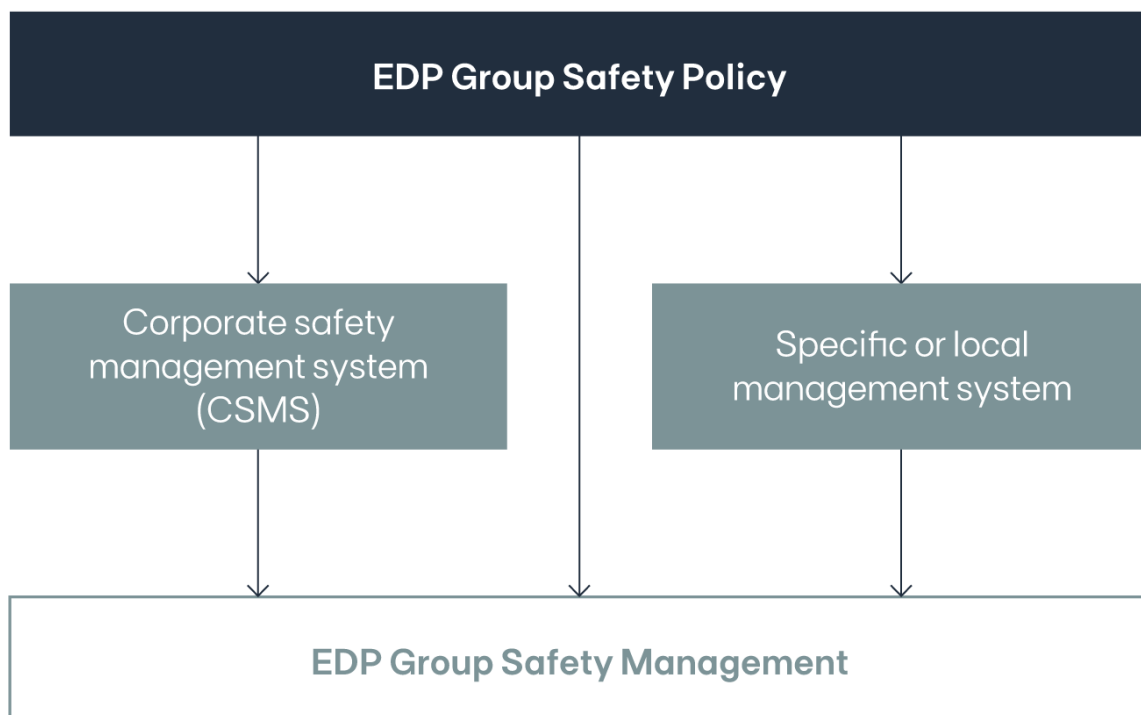
There are currently five safety management systems in Portugal which take the Corporate Safety Management System as a reference.

Safety certifications

In 2022, the EDP Group had a total of 10,604 employees covered by ISO 45001:2018 certifications, a year-on-year increase of 2%, distributed as shown in the table below:

GEOGRAPHY	EMPLOYEES COVERED (#)	EMPLOYEES COVERED (%)
Portugal	6,049	100
Spain	2,092	100
South America	1,767	49
North America	380	37
Rest of Europe	316	99
APAC	0	0
EDP Group	**10,604**	**81**

Elements of the Safety management systems

In 2022, the EDP group counted a total of 15 Business Units (BU)/Platforms certified in occupational health and safety.

	Is there an OHS Management System?	Scope of the system	Standard
E-Redes	Yes	Distribution of High, Medium and Low Tension electrical energy in continental, managed through distribution network infrastructures (Substations, Transformers, HT/MT Lines and LT network) and administrative office buildings.	ISO 45001:2018
EDP Produção	Yes	Management of strategic plans, information and development in health and safety at work matters in EDP Produção activities.	ISO 45001:2018
EDP Comercial	Yes *Integrated Environmental and Safety System (SIGAS)*	Trading in energy and associated products and services, encompassing all the activities of EDP Comercial.	ISO 14001:2015 ISO 45001:2018
EDP Global Solutions	Yes *(SIGAS)*	Centralisation, development and optimised management of support and management processes in the areas of support to EDP group management, procurement, leasing and management of construction, improvement and remodelling of EDP´s estates to support the group's activities. Integrated planning and management of the EDP group's property portfolio, in line with the BU's objectives. Generate revenue through the valuation and marketing of available real estate assets. Management of the portfolio of holding companies	ISO 14001:2015 ISO 45001:2018
SU Eletricidade	Yes *(SIGAS)*	Sale and purchase of electric energy	ISO 14001:2015 ISO 45001:2018
EDP Inovação	Yes *(SIGAS)*	Promotion and innovation in technology and the business model in EDP group strategic areas.	ISO 14001:2015 ISO 45001:2018
EDP Internacional	Yes *(SIGAS)*	Provision of advice and investment in international markets outside EDP's consolidated business platforms, excluding investments in wind and solar generation.	ISO 14001:2015 ISO 45001:2018
Sãvida	Yes *(SIGAS)*	Provision of services in primary care, in compliance with the EDP group´s health plan.	ISO 14001:2015 ISO 45001:2018
EDP SA	Yes *(SIGAS)*	The corporate management of policies, commitments undertaken and environmental performance of the EDP group.	ISO 14001:2015 ISO 45001:2018
EDP Gás SU	Yes *(SIGAS)*	Trading in Natural Gas to customers in the regulated market, encompassing all the activities and services performed in the north coast concession area.	ISO 14001:2015 ISO 45001:2018

	Is there an OHS Management System?	Scope of the system	Standard
Labelec	Yes *Integrated Quality, Environmental and Safety System*	Provision of laboratory and on-site testing services in the following areas – Testing of electrical equipment and systems; Examination of power transformers and cutting and manoeuvring equipment (VHT, HT and MT); Analysis of lubricating oils and insulators; Analysis of the insulating role of power transformers; Calibration of equipment in the electrical domain; Electromechanical and climatic tests; Energy quality monitoring; Ground thermographic tests and aerial inspections of power lines; Tests on electric energy meters; Audits of electric power metering systems; Provision of accreditation services and technical inspections of equipment, consulting in the field of energy and conducting studies of electrical power system networks and equipment; Provision of laboratory services for the collection and physicochemical and biological analysis of different types of water; analysis of sediments, residues and fuels; evaluation of the ecological quality of rivers, reservoirs and lakes.	ISO 14001:2015 ISO 45001:2018 ISSO 9001:2015
EDP Spain	Yes	All OHS activities carried out by the companies that make up EDP Spain and that have adopted EDP Spain´s joint prevention as a precautionary method, both for EDP employees and for external personnel who carry out their activities at the organisation's facilities	ISO 45001:2018
EDP Brazil	Yes	Administrative services to support the BU of generation, transmission, distribution, marketing and electric energy services in the organisation in Brazil.	ISO 45001:2018
EDP Renewables EU&LT	Yes *(Includes EDP Renewables PT, ES, RO, IT, RU, PL, FR, BE, GR, HU, CL, CO and BR)*	Production of energy through renewable technologies (wind and solar), operation and maintenance services at renewables facilities for electricity generation, office support activities for the generation of energy through renewable technologies, including but not limited to design management, development, and licensing and the management of construction activities	ISO 45001:2018
EDP Renewables North America	Yes *(SIGAS)*	Provides a central location for information about Environment and SafetyPolicies for operational sites, including but not limited to Emergency Action Plans, EHS Policies, Standard Operating Procedures, Tracking of EHS Incidents.	ISO 14001:2015 ISO 45001:2018

The certification covers 96% of installed capacity in production activities (Portugal 8,244MW, Spain 5,325MW, Rest of Europe 1,700MW, South America 3,114MW e North America 6,370MW).

In accordance with international standards, all certified management systems which cover the number of employees mentioned above are subject to internal and external audits.

Goals and targets

The setting-out of Occupational Health and Safety goals and the action programmes needed to achieve them is carried out in accordance with the internal procedure "Management Objectives and Programmes" of EDP Group's CSMS.

These objectives may be defined at the corporate level, approved by the Executive Board of Directors (EBD), or at the level of each company/organisational unit, approved by the respective Boards of Directors and in line with corporate objectives.

The implementation of EDP's annual Occupational Health and Safety programme was based on a set of actions aimed at preventing occupational accidents, as measured by a reduction in frequency rates and the seriousness of accidents and occupational diseases, and included training for EDP employees and service providers, ongoing evaluation and control of labour risks and the implementation of an internal and external inspection and audit programme for EDP facilities and works.

The monitoring of these objectives' implementation is ensured on a quarterly basis through the Safety, Security & Business Continuity Department – Safety area, and every three months through the Prevention and Safety Committee, which analyses the progress of actions and proposes any measures necessary.

The Safety at Work Actions Operating Plan (SWAOP) sets forth the commitments and initiatives undertaken by the organisational units for implementation of the 6 strategic pillars defined at strategic and corporate level, in terms of Prevention and Safety approved for 2020/251.

1. Managerial commitment to OHS;
2. Behaviours, preventive activities and learning from mistakes;
3. Streamlining, digitising and standardising OHS processes in the EDP Group;
4. Skills;
5. Communication and involvement;
6. OHS management in contracts with ESPs.

These priorities were established at EDP Group level, by considering recent results and trends in the main KPIs for Occupational Health and Safety including, in particular, inputs from accident analyses and internal and external audits of safety management and works carried out for EDP.

Of those measures to be developed in EDP Group for 2022 with a view to strengthening the culture of safety, those associated with behaviours are highlighted as well as measures to encourage and facilitate service providers' risk

management, the proposal to create performance indicators associated with the results of safety at work and the prevention and control of psychosocial risk factors.

The following table summarises the number of targets set for 2022:

GEOGRAPHY	OBJECTIVES (#)	DEGREE OF ACHIEVEMENT (%)
Portugal	20	95
Spain	3	100
Brazil	8	100
Renewables	3	100
EDP Group	**34**	**97**

Safety audits

EDP Group undertakes annually, by agreement with its various business units, a wide programme of internal audits for Occupational Health and Safety according to the importance and risk of ongoing activities and the results of previous audits, and covers construction, maintenance or demolition of buildings or infrastructures for the generation and distribution of electricity and also the operational activities of marketing and energy services, including EDP employees and service providers.

These audits, depending on their nature and scope, may take the form of system management audits, technical audits or inspection audits. In addition to these, EDP Group is subject annually to a significant number of external audits resulting from safety management systems certification, and from inspection activities by external bodies such as insurers or Government institutions. In EDP Group, audits follow the guidelines laid down by ISO 19011:2018 reference standard.

The table below summarises the audits conducted in 2022

GEOGRAPHY	AUDITS CONDUCTED BY EXTERNAL BODIES (#)	AUDITS CONDUCTED INTERNALLY (#)	INTERNAL AUDITS TO EXTERNAL SERVICE PROVIDERS (ESPS) [1] (#)	ESPS AUDITED (#)
Portugal	18	7,665	16,939	864
Spain	5	5	5,385	276
South America	14	102	41,210	113
North America	5	300	1,956	127
Rest of Europe	9	5	279	61
APAC	3	7	735	1
EDP Group	**54**	**8,084**	**66,504**	**1,442**

(1) Includes safety briefings (SPO, Safety Walks, etc); Others (coordination of safety at work, etc.)

SAFETY AUDITS

74,643

Appropriate audit programmes have been determined (internal and external) in the various Business Units in Portugal, in compliance with their internal and corporate procedures. In accordance with the circumstances of the business, audits are carried out within the scope of management system certification and also at a more operational level (work in the field, facilities, ESP, etc.)

E-Redes has two audit procedures, one which determines the methodology for planning and carrying out internal OHS audits in order to verify that the management system conforms to the organisation's own requirements and the requirements of standard NP ISO 45001:2019. The second procedure is focused on operational planning and control, determines the method for operational surveys of administrative buildings, technical facilities, works on the distribution network and external service providers.

At EDP Spain, a schedule of audits is determined at the beginning of the year, taking into account the process of internal and external audit in the context of management system certification as well as operational activities.

At EDP Brazil, the audit programme is planned, established, implemented and maintained taking into consideration the risk analyses of the activities and the results of previous audits. Internal audits are carried out in order to determine whether the management system complies with the legal provisions that apply in Brazil and whether it is implemented and maintained effectively. EDP Brazil has an internal procedure that details the systematic planning, execution and registration of audits, as well as the monitoring activities and competencies of the auditors, and also: (1) the activities and areas to be audited; (2) the responsibilities associated with managing and conducting the audits; and (3) the reporting of audit results.

The process followed by EDPR EU&LA [1] for the development, planning, implementation, evaluation and recording of audits is in line with the management procedure system. The object of these audits is to obtain objective information on the functioning of the management system, allowing the detection and identification of possible deviations and/or anomalies and proposing corrective actions.

EDP Group considers Occupational Health and Safety audits as a means of assessing its systems' performance with the aim of continuing improvement and raising the awareness of every worker as to the importance of their role in this aspect. It is the

audits which reveal not only the deficiencies, but also the strengths of the organization at any one time.

Internal and external customer satisfaction is a priority in the achievement of success, but the motivation and fulfilment of workers is crucial to inculcating a strong, united culture of safety. 30,945 Safety audits 20 Workers' involvement is an essential element for the Occupational Health and Safety Management Systems in EDP Group.

This involvement is rooted at the individual level — each worker acts at all times by respecting and implementing standards, rules and instructions and helps to improve them as a result of their own initiative and contribution — and with workers' representatives acting for occupational health and safety which include the Safety Committees and Subcommittees within the companies.

Employees, through their elected representatives, actively participate in the processes of planning, implementation and operation, verification and corrective actions and revision with a goal of ongoing improvement of the Occupational Health and Safety Management Systems within EDP Group.

(1) Includes EDPR RO, IT, UK, PL, FR, BE, GR, HU, COL, CH, BR, PT e SP

Hazard identification, risk assessment and incident investigation

[GRI 403-2]

Occupational risk management

Main risks associated to EDP's activities:

Electrical risk

Fall from height

Cargo handling

EDP Group has established and implemented processes for the identification of hazards, risk assessment and opportunities for Occupational Health and Safety, according to the nature of the different activities carried out within the EDP Group, legal and other requirements, all stakeholders and best practice.

The identification and assessment of occupational risks at EDP Production and EDP Global Solutions is carried out in accordance with CSMS´s internal "Occupational Risk Management" procedure, involving routine and one-off activities and for all people who have access to the workplace (service providers and visitors), or who may be affected by EDP's activities in the vicinity of the workplace. This assessment is conducted before any work is carried out or whenever situations are demonstrated involving:

- Changes to or introduction of new activities and procedures;
- Remodelling or introduction of new facilities;
- Occurrence of incidents;
- Non-conformities or dangerous situations and implementation of corrective actions

and, at least once a year, as part of the review of Occupational Health and Safety management systems.

This is carried out through a systematic and duly documented methodology, which in general establishes the:

1. Identification and characterisation of the activities surrounding particular jobs;
2. Identification of the risks associated with the identified activities;
3. Risk analysis carried out by combining the probability of an accident occurring with the severity of the respective injury or associated disease, taking into account the control measures which are available to the worker;

4. Determination of risk acceptance and definition and implementation of complementary risk control measures, if the residual risk level determined with the existing control measures is not acceptable.

E-Redes identifies dangers and assesses risk according to internal procedure, involving the Organisational Units responsible for the activities and facilities that identify and define the most frequent risk activities carried out by employees.

At EDP Spain, risk identification and assessment is carried out in accordance with a procedure in its management system. A risk study and evaluation are carried out through visits to the various workplaces and facilities, directly observing the execution of the various activities, involving the employees and then presenting the results to those responsible for each area.

EDP Brazil identifies, classifies and evaluates the risks associated with the activities developed at its BU in accordance with a procedure in its management system.

At EDP Renewables North America (EDPR AN), the process of risk identification is carried out by the team through a safety analysis before each job. In addition to this process, EDPR NA has developed a risk assessment for each activity, both in solar and wind power, where the dangers and respective control measures are identified, including operating procedures and protective equipment.

In the remaining EDP Renewables geographies, the process for identifying dangers and risk assessment arising from the company's activity and facilities is developed in accordance with a management system procedure in which responsibilities and methodologies are identified to ensure the mitigation of risk.

Communication of risks to workers

At EDP Produção and EDP Global Solutions, communication of risks to employees is done individually or through training sessions where the relevant risk cards are handed out and explained to employees. In the case of service providers, they are informed of existing risks before starting work at EDP facilities. Those responsible for hiring liaise with local prevention and safety departments so that they can provide the relevant training.

At E-Redes the communication of risks is carried out by line management when hiring employees, or when there is a change of activity, or through training/awareness-raising activities.

For the employees of EDP Comercial, risks are communicated after they join the company, when they receive by email their professional risk card, which contains all the information necessary for them to be aware of the risks.

At EDP Spain, once the workplace risk assessment has been completed, it is communicated through an internal preventive management tool, via email, which contains the document and a link to access the tool.

The communication of risks to EDP Brazil employees is made individually through a service order enclosing the risk assessment.

In North America, the risks associated with an activity are reviewed by all before work begins.

In Poland, Spain and Greece, when a new employee joins or changes jobs, Human Resources informs the OHS Department, which then prepares the risk assessment for the respective job and gives it to the employee.

The remaining countries where EDP Renewables operates, risk assessments are communicated at initial training sessions when the employee joins.

Incident investigation

The EDP group, as set out in its Safety Policy and ESG (Environmental, Social and Governance) objectives, has a strategic goal of achieving zero accidents. For this reason, it is essential that during the incident investigation process the root causes and adequate preventive measures are identified to avoid future occurrences. Monitoring the effectiveness of the measures implemented, and disseminating the lessons learned to all BUs, thus promotes the sharing of solutions and best practice that contribute to an EDP group–wide safety culture.

It was in this context that a Safety Review Panel was set up under the coordination of the SSBC, to analyse the action plans drawn up by the BU.

The scope of the Safety Review Panel is the analysis of fatal and serious accidents, considering also the analysis of high-potential incidents.

The Safety Review Panel is a body with a consultative role for the whole EDP group and consists of internal specialists (from the BU) and/or external experts with proven recognition in specific risk/activity areas. This Safety Review Panel is independent of the BU and reports the results of the incident analysis to the EBD.c
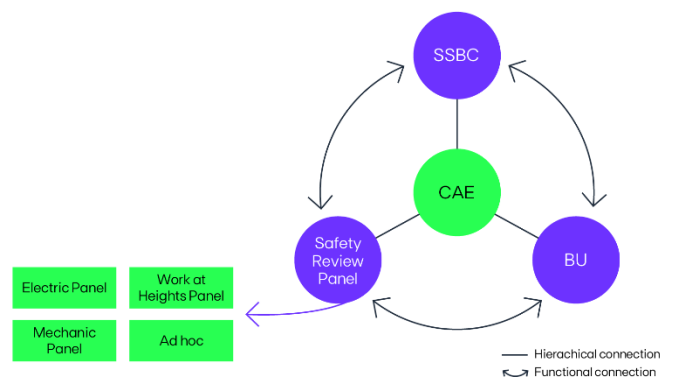
INVESTIGATIONS CONCLUDED

186

EDP Group's Safety policy recognises and establishes the principle that the ongoing investigation and analysis of incidents — accidents and near-misses or hazardous situations — systematically conducted are essential conditions for ongoing improvement in the prevention of occupational accidents and occupational diseases.

Every incident is indicative of possible failures or imperfections in the organisation and/or execution of the work. The investigation of the incident consists of identifying them and establishing the facts to eliminate or neutralise them.

Promotion of workers' health

[GRI 403-3; 403-6]

Occupational medicine activities

In accordance with the legislation of each country, EDP Group companies comply with occupational health monitoring requirements with a view to promoting and safeguarding the health and well-being of employees. Various health monitoring programmes guarantee the commitment made towards the prevention of occupational diseases, by complying with the plan for regular medical examinations, workplace inspections, participation in the Occupational Health and Safety and Internal Accident Prevention Committees, and through the implementation of a range of preventive campaigns.

MEDICAL EXAMINATIONS – PORTUGAL

5,367

INCLUDES EDPR PT

In Portugal, the occupational aspect is provided by a shared services company "EDP Global Solutions". In this regard, it is worth noting that, in addition to the basic services for carrying out occupational medical exams, the health promotion and well-being programmes available include giving up smoking, nutrition, prevention and control of alcohol consumption and drug addiction, and correction of posture.

Doctors from the occupational health service are all occupational health specialists and are advised by nurses who are specialised in public health, who carry out a set of activities, mandated by law, which are grouped into three main areas of activity:

- Workers' fitness assessment;
- Assessment of working conditions;
- Training and health promotion measures.

With regard to assessing the fitness of workers, the EDP Group has an "Occupational health protocols" procedure in which it establishes different types of examinations and allied medical protocols, which take into account the different risk factors associated with the professional activity of each worker.

The assessment of working conditions is carried out in collaboration with the Prevention and Safety areas of each

company, whether during visits to workplaces or in subcommittee, committee and safety committee meetings. Whereas in the first area of action (assessment of the fitness of workers) the focus is on the worker, the main objective of analysis here is the work itself: noise, vibrations, lighting, thermal conditions, ergonomic design of the workstations, organisation of work (workflow, breaks, etc.). In subcommittee, committee and safety committee meetings, occupational medicine contributes to the analysis of absenteeism — illness, accidents, safety equipment, etc.

Training and health promotion activities aimed at the adoption of healthy habits and lifestyles by workers in order to substantially reduce the risk of developing preventable diseases (cardiovascular, pulmonary, metabolic and carcinoma) and which are carried out in conjunction with the human resources departments and prevention and safety divisions at EDP Group's various companies and, whenever requested, with external organisations, e.g., the Portuguese Diabetes Protection Association (APDP), the Portuguese Cardiology Foundation (FPC), or the intervention service for addictive behaviour and dependencies.

MEDICAL EXAMINATIONS – SPAIN

1,155

INCLUDES EDPR SP

In Spain (EDPR Spain and EDP Spain), the occupational element is ensured by a specific occupational health department, composed of doctors and occupational nurses. This department is responsible for ensuring the medical check-ups, health promotion and first-aid courses for internal employees. Regular examinations are made in accordance with legal requirements and EU legislation. These regular examinations are carried out in accordance with the risks identified in risk assessments.

At EDPR AN, the occupational element is ensured through an external partner that develops programmes, exercises and aptitude evaluations for its own employees.

During 2022, EDPR NA carried out two ergonomics campaigns to promote stretching and bending exercises that were developed specifically for wind and solar technicians. These campaigns lasted 6 and 3 weeks respectively and have covered themes such as "How to protect your knees", "Nutritional tips on how to reduce inflammation", "Working in confined spaces" and "Preparation for climbing"

Conforming with Romanian legislation, EDPR Romania complies with the legal requirements for occupational health management in order to promote and safeguard the health and well-being of employees. Doctors from the occupational health service are also involved in risk assessment, for a better overview of the risks related to occupational diseases. Medical examinations are carried out by an external partner, based on the assessment of risk in each job.

MEDICAL EXAMINATIONS – EU&LT

246

NOT INCLUDING PT AND SP

At EDPR Poland, before hiring and as established during hiring, medical examinations are carried out according to the specification issued by HR and the OHS. The detailed description and scope of examinations, as well as their frequency, are specified in the legal regulations. In 2022, campaigns were carried out by an external organisation (examinations for the 50+ age group, flu vaccinations, etc).

In line with the activities currently undertaken by EDPR RU, there is no legal requirement for occupational health checks other than vision tests. In line with the 2023 plan, medical check-ups and awareness-raising campaigns will be put in place for all internal employees.

At EDPR Italy, the monitoring of employees´ health is managed through an external medical practice in compliance with the country's legal requirements.

Occupational health management at EDPR Hungary is ensured by and external organisation that carried out initial and regular examinations, in line with the legislation with the place. This body is also responsible for carrying out medical check-ups and first aid training at the request of EDPR Hungary. Also upon request, they may supply specific training courses and, furthermore, provide personal health advice to each employee following medical assessments.

At EDPR Greece, all employees who carry out work inside the turbines and who work at height must hold medical certificates indicating that they are fit for this type of work. In addition, all employees, regardless of their role, are subject to annual opthalmological and musculo-skeletal examinations, in line with the legislation in place.

In the case of EDPR France and Belgium, the occupational health service is external, relying upon the support of a doctor in each region where there are EDPR employees. These services include site visits, health and safety advice and ergonomic studies (noise, vibration, etc).

At EDPR Chile, occupational health management is carried out in conjunction with mutual insurance and as well as the management of occupation health examinations, programmes are determined for the prevention of occupational diseases.

Through its contractual conditions, EDP Group requires that its whole service provider chain complies with the legal requirements in place in each country related to the framing and obligations of occupational health matters for employees, thus ensuring that every employee is properly monitored.

During 2022, EDP Group carried out 10,311 medical examinations, 1,175 consultations with employees on nutrition programmes, 1,105 cardiovascular screenings and 3,776 vaccination programmes for influenza, hepatitis B and yellow fever, covering 1,212 employees. Also within the scope of occupational medicine, 11 screening sessions for alcohol and drugs were carried out.

The EDP Group monitors and follows up the occurrence of occupational diseases. In 2022, 2 cases of occupational sickness were registered in Portugal.

Medical exams carried out – EDP group
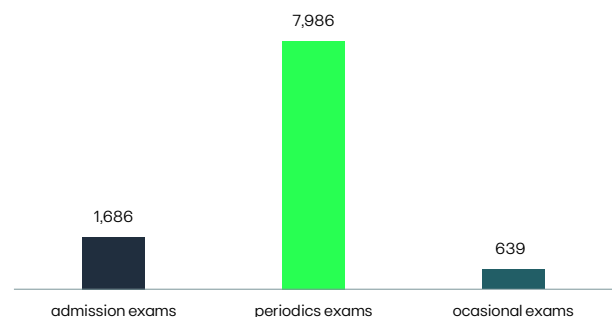
However, in general terms, the EDP Group believes that in the undertaking of its activities and the proper implementation of existing control measures, employees are not exposed to occupational or work-related diseases which may be considered high incidence or high risk.

Health care

In Portugal, a medical and prescription assistance scheme is maintained complementary to the health care provided or assured by the national health service or personal health subsystems.

EDP Portugal offers its workers health care in terms of assistance through individual health insurance and through "Sãvida – Medicina Apoiada SA", an EDP Group company which provides services in the health care field, thus complying with the EDP health plan in Portugal.

Sãvida has central medical posts where some medical specialties and peripheral posts are located. The provision of health care is carried out at its own medical centres and client companies where, in certain cases, in addition to General Practice, there are doctors from other specialisms.

In addition to providing services at medical centres, Sãvida also has a large group of specialist doctors and private facilities (hospitals, clinics, etc.), with whom it has agreements in place.

Individual health insurance, in addition to ensuring a wide network of providers and the possibility of choosing a medical officer for the insurer, also gives access to a network of pharmacies that provide access to services and health care.

As in Portugal, EDP also offers its employees in Spain (EDPR and EDP Spain) health insurance additional to public health services.

EDPR Romania offers its employees a supplementary assistance scheme, which, through health insurance, provides services complementary to the national health system.

In Poland, EDPR also offers private medical insurance with family coverage.

EDPR Italy provides its employees with health insurance complementary to public health services.

In Greece, EDP provides private health insurance over and above medical appointments, diagnostic tests and medicines, which includes physiotherapy, hospital admissions, maternity care, etc.

Participation, consultation and communication

[GRI 403-3]

Employees representatives

Depending on each country's legislation, the EDP Group companies include the participation and consultation of employees in their safety management system.

Furthermore, EDP Group's OHS Regulation provides for the setting up of OHS Committees and Subcommittees in their companies and large business units.

These committees and subcommittees are equal and comprise the workers' OHS representatives, elected in accordance with legally established requirements, and representatives of the companies, meeting at the intervals established by the respective regulation.

The consultation and employee participation processes in Occupational Health and Safety primarily use the channel provided by these representatives and the safety committees and subcommittees.

The following table shows the representation and intervention of staff representatives in EDP Group:

GEOGRAPHY	ELECTED REPRESENTATIVES (#)	WORKERS REPRESENTED (%)	MEETINGS HELD (#)
Portugal	53	87	44
Spain	20	56	38
South America	141	77	387
North America	55	44	2,141
Rest of Europe	11	66	8
APAC	3	16	4
EDP Group	**280**	**75**	**2,618**

Safety at work topics covered by agreement with trade union organisations

Depending on each country's legislation and the existence of collective bargaining agreements, when existing, they cover, in principle, all employees with regard to occupational health and safety clauses.

Accordingly, in Portugal and Spain, EDP has established agreements in the field of Occupational Health and Safety with trade unions covering 100% of the employees and in the following areas:

- Obligations of employees and companies;
- Representation of workers for Occupational Health and Safety;
- Responsibilities of prevention and safety services;
- Safety standards and equipment;
- Industrial hygiene;
- Training, information and awareness-raising on Occupational Health and Safety;
- Occupational Health and Safety indicators;
- Risk factors for employees.

Prevention and safety committee

Corporate and strategic Occupational Health and Safety in EDP Group are approved at executive board of directors (EBD) level following evaluation and agreement by the Prevention and Safety Committee, in which various EDP Group companies from different geographical areas are represented at the highest management level. This committee has as its main competences:

- Support the EBD in the drawing up of proposals for the definition of EDP Group's corporate and strategic documents
- and objectives in matters of OHS and assess and monitor compliance with these;
- Analyse and issue an opinion on EDP Group's OHS Operational Action Plan;
- Monitor the development of the main occupational safety indicators and propose improvement actions;
- Understand the standardising documents of the CSMS which have a general scope within EDP Group or have a crosscutting impact on its various sectors and activities

This committee meets twice a year. The activities resulting from the committee's proposals are locally implemented and

developed by the prevention and safety areas of the business units.

In line with the recommendations provided for in the "PlayitSafe" culture programme, EDP will have a new system of Prevention and Safety Committees in 2023.

EDP´s organisation and BU committees contribute to the decision-making process on two fronts:

- they are a source of information to support decision-making by the Executive Board of Directors, reflecting the opinion and information of organisational areas most affected by decision-making
- they are management tools used by an Organisational Unit (part of the Corporate Centre or a Business Unit) to support the process of information collection, alignment, decision making and implementation of policies and practices that have cross-cutting impact.

The corporate committee - this committee will be chaired by the Director of the Executive Board of Directors with responsibility for the area of Safety and administrated by the Director of the SSBC. It will support the management in Safety issues. The Committee will meet three times a year.

The BU committee[1] — this committee will be chaired by the member of the Board with responsibility for Safety and administrated by the Director of the SSBC. Its mission will be to issue advice on proposals for determining objectives, activity plan and regulatory documents on prevention and safety at work. It evaluates the development of key indicators and proposes improvement actions. Apart from the BD and the SSBC, the BU´s OHS committee is also involved. The Committee will meet 4 times a year. In addition to these two committees it was recommended that 6/year committees in the 1st line, operational departments at each BU.

[1] Each BU will have its own committee. In other words, each BU will hold 4 committees a year.

Communication to all stakeholders

Internal

O grupo EDP disponibiliza a todos os trabalhadores do grupo um espaço para divulgação das principais notícias de diferentes temas com relevância para a empresa na sua rede informática que é a "intranet", onde está incluído um espaço dedicado à informação de SST, em que consta para além de toda a informação sobre este tema, toda a documentação que compõe o sistema de gestão de segurança corporativo (SGSC).

Each person responsible for the organizational units, with the support of the prevention and safety areas, fosters the communication of the relevant information of the safety

management system (safety policies, safety objectives, performance of the safety management system, etc.).

In 2022, an internal communication plan across the EDP group was established. This plan is based on the monthly communication of risks and types of work articulated in all the BUs.

In addition to these communications, the results of the EDP group´s OHS performance are communicated monthly to all EDP group employees, as well as the summary of accidents and lessons learned.

The development of communication and dissemination actions with health repercussions for workers (effects of

tobacco, alcohol, etc.) are the responsibility of the occupational medicine department.

External

On EDP's internet site (edp.com), (https://www.e-redes.pt/en) and (https://www.edpr.com/en), there is a space reserved for the dissemination of information on Occupational Health and Safety specifically to customers and service providers.

For example, there is a space for dissemination of information on OHS for clients and ESP on EDP Brazil and E-Redes´ external website.

EDP Brazil

E-Redes

OHS training

[GRI 403-5]

OSH training for EDP employees

HOURS OF TRAINING

176,500

One of the commitments laid down in EDP Group's Safety Policy and Code of Ethics concerned with providing suitable conditions for the sustainable development of its employees and service providers in matters of safety at work.

Training in matters of Occupational Health and Safety is delivered in accordance with the CSMS procedure "Safety Training, Awareness and Competence".

For EDP employees, the identification of training needs is carried out at the start of an activity or new role and during employee performance evaluations.

This identification is undertaken by agreement between the employee and their line manager and takes into account the prevention of risks that may arise from:

- Work activity;
- Change in employee's job;
- New workplaces;
- New working equipment and/or changes to equipment;
- Use of new technologies, materials and/or products.

On the first day of work, an employee's line manager ensures that they are informed and made aware of:

- EDP Group's Safety Policy and its application in the workplace;
- Associated work risks and the existing operational means of control, including individual and collective protection;
- Procedures of the corporate safety management system, including the operational control documents applicable to its activity;
- Workplace emergency and evacuation plan;
- The training required for them to perform their job.

At EDP Spain, training takes place in line with the procedure, "Training and Prevention of Risks. Definition of content and its treatment". A training plan is determined every year, based on a training matrix. This matrix was set up in line with the training needs established by risk assessments.

TRAINING ACTIONS

5,398

At EDPR EU&LT an annual training plan was defined, approved by top management and managed by local HR. This plan includes courses that cover technical, management and behavioural areas. Although the training plan is formally approved once a year, whenever a need arises, that need is sent to HR and the plan is updated.

Training needs are identified in line with: (1) change of function, (2) critical activities, (3) risks, (4) accident investigations, (5) injury analysis data, (6) employee consultation and (7) legislation applicable in the geographical regions where EDPR NA has a presence.

The OHS division, together with the HR department, reviews training needs annually in matters of safety. The identification of individual training needs are carried out during feedback meetings, taking into account the technical and strategic needs of each employee.

In 2022, training on Occupational Health and Safety for EDP employees was delivered in an extensive programme comprising:

GEOGRAPHY	ACTIONS (#)	EMPLOYEES INVOLVED (#)	HOURS OF TRAINING (#)	HOURS OF TRAINING/ EMPLOYEES (#)
Portugal	405	8,423	28,112	3.34
Spain	724	6,335	21,239	3.35
South America	3,328	13,101	115,553	8.82
North America	784	7,549	8,888	1.18
Rest of Europe	145	673	2,457	3.65
APAC	12	71	251	3.54
EDP Group	**5,398**	**36,152**	**176,500**	**4.88**

Note: The values shown in the table above only include training/awareness actions that were entered onto the system by EDP University.

OSH training for ESP workers

With regard to service provider training and awareness-raising provided to service provider employees, 9,388 actions related to Health and Safety at Work were delivered, involving 35,432 employees, totalling 173,241 hours, as detailed in the table below.

GEOGRAPHY	ACTIONS (#)	EMPLOYEES INVOLVED (#)	HOURS OF TRAINING (#)	HOURS OF TRAINING/ EMPLOYEES (#)
Portugal	5,398	24,817	50,903	2.05
Spain	109	1,171	153	0.13
South America	3,194	8,674	120,377	13.88
North America	0	0	0	0
Rest of Europe	198	610	180	0.30
APAC	7	160	1,628	10.18
EDP Group	**9,388**	**35,432**	**173,241**	**4.89**

HOURS OF TRAINING

173,241

In Portugal and at EDP Brazil, contractors and subcontractors are obliged to respect the conditions set out in the specifications for safety and health at work in respect of the training and qualification of their employees, so EDP considers that all employees of its external service providers have received the training required to carry out their tasks in safety.

This training is controlled using a document management platform.

EDP Spain´s ESP receive a document containing the specific criteria for training and is not permitted to participate in the work if these training criteria are not met.

External service providers are obliged to respect the conditions established in the OHS specifications in respect of the training and qualification of their employees. EDPR therefore requires all ESP employees to provide proof of how they have received the necessary training to carry out their ESP activities at EDPR Romania's facilities.

At EDPR Poland and Italy, service providers are obliged to follow the requirements set out in labour law.

The United Kingdom ensures that its ESP training is developed and carried out by accredited bodies, as does EDPR Hungary.

In the case of EDPR France e Belgium, mandatory training for each ESP employee working on wind farms is described in the internal procedures and prevention plan, signed jointly by EDPR and the ESP. In order to ensure that training is correctly carried out, EDPR FR&BL requires each ESP to upload

evidence to that effect to the document management platform. In turn, the person in charge of the wind farm only authorises work if all ESP employees have had the compulsory training.

A EDPR NA, garante que os PSE que realizam as atividades nas suas instalações estão devidamente qualificados através dos programas "LOTO Annual Verification of Skills", "Qualified Electrical Workers (QEW)". EDPR NA also carries out working at height exercises every year, which involve both EDP and ESP employees.

In addition to the training delivered by their employers, external service provider employees undertake complementary actions on safe behaviour and specific risk prevention in certain activities or facilities, jointly with EDP employees.

Training on specific hazards related to our activities

For all EDP workers and service providers who have to perform any type of work of an electrical nature in live facilities without electric power or in the vicinity of live electrical facilities, or of a non-electrical nature in the presence or in the vicinity of live facilities or likely to be live, EDP requires that they hold a valid "Electrical Qualification Licence".

For construction, maintenance or demolition work on the electricity generation and distribution infrastructure, EDP requires, as a mandatory and priority requirement for service provider workers, attendance on a basic safety training course.

This training involves obtaining a certificate in basic safety skills acquired through successful attendance on a training course covering the most frequent risks in the workplace and relevant prevention and protection measures.

Employee training is organised in training sub-areas, the details of which are shown in the table below.

CATEGORIES	ACTIONS (#)	EMPLOYEES INVOLVED (#)	HOURS OF TRAINING (#)	HOURS OF TRAINING/ EMPLOYEES (#)
Prevention management	338	7,210	13,108	1.81
Management of emergencies	157	3,272	2,122	0.65
Hygiene and ergonomics at work	65	575	1,205	2.09
Psychosociology of work	10	276	368	1.33
Safety at work	1,566	15,806	61,542	3.89

The following courses are covered in the subareas described in the table above: Working at height and rescue of injured persons; Electrical risk prevention; Vegetation clearance; First aid; Driving electric forklifts; Operation of mobile lifting platforms; Safety in the Use of Scaffolding and Work Platforms; Action in the event of fire; Preventive safety observations; Defensive driving.

2023 Training Plan

In the final quarter of 2022, a new matrix of competencies was designed, centred on each employee´s function, aligned with the risks to which employees are exposed during the execution of their activities.

This work was carried out within the framework of the safety culture programme, "PlayitSafe", with contributions from all areas of Health and Safety at Work and also with the support of the EDP University, which manages all the training themes.

As a result of this work, 37 compulsory training courses were defined (Electrical hazard, Work at height, Defensive driving, Work in confined spaces, etc.)

The skills framework seeks to ensure that all EDP group employees, regardless of geography, have the training necessary for the development of their activities.

Preventive activities

[GRI 203-3; 403-6]

Emergency preparedness and response

Within the scope of emergency situation management, 460 drills were carried out across the EDP Group (128 in Portugal, 120 in Spain, 66 in South America, 94 in North America, 42 in the Rest of Europe and 10 in APAC), covering industrial plants, administrative facilities and works in progress, with the end purpose of testing the effectiveness of the respective emergency plans.

These drills involved external agencies, such as civil protection, fire fighters and police and public security forces.

In addition to the above training, 257 training courses in first aid were delivered to EDP employees and External Service Providers, involving:

GEOGRAPHY	FIRST-AID COURSES (#)	EMPLOYEES INVOLVED (PARTICIPATIONS) (#)
Portugal	40	237
Spain	49	431
South America	361	1,061
North America	32	104
Rest of Europe	14	53
APAC	4	57
EDP Group	**500**	**1,943**

Safety management of suppliers

2023 GOALS

Ensure Occupational Health and Safety accreditation of 100% of suppliers exposed to high risks

The management of sustainability in EDP Group's relationships with suppliers is a strategic factor in the Group's activity. The management process privileges the building of relationships of trust with suppliers based on a partnership approach that embraces the principles of ethics, transparency, and sustainability. The priorities of sustainability in management are defined in the "Sustainable Procurement Policy" and the "Supplier Code of Conduct".

The performance of our External Service Providers (ESPs) is considered a key to the success of EDP Group. We believe that a relationship based on trust, co-operation and value creation shared with our External Service Providers results in the joint ability to innovate and enhance Corporate Social Responsibility policies, while improving the quality of the service provided to our clients.

EDP apportions the minimum sustainability requirements specific to each contract, applying demanding standards. Each contracted activity is judged in relation to the supplier's access to EDP customers, to EDP's technical equipment/workplaces, to sensitive data, to Health and Safety risk exposure, Environmental risks and Ethical risks, to Labour and Human Rights.

Regardless of the type and size of the work to be done, every stage of procurement outsourcing always involves a strict quality control of the service rendered, in which Occupational Health and Safety (OHS) is embedded as a decisive factor.

In this area, EDP has the following mechanisms to regulate the activity of its ESPs with regard to OHS:

- During the registration and selection processes of suppliers, information is requested from Companies for the review and evaluation of the most relevant OHS aspects;
- In procurement processes, binding documentation is included related to the health and safety obligations of ESPs, including organisational, technical and training matters;

- Whilst contracted works are in progress, ESPs' OHS performance is monitored using various methodologies including audits that help evaluate their level of safety and check their compliance with applicable legal requirements;
- Depending on the nature and duration of the works, the evaluation of ESPs' OHS performance is undertaken at different times. This evaluation is based on criteria ranging from a review of documents and prevention methods used to accident rates achieved during the supply period at EDP.

Pandemic management — COVID-19

Preparation for emergency situations, especially with a focus on the health and protection of people, makes up part of EDP's performance and commitment.

EDP Group's Contingency Plan was created during infectious disease situations and in order to prepare the company for similar or more serious future situations, such as pandemics, and a specific Contingency Plan was implemented for each geography.

This history of continuous monitoring of epidemiological situations through the implementation of Contingency Plans allowed EDP to be more prepared when, in 2020, the COVID-19 Pandemic was declared.

The Contingency Plans define EDP's mode of action for the proper management of impacts around such situations, which may affect employees and service providers, as well as the group companies´ businesses, which includes:

- Safeguarding people's lives in order to reduce the risk of contamination in the workplace, reinforcing the information and knowledge of employees that highlights self-protection
- Activating a structure of decision-making and coordination at EDP and Group companies;
- Activation of Business Continuity Plans in order to ensure an adequate operational response that simultaneously minimises the spread of the pandemic and ensures the functioning of essential services
- Monitoring of the development of disease, the effectiveness of the measures adopted and the need for new measures depending upon EDP´s internal and external context.
- Respond to notification and communication needs, internal and external;
- Resumption of activity in safe conditions, as soon as the country/region allows it.

In view of the data related to the pandemic, the governments of the countries in which EDP operates have established a plan for the gradual lifting of restrictive measures.

The evolution of a vaccination against Covid-19 allowed progress to the easing of restrictions through a gradual and time-extended plan.

EDP followed this plan and, in line with the directives, moved forward with lifting the measures which had been applied in all the countries in which it operates.

Culture programme – Playitsafe

GOAL

Reformulate rules, training and standards in the field of health and safety at work, in order to promote a cultural change in the EDP group.

Integrated into "Changing Tomorrow Now... With You", PlayitSafe" operationalises the "#36 — Zero Accidents Strategy" initiative, with the goals of: i) Reducing occupational accidents and eliminating serious and fatal accidents; ii) Increasing the safety culture of the EDP group and iii) Improving external recognition of EDP's performance in terms of Health and Safety at Work.

PlayitSAFE cuts across the whole group, lasting four years and promoting ongoing improvement in the company and its procedures, with a special focus on accident prevention.

Thus, this project and the underlying work will be carried out around six priority axes essential to the aim of reducing accidents. They are:

- The commitment and involvement of leaders in Prevention and Safety;
- Promotion of safe behaviours and learning from mistakes;
- Digitisation of processes and operations;
- Enhanced Prevention and Safety skills;
- Communication and involvement with Prevention and Safety;
- Management of the procurement chain.

2022 highlights

Developed actions
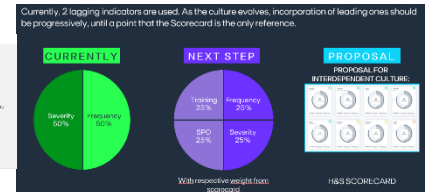
Training for leaders/managers and contract managers

19 coaching sessions with members of the EBD

10 coaching sessions with members of each BU´s Board

2 training modules in gaming format for managers and contract managers

playitSAFE: membros do CA participam em formações sobre segurança

New indicators – Scorecard

19 indicators were determined:

- Lagging – 7
- Leading – 12

New governance model

New committees model

Corporate H&S Committee	=	CAE	+	Corporate H&S		
BU H&S Committee	=	BU CA	+	Corporate H&S	+	BU H&S Team
Operations Committee	=	1st line	+	H&S Team		

The year 2022 was marked by the 1st global meeting between those in charge of the development of the topics of Safety, Security e Business Continuity. The main objectives of the initiative, which took place at the end of the year in Lisbon, were defining the strategy for the next three years, ensuring alignment between the various companies, creating the habit of sharing good practices and promoting a group spirit.

During the meeting, the strategic pillars were worked on: the leaders´ commitment to prevention and safety; behaviours, prevention activities and learning from mistakes; streamlining, digitisation and standardisation of prevention and safety processes within the group; skills; communication and involvement; and management of prevention and safety in the hiring of service providers.

Developed actions

Communication

– Cross-cutting communication plan

– Monthly risk-based communication

– Monthly bulletins with the breakdown of accidents and lessons learned

– Quarterly publication of OHS results
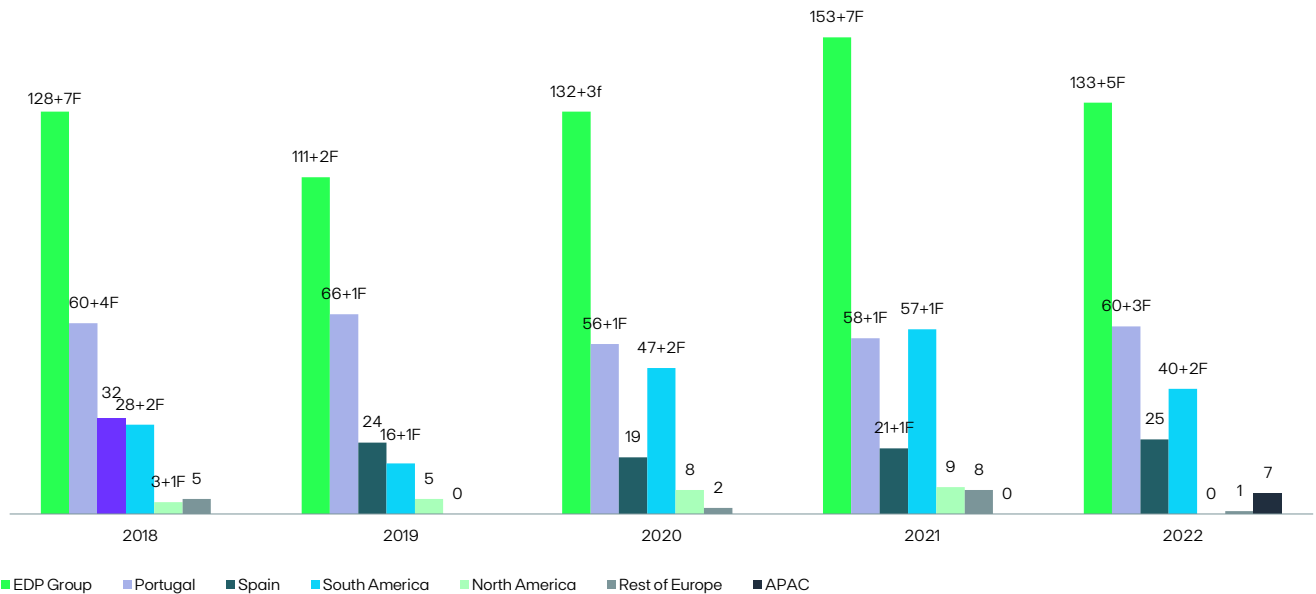
Work-related injuries and diseases

[EU17; EU25; GRI 403-9; GRI 402-10]

In EDP Group, 133 work-related accidents occurred, out of all EDP employees and service providers (ESP), representing a reduction of 13% compared with 2021.I The frequency rate (FR) amongst EDP employees and service providers in 2021 grew 3% compared with the previous year, consequently we were unable to achieve the target of ≥1.69 set for 2022.

In detail, the (FR) of EDP employees increased, 1.13 accidents per million hours worked (+23% compared with 2021) and the (FR) relative to ESP also increased, 2.18 accidents per million hours worked (+4% compared with 2021).

In 2022, there were 5 fatal accidents involving ESPs, 3 in Portugal and 2 in South America (-29% compared with 2021). As a result, the group's total severity index decreased by 9% compared to the previous year.

Accidents in the workplace
(With fall and fatal)

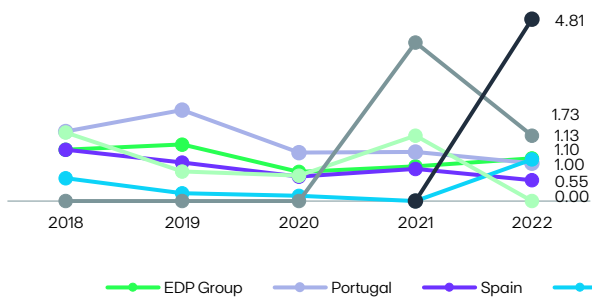|	EDP Group	Portugal	Spain	South America	North America	Rest of Europe	APAC
2018	128+7F	60+4F	32	28+2F	3+1F	5	
2019	111+2F	66+1F	24	16+1F	5	0	
2020	132+3f	56+1F	19	47+2F	8	2	
2021	153+7F	58+1F	21+1F	57+1F	9	8	0
2022	133+5F	60+3F	25	40+2F	0	1	7

F — Fatal Accidents

EDP Group

EDP Group: EDP Employees

Accidents at work and accident rates — summary table:

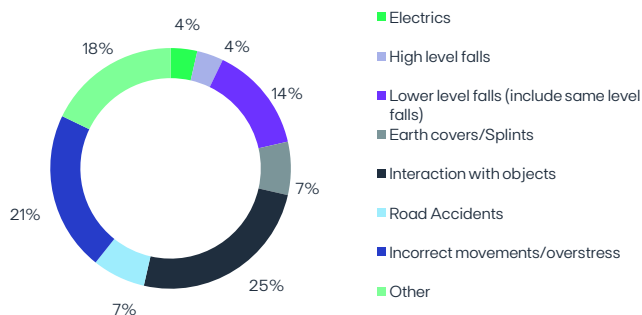| CHANGES IN THE MAIN INDICATORS BY GEOGRAPHY		ACCI-DENTS	ACCIDENTS "WHILST COMMUTING"	FR	IR	SR	TSR	DAYS LOST
EDP Group	2022	28	17+1F	1.13	2.05	65	69	1,594
	2021	21	11	0.92	1.66	69	73	1,567
	Δ	33%	64%	23%	23%	–6%	–5%	2%
Portugal	2022	10	4	1.00	1.68	97	109	971
	2021	13	3	1.30	2.18	110	121	1,095
	Δ	–23%	33%	–23%	–23%	–12%	–10%	–11%
Spain	2022	2	2	0.55	0.96	51	51	188
	2021	3	0	0.85	1.47	31	31	110
	Δ	–33%	>100%	–35%	–35%	65%	65%	71%
South America (EDP BR, EDPR BR, EDPR COL e EDPR CHL)	2022	8	12	1.10	2.21	21	21	155
	2021	0	7	0.00	0.00	0	0	0
	Δ	>100%	71%	>100%	>100%	>100%	>100%	>100%
North America (Canada, USA, Mexico)	2022	0	0	0.00	0.00	120	120	210
	2021	3	0	1.73	3.43	206	206	356
	Δ	–100%	–	–100%	–100%	–42%	–42%	–41%
Rest of Europe (RO, IT, UK, PL, FR, BE, GR e HU)	2022	1	0	1.73	3.13	2	2	1
	2021	2	1	4.19	7.60	13	13	6
	Δ	–50%	–100%	–59%	–59%	–85%	–85%	–83%
APAC (Vietnam and Sin-gapore)	2022	7	0	4,81	10.88	47	47	69
	2021	0	0	0.00	0.00	0	0	0
	Δ	>100%	–	>100%	>100%	>100%	>100%	>100%

F — Fatal Accidents

Fr – Frequency rate
(accidents per million hours worked)

Sr – Severity rate
(days lost per million hours worked)

Legend: ● EDP Group ● Portugal ● Spain ● South America ● North America ● Rest of Europe ● APAC

Types of accidents

- Electrics
- High level falls
- Lower level falls (include same level falls)
- Earth covers/Splints
- Interaction with objects
- Road Accidents
- Incorrect movements/overstress
- Other

Types of injuries

- Contusion, wound
- Contusion and internal injuries
- Closed fracture
- Dislocation, displacement
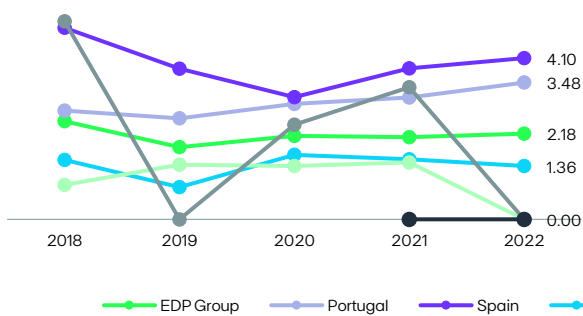- Burning from hot/cold temperatures
- Electric discharge
- Other
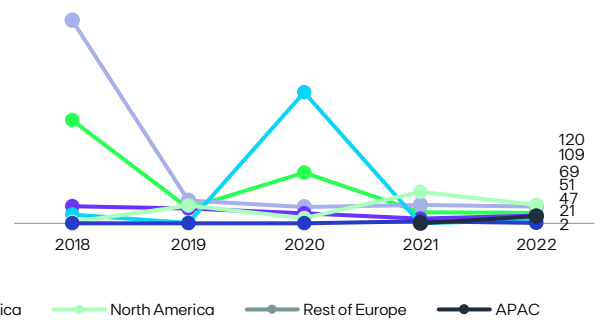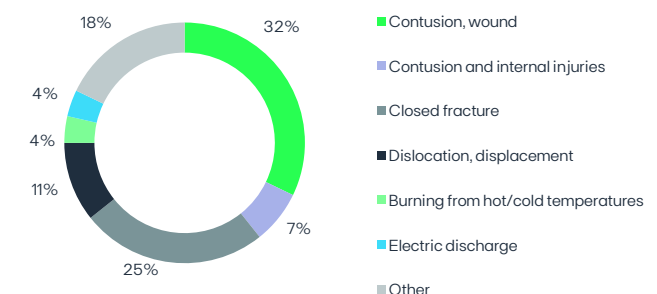
EDP Group: Service providers

Accidents at work and accident rates — summary table:

CHANGES IN THE MAIN INDICATORS BY GEOGRAPHY		ACCIDENTS	FR	IR	SR	TSR	DAYS LOST
EDP Group	2022	105+5F	2.18	4.31	144	749	7,260
	2021	132+7F	2.09	4.14	109	753	7,250
	Δ	−21%	4%	4%	32%	−1%	1%
Portugal	2022	50+3F	3.48	6.88	208	1,412	3,166
	2021	45+1F	3.10	6.13	225	680	3,336
	Δ	15%	12%	12%	−8%	>100%	−5%
Spain	2022	23	4.10	8.10	361	361	2,025
	2021	18+1F	3.84	7.59	221	1,435	1,094
	Δ	21%	7%	7%	63%	−75%	85%
South America (EDP BR, EDPR BR, EDPR COL e EDPR CHL)	2022	32+2F	1.36	2.68	79	566	1,975
	2021	57+5F	1.53	3.01	41	779	1,650
	Δ	−45%	−11%	−11%	93%	−27%	20%
North America (Canada, USA, Mexico)	2022	0	0.00	0.00	0	0	0
	2021	6	1.45	2.87	147	147	605
	Δ	−100%	−100%	−100%	−100%	−100%	−100%
Rest of Europe (RO, IT, UK, PL, FR, BE, GR e HU)	2022	0	0.00	0.00	91	91	94
	2021	6	3.36	6.63	316	326	565
	Δ	−100%	−100%	−100%	−71%	−72%	−83%
APAC (Vietnam and Singapore)	2022	0	0.00	0.00	0	0	0
	2021	0	0.00	0.00	0	0	0
	Δ	–	–	–	–	–	–

F — Fatal accidents

Fr – Frequency rate
(accidents per million hours worked)

Sr – Severtity rate
(days lost per million hours worked)

EDP Group — Portugal — Spain — South America — North America — Rest of Europe — APAC

Types of accidents

- Electrics
- High level falls
- Lower level falls (include same level falls)
- Earth covers/Splints
- Interaction with objects
- Road Accidents
- Incorrect movements/overstress
- Fire/Explosion
- Other

Types of injuries

- Contusion, wound
- Contusion and internal injuries
- Closed fracture
- Dislocation, displacement
- Burning from hot/cold temperatures
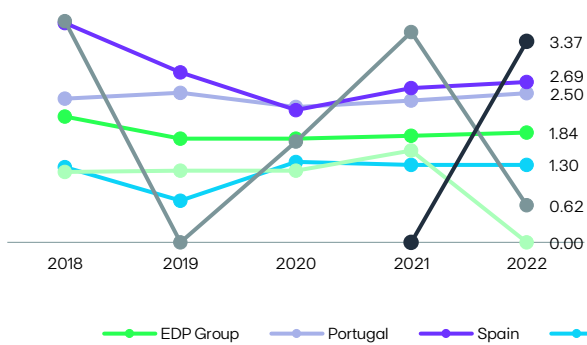- Electric discharge
- Other
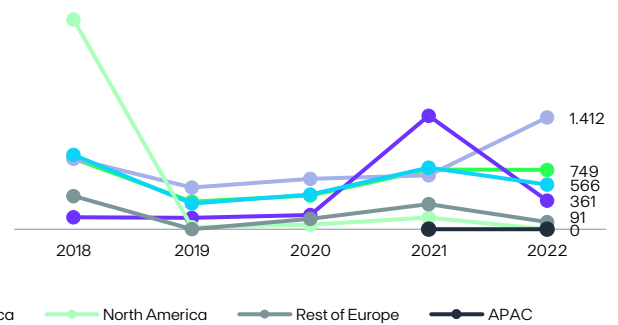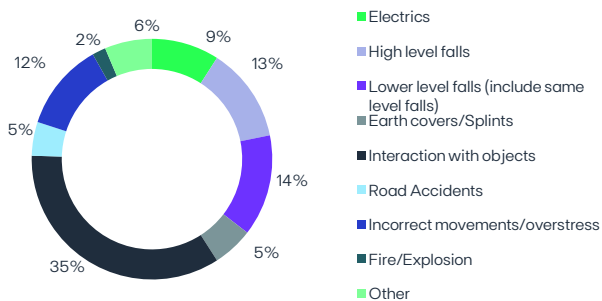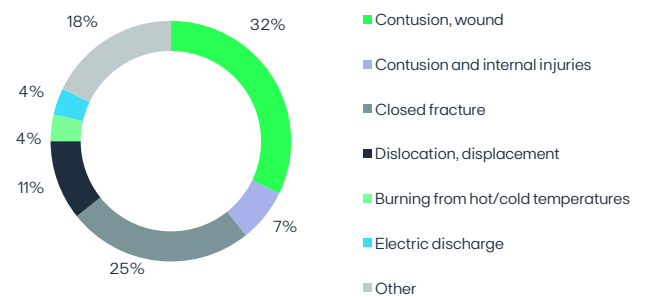
EDP Group: EDP Employees + Service providers

Accidents at work and accident rates — summary table:

CHANGES IN THE MAIN INDICATORS BY GEOGRAPHY		ACCIDENTS	FR	IR	SR	TSR	DAYS LOST
EDP Group	2022	133+5F	1.84	3.52	118	526	8,854
	2021	153+7F	1.79	3.46	99	579	8,800
	Δ	–14%	3%	2%	19%	–9%	1%
Portugal	2022	60+3F	2.50	4.61	164	896	4,137
	2021	58+1F	2.38	4.38	178	455	4.,431
	Δ	7%	5%	5%	–8%	97%	–7%
Spain	2022	25	2.69	5.07	239	239	2,213
	2021	22	2.59	4.84	142	849	1,204
	Δ	14%	4%	5%	68%	–72%	84%
South America (EDP BR, EDPR BR, EDPR COL e EDPR CHL)	2022	40+2F	1.30	2.58	66	443	2,130
	2021	57+5F	1.30	2.57	35	663	1,650
	Δ	–32%	0%	0%	89%	–33%	29%
North America (Canada, USA, Mexico)	2022	0	0.00	0.00	45	45	210
	2021	9	1.54	3.04	164	165	961
	Δ	–100%	–100%	–100%	–73%	–73%	–78%
Rest of Europe (RO, IT, UK, PL, FR, BE, GR e HU)	2022	1	0.62	1.19	59	59	95
	2021	8	3.53	6.85	252	252	571
	Δ	–88%	–82%	–83%	–77%	–77%	–83%
APAC (Vietnam and Sin-gapore)	2022	7	3.37	7.32	33	33	69
	2021	0	0.00	0.00	0	0	0
	Δ	>100%	>100%	>100%	>100%	>100%	>100%

F — Fatal accidents

Fr – Frequency rate
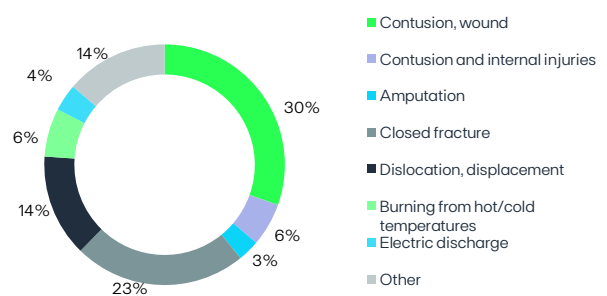(accidents per million hours worked)

Sr – Severity rate
(days lost per million hours worked)

Legend: EDP Group · Portugal · Spain · South America · North America · Rest of Europe · APAC

Types of accidents

- Electrics
- High level falls
- Lower level falls (include same level falls)
- Earth covers/Splints
- Interaction with objects
- Road Accidents
- Incorrect movements/overstress
- Fire/Explosion
- Other

Types of injuries

- Contusion, wound
- Contusion and internal injuries
- Amputation
- Closed fracture
- Dislocation, displacement
- Burning from hot/cold temperatures
- Electric discharge
- Other
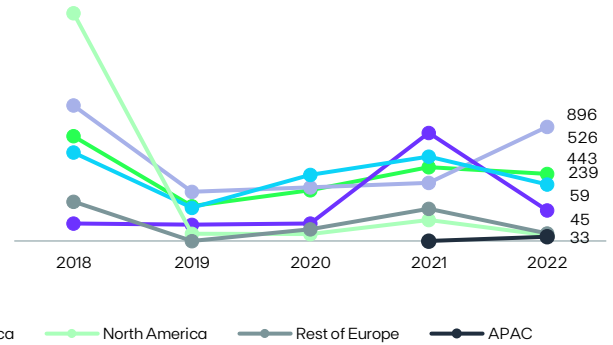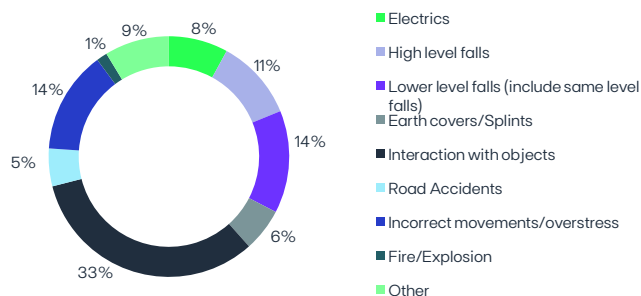
Accidents that happened as a result of interactions with foreign objects and inexact movement are responsible for 46% of accidents with EDP employees, followed by falls at ground level at 14%, 7% of which are due to entanglement, with 33% being other causes.

Where service providers are concerned, interactions with objects are responsible for 35% of their accidents, followed by other falls (at ground level), at 14%, falls from height with 13%, inexact movement at 12% and 26% resulting from other causes.

It should be noted that the risks of occupational accidents include, in addition to those associated with activities carried out on site during work hours, those related to commuting to and from work, as well as journeys and time taken at lunch break.

When we analyse the types of injuries suffered by EDP employees, bruises and wounds represent 32%, closed fractures 25%, sprains and dislocations 11% and 32% resulting from other causes.

Amongst service providers the most frequent injuries are bruises and wounds, which represent 30%, closed fractures 23%, sprains and dislocations 15%, with 32% resulting from other causes.

Affected body parts

The affected body parts, where EDP employees are concerned, are the legs, knees, ankles group 18%, followed by the neck, back and spine 14%, the wrist, hand and fingers group at 14%, the foot and toes 11% and the remaining parts of the body represent 43%. Amongst service providers the parts of the body most affected are the wrist, hand and fingers group at 27%, followed by the leg, knee, ankle at 24%, the foot and toes with 10% and the remaining parts of the body represent 39%.

Affected body parts
(EDP employees + Service providers)

- Head
- Eyes
- Neck, Back, Spine
- Shoulder, Arm, Elbow
- Wrist, Hand, Fingers
- Hips and their joints
- Leg, Knee, ankle
- Foot, Toes
- Multiple parts
- Other parts
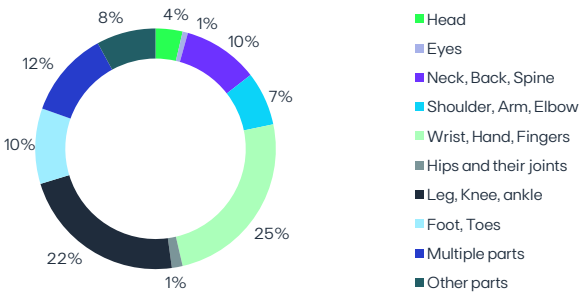
By gender

When analysed by gender, 96% of the accidents occurred amongst males and 4% amongst females, with operational activities representing the greatest risk, which are performed largely by men.

Accidents by gender
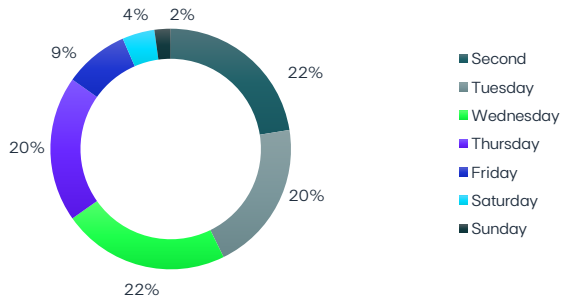(EDP employees + Service providers)

- Female
- Male
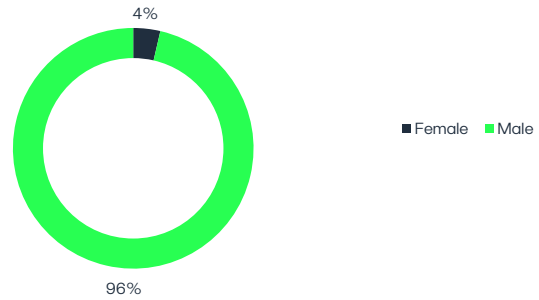
By month and days of the week

During 2022, the months of May, August and November had the highest percentage of accidents, with January, March and September representing the lowest. Monday and Wednesday are the days of the week with the most accidents, 22% each, followed by Tuesday and Thursday with 20% each.

Accidents by month
(EDP employees + Service providers)

- January
- February
- March
- April
- May
- June
- July
- August
- September
- October
- November
- December
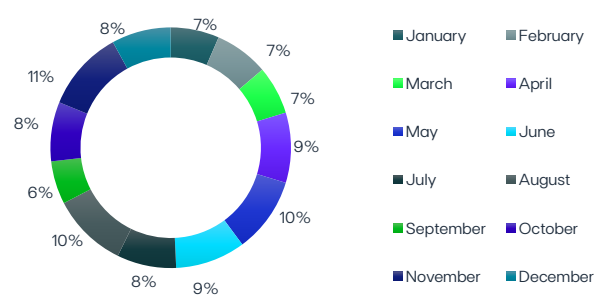
Accidents by day of the week
(EDP employees + Service providers)

- Second
- Tuesday
- Wednesday
- Thursday
- Friday
- Saturday
- Sunday

Mandatory recordable accidents at work

The EDP group has consolidated the indicators for accidents at work that require reporting. Of the 330 accidents that occurred in 2022 (with fall, without fall and fatal), 212 are work-related accidents that must be reported, which is equal to 64% of EDP group's accidents.

Recordable accidents
(EDP employees + Service providers)
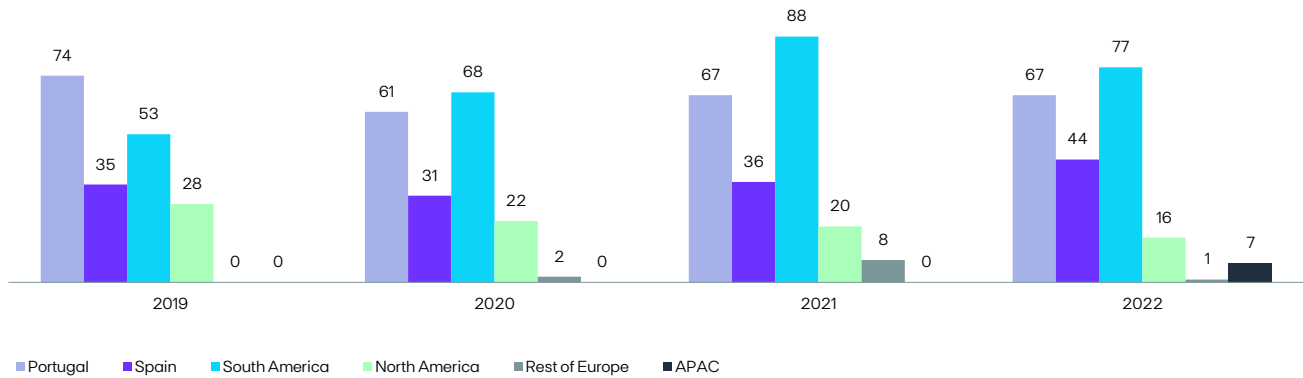
The following table summarizes the numbers of recordable accidents at work:

GEOGRAPHY	EDP EMPLOYEES (#)	SERVICE PROVIDERS (#)
Portugal	12	55
Spain	11	33
South America	13	64
North America	7	9
Rest of Europe	1	0
APAC	7	0
EDP Group	**51**	**161**

Accidents involving third parties

For EDP Group, the issue of public safety is crucial, given its impact on people's lives. Minimising the risks associated with the use of electricity ultimately depends on individual education and behaviour. As such, EDP identifies and communicates the risks associated with its facilities and equipment. However, in 2022, there were 41 electrical accidents involving third parties (non-EDP persons) in EDP group's facilities or equipment, resulting in the death of 14 people. These accidents were the result of civil construction activities, tampering with the grid, leisure, and so on.

Brief description of fatal accidents in EDP Group

The 5 fatal accidents that involved external service providers, 3 in Portugal, 1 in Spain and 2 in South America, resulted from falls from height, vehicle movement, interaction with objects, electrical cause and violence. Fatal accidents resulting largely from operation and maintenance activities.

Accidents in the workplace

Fall from height

When two employees were inside a basket suspended by a gantry crane, the said basket fell from a height of approximately 18m, causing the death of both employees.

Fall from height

During work to tighten the bolts of the T2/T3 frames, the employee fell through the ladder access hatch. During the fall, the employee hit the ladder´s magnetic support, fell into the lift pit at the base of T1 and ended up at the base of T0 (on the right side of the entrance door to the wind turbine).

Electrical cause

During the connection of a conductor, an arc flash which struck the employee occurred, causing his death.

Electrical cause

Three employees carried out the planting of LV pole one, using a heavy vehicle with a crane, under the 15 kV live conductors of FR 15-47 LMT. It is assumed that when the casualty was lining up the bottom of the pole for the pit, the "head" of the pole touched the live LMT, causing the employee to be electrocuted.

Acidentes In-Itinere

Road accident

On his way back from the work site, the employee was involved in a car accident between his service vehicle and a truck.

EDP + ESP fatal accidents at work
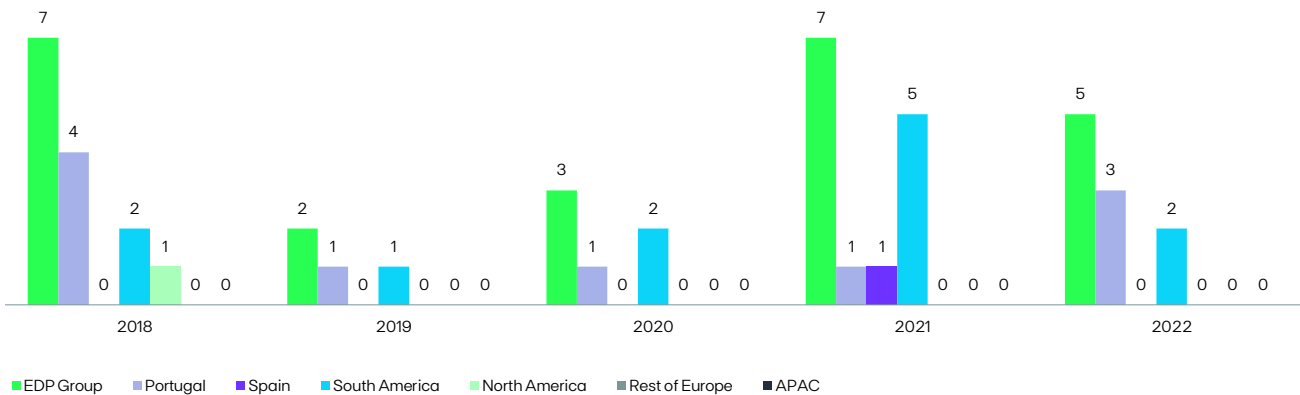
Near-misses and hazardous situations

For EDP Group, the awareness, analysis and correction of near-misses are essential tools needed to achieve the goal of risk and personal injury reduction in EDP Group's operations.

471 near-misses were reported (Portugal 135, Spain 85, South America 107, North America 125, Rest of Europe 19 and APAC 0). In 2021, in the same period, 565 incidents were reported.

The number of incidents reported remains low relative to the number of accidents involving injury.
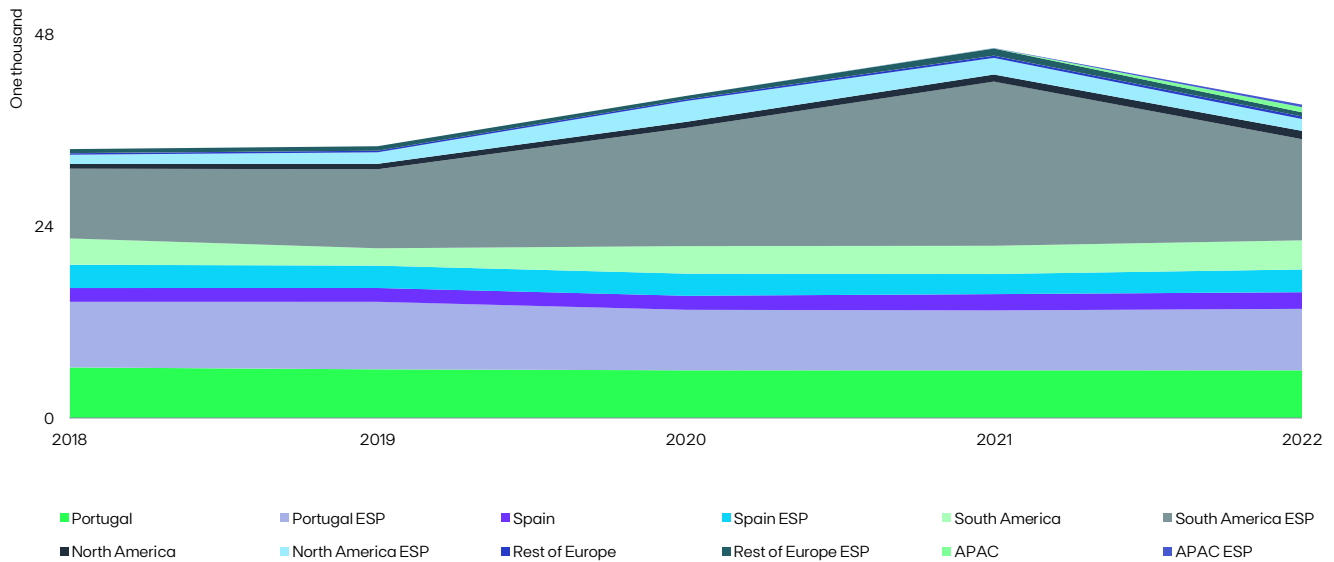
Near-misses and hazardous situations
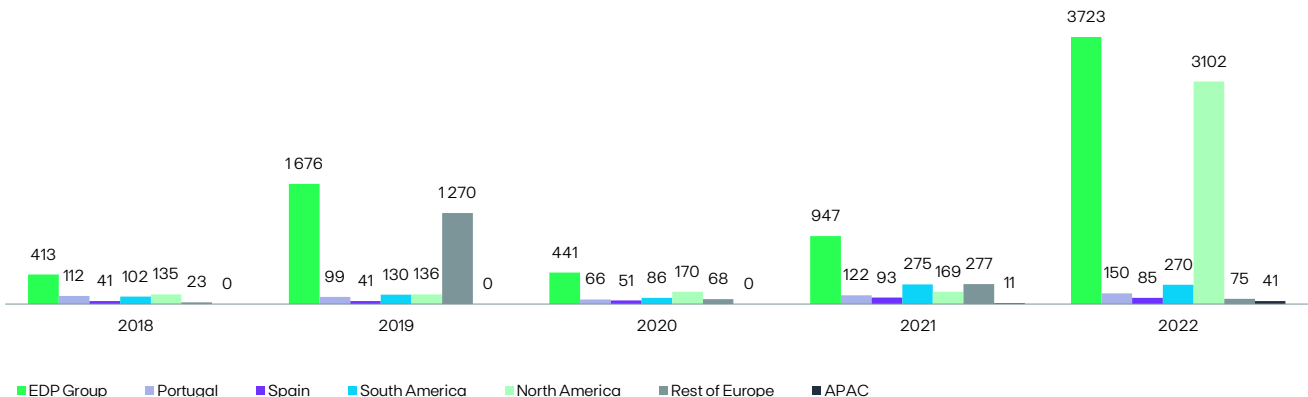
Average number of employees

The following graph represents the equivalent workforce (EWF) in the EDP Group, with the ESP values calculated from the number of hours worked, in light of the hours worked in EDP.

The reduction of internal staff numbers and the increasing outsourcing of highly operational activities created new challenges in terms of Occupational Health and Safety in EDP Group.

For this reason, EDP Group ensures that its Service Providers comply with the management systems and are aligned with the Group's internal policies.

Effective average

Legend: Portugal, Portugal ESP, Spain, Spain ESP, South America, South America ESP, North America, North America ESP, Rest of Europe, Rest of Europe ESP, APAC, APAC ESP

The following table summarises the workforce by EDP Employee and Service Providers:

GEOGRAPHY	EDP EMPLOYEES (#)	ESP (#)
Portugal	5,960	7,699
Spain	2,092	2,839
South America	3,617	12,684
North America	1,037	1,484
Rest of Europe	320	522
APAC	643	314
EDP Group	**13,669**	**25,542**

Benchmarking — frequency rate

Employees

Legend: EDP Group — IBERDROLA Group — EDF Group — ENEL Group — NATURGY Group

Data labels: 1.70, 1.13, 1.02, 0.67, 0.58

Service providers

Legend: EDP Group ESP — IBERDROLA Group ESP — EDF Group ESP — ENEL Group ESP — NATURGY Group ESP

Data labels: 2.60, 2.18, 1.55, 1.51, 0.64
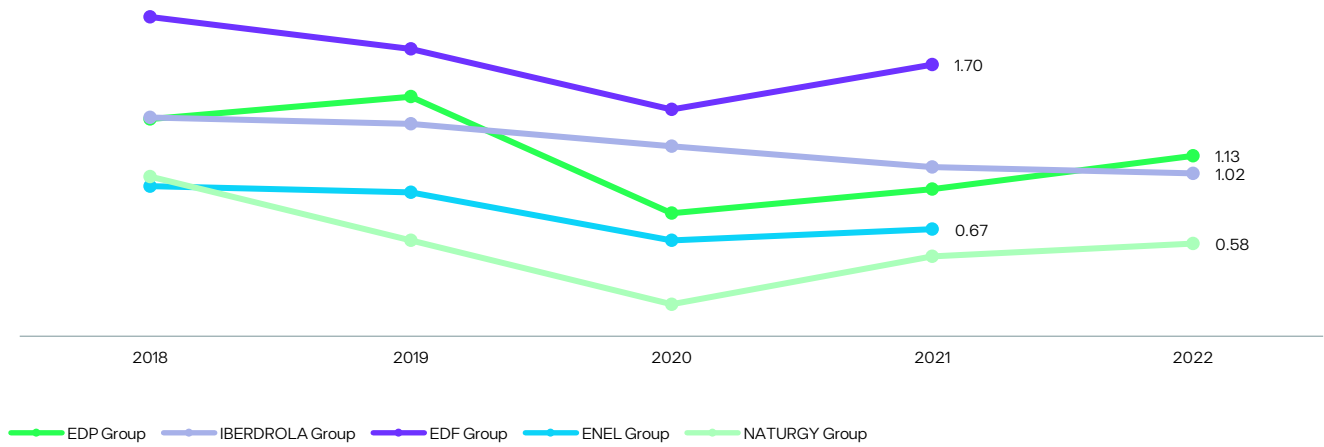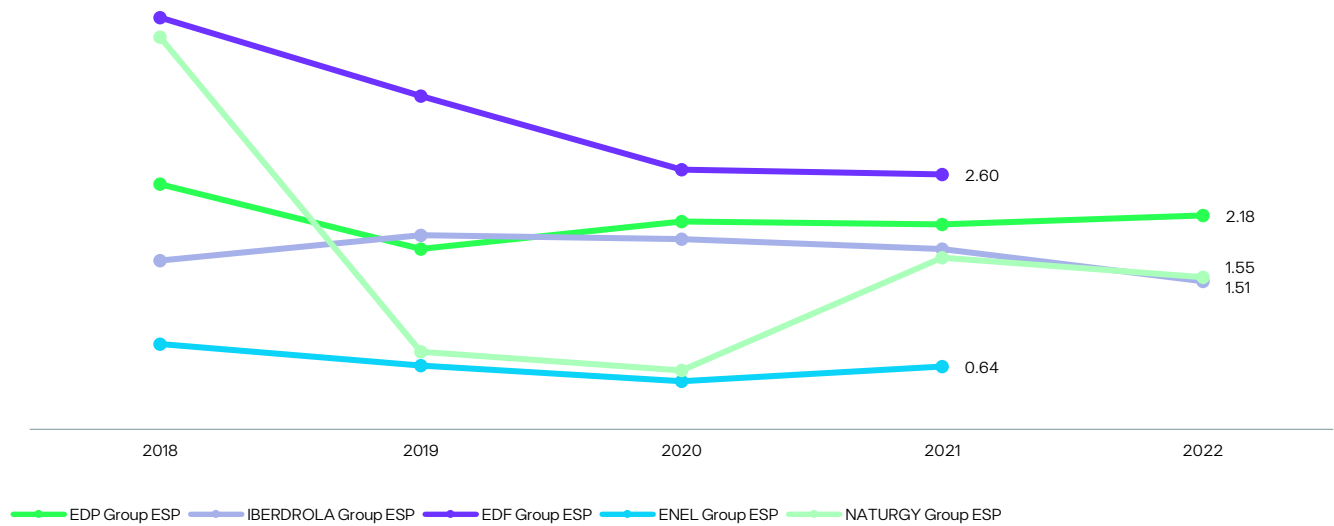
EDP Group Supplementary information

[EU17; EU25; GRI 403.9; GRI 403-10]

	UN	2022	2021	Δ
EDP EMPLOYEES				
In-service accidents at work				
Accidents resulting in absence	#	28	21	33%
Fatal accidents	#	0	0	–
Accidents with serious consequences	#	0	2	–100%
Mandatory recordable accidents	#	51	32	59%
Total days lost in the period	#	1,594	1,567	2%
Hours worked	#	24,673.057	22,832.738	8%
Indicators (accidents at work)				
Frequency (FR)	(i)	1.13	0.92	23%
Severe Frequency (SFR)	(i)	0.00	0.09	–100%
Mandatory recording frequency (TFR)	(i)	2.07	1.40	48%
Fatal Frequency (FFR)	(i)	0.00	0.00	–
Severity (SR)	(i)	65	69	–6%
Total severity (TSR)	(i)	69	73	–5%
SERVICE PROVIDERS				
In-service accidents at work				
Accidents resulting in absence	#	105	132	–20%
Fatal accidents	#	5	7	–29%
Accidents with serious consequences	#	10	9	11%
Mandatory recordable accidents	#	161	187	–14%
Total days lost in the period	#	7,260	7,250	0%
Hours worked	#	50,470.660	66,388.297	–24%
Indicators (accidents at work)				
Frequency (FR)	(i)	2.18	2.09	4%
Severe Frequency (SFR)	(i)	0.20	0.14	43%
Mandatory recording frequency (TFR)	(i)	3.19	2.82	13%
Fatal Frequency (FFR)	(i)	0.10	0.11	–6%
Severity (SR)	(i)	144	109	32%
Total severity (TSR)	(i)	749	753	–1%
EDP EMPLOYEES + ESP				
In-service accidents at work				
Accidents resulting in absence	#	133	153	–13%
Fatal accidents	#	5	7	–29%
Accidents with serious consequences	#	10	11	–9%
Mandatory recordable accidents	#	212	219	–3%
Total days lost in the period	#	8,854	8,800	1%
Hours worked	#	75,143.716	89,221.035	–16%
Indicators (accidents at work)				
Frequency (FR)	(i)	1.84	1.79	3%
Severe Frequency (SFR)	(i)	0.13	0.12	8%
Mandatory recording frequency (TFR)	(i)	2.82	2.45	15%
Fatal Frequency (FFR)	(i)	0.07	0.08	–10%
Severity (SR)	(i)	118	99	19%
Total severity (TSR)	(i)	526	579	–9%
NEAR-MISSES	#	471	565	–17%
ELECTRICAL ACCIDENTS WITH THIRD PARTIES	#	14	18	–22%

Sharing best practice within EDP group

Sharing experiences and information on the most relevant projects in Occupational Health and Safety issues between EDP group companies and geographical areas is an important tool for enhancing a widespread, cross-cutting adoption of existing best practice.

Occupational Health and Safety is regarded as materially relevant as it directly affects the creation of value for EDP Group. Hence, comprehensive corporate actions, which encompass all geographical areas, are identified and addressed every year, with the aim of:

- Reducing accidents involving ESP workers;
- Improving service efficiency and quality with an impact on cost reduction;
- Improving working conditions that impact on the reduction of accidents and absenteeism;
- Complying with legal requirements.

The following are some of the projects and initiatives developed in 2022:

E-Redes

Communication Campaign: Safety Tips

Of particular note in 2022 is the OHS communication campaign carried out with the dissemination of weekly safety tips at E-REDES and for ESP, with the placement of stickers with safety messages on buildings and on employees' helmets, and with the installation in buildings of the panels "My commitment to life", with the aim of challenging employees to illustrate what makes them get home safely every day and "Last accident day", with the aim of disclosing the date of the latest accident with casualties and reinforcing the company's goal, "zero accidents".

EDP Renewables Poland

Alcohol Abuse Prevention and Control Campaign

A campaign for the prevention and control of alcohol abuse was put in place at all EDP R facilities. To reinforce the campaign message, posters have been developed with the information necessary for the procedure to be followed in case of suspicion of: (1) alcohol consumption or (2) under the influence of alcohol.
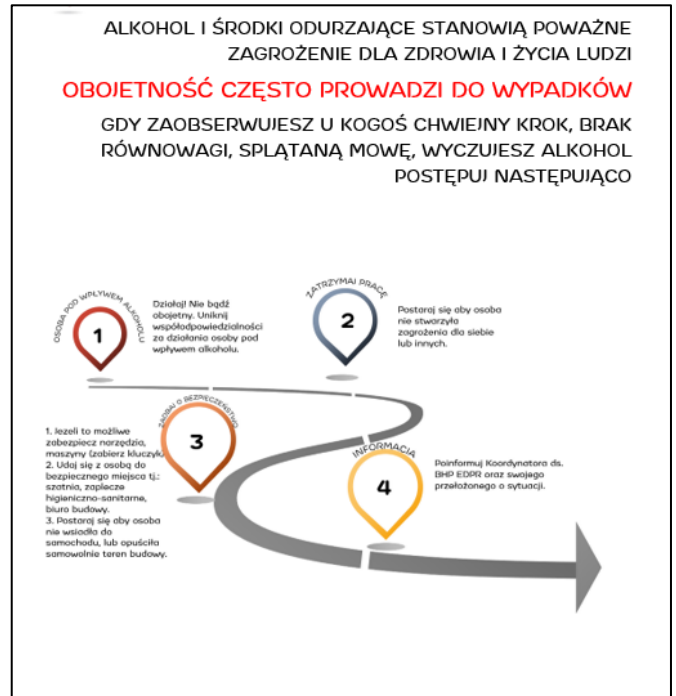
EDP Renewables Vietnam

Drill

Xuan Thien SPV and CMX SPV, in coordination with Ninh Thuan ("fire police"), carried out a drill with a fire scene in the substation and office area, leading to the evacuation of all employees.

EDP Produção

Concentric run test at Pocinho hydroelectric power plant

Pocinho Group 1 manifested vibrations outside of the normal range, so it was necessary to perform a diagnosis to determine the root cause. As a result of this anomaly, it was decided that it would be necessary to perform the concentric run manoeuvre to identify any group unevenness or misalignment of the shafts.

For the execution of this test by the management teams, a careful work plan was made, the drawings were analysed, the various phases/activities of the test, equipment necessary and people responsible for the work fronts were defined. In order to ensure that all safety measures were in place before work started, a risk assessment was carried out for all activities and the preventive and emergency measures to be adopted during the test were determined. After organising the work fronts and installing the equipment, issuing work permits, completing the LMRA and presenting the risk assessment to the team, the Concentric Run test was begun.

EDP Global Solutions

Fire safety management model for buildings (SCIE)

To support SCIE management, EDP Global Solutions has implemented a SCIE management model that aims to clarify the scope of action, identifying the main areas/activities associated with service provision and respective stakeholders.

In order to support the management of the topic, a dashboard was also developed to provide the following information:

a. Building characteristics;
b. MAP (Self-Protection Measures) document management;
c. Frequency and status of regular drills and inspections (legal requirements);
d. Security team (person in charge and security delegate – RS and DS)
e. SCIE contract management / framework agreement.

EDP Renewables France and Belgium

Good practice sharing

During 2022, new communication campaigns were implemented with the objective of informing and sharing new procedures/information and OHS best practice, carrying out the reinforcement of the safety culture at EDPR Fr&Bl.

a. Abandonment of imminent danger and high-risk situations: regulation and implementation of incident recording;
b. Procedures: visits/access management and events at the premises;
c. Ergonomics in teleworking: ensuring safe conditions for working from home;

Our energy

Our
Security

2

Security

The EDP Group considers security management to be a strategic function with the aim of adequately protecting people and its value chain, physical and technological resources, in the face of an increasingly wide range of increasingly complex threats.

The diversity of business activity – generation (conventional and renewable), transport, distribution, trading and commercialisation – supported by shared services (corporate and at units established for the purpose) – leads to increased complexity in the management of asset security where characteristics, vulnerabilities, criticality and protection requirements vary.

The geographical distribution of EDP business also raises increased challenges by exposing local people, assets and operations to distinct threats, the knowledge and monitoring of which are critical to a prompt and effective response to changes in the local and global risk ecosystem.

The creation of the Safety, Security & Business Continuity Unit reflects the strategic importance of these issues, allowing an integrated vision of them and the achievement of synergies, resulting in an increase in EDP's resilience.

The creation of a corporate division with responsibility for the cross-cutting management of Security, in strict alignment with the Business Units (BU), Shared Services Units (SP) and other departments of the Corporate Centre (CC), reflects the relevance of this issue for EDP, allowing the consolidation of shared guidelines and strategies.

In this context, the main functions and objectives of the Security & Business Continuity area are:

a. The definition and maintenance of security policies and procedures in conjunction with the different BU, SP and CC departments, aligned with the legal and regulatory regulations in force, and their implementation;
b. The promotion of the identification and analysis of security risks, together with the BU, SP and CC departments, and the adoption of security measures adequate to their management;
c. The development of a security culture across the entire EDP Group, by establishing appropriate training and awareness-raising plans;
d. The promotion of plans and protocols with a view to protecting expatriate employees, travelling/relocating employees and senior management of the EDP group;
e. The determination and operationalisation of intelligence models in order to identify, prevent and mitigate security risks; and
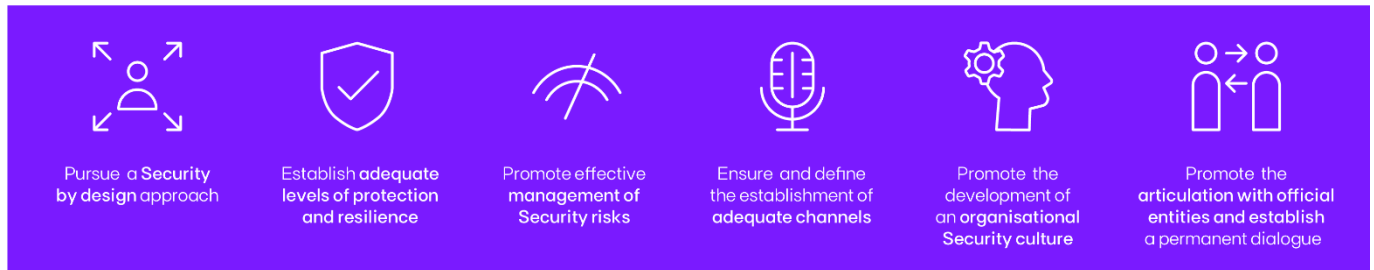f. The establishment and monitoring of relevant security measures and indicators, and reporting on them.

The EDP group´s Security Policy

Developed by SSBC in 2022, in close collaboration with the BUs, SPs and CC departments with operational functions, the EDP group Security Policy (OS 8/2022/CAE), defines and formalises the EBD´s strategic guidelines at this level, establishing the principles and attributions in matters of security.

With a view to developing mechanisms for the prevention, detection and mitigation of potential threats within the scope of Security, the EDP Group's Security Policy establishes the following guiding principles:

- Pursue a security by design approach in the decision-making process and at the different management levels;
- Establish adequate levels of protection and resilience to mitigate the impact of adverse events, following the adoption of international best practice and appropriate security management initiatives;
- To promote the effective management of security risks, by carrying out assessments allowing the identification of adequate measures to minimise them, the recording and reporting of incidents and relevant events, and the systematic monitoring of the application of protection requirements implemented, in compliance with the legislation and regulations applicable in each geographical area where the EDP Group operates;
- To guarantee and determine the establishment of appropriate channels for obtaining internal and external information that allows the timely adoption of measures to prevent security risks;
- Promote the development of an organisational security culture through raising awareness, education and training of employees and external bodies, namely business partners, for the role to be played by all in the pursuit of security objectives;
- Promote liaison with competent official bodies, fostering the sharing of security best practice and proximity of action, thus contributing to the safeguarding of society;
- To establish an ongoing dialogue with communities, governments and key security stakeholders, acting in an ethical and responsible manner.

Adopted principles

Pursue a **Security by design** approach

Establish **adequate levels of protection and resilience**

Promote effective **management of Security risks**

Ensure and define the establishment of **adequate channels**

Promote the development of an **organisational Security culture**

Promote the **articulation with official entities and establish a permanent dialogue**

OS 8/2022 CAE — EDP Group Security Policy

The Security Policy is applicable to all the companies that make up the EDP group, and the operational management of the security measures remains under the responsibility of the various BUs, the SP and the relevant departments of the CC.

Security during 2022

The year 2022 saw the creation of the Security & Business Continuity division in SSBC, for which a set of objectives was defined and proposed, translated into concrete actions, and in turn translated into a plan with a view to establishing the foundations of the holistic and integrated management of Security at EDP.

Along with the determination and approval of the EDP group's Security Policy, the practice of holding regular alignment meetings between the SSBC and the BU, SP and the CC departments security teams was adopted as a measure to promote cooperation, exchange of experience and sharing of initiatives and projects, as well as of verified occurrences and incidents. This forum, which is collaborative and mainly operational in nature, has allowed for greater and better understanding of the main challenges and constraints faced by the various BUs, SPs and departments of the CC, as well as of the security controls and practices adopted to deal with them.

Citadel Project

The Citadel Project arose from the need to deepen knowledge about risks and the maturity of security management in the various BUs, SPs and departments of the CC, and in the various countries where the EDP group operates, in order to enable the identification of weaknesses, opportunities for improvement and the main risks and threats, as well as flag up and document the security measures and controls – procedural, technological and human – that have been successfully adopted and that can be disseminated as reference practices in EDP.

Thus, the main objectives of this project included, among others:

a. Obtaining an overview of the main vulnerabilities, threats and risks by infrastructure/asset type, also considering the geographical context;

b. The identification of the current means of prevention and mitigation of these risks, and their suitability to EDP's needs in terms of security;

c. The recommendation of additional or complementary security measures should be considered, and in what contexts;

d. The analysis and proposal of the governance model for security management that best suits EDP in reality;

e. The development and/or improvement of internal processes for the identification, analysis and treatment of security risks and;

f. The identification of solutions to support effective security management in terms of monitoring and reporting on the main threats and risks to which EDP is exposed (e.g. security threat intelligence).

The results of this project, currently being concluded, will support the determination and adoption of security measures adjusted to the local *status quo*, respecting the global context, with the participation of the most representative EDP Group companies in terms of assets, physical infrastructures and personal risk.

Development of the security culture

The human factor is considered a determining factor for the successful adoption of security practices and controls – procedural and technological. Thus, it is essential to ensure:

a. an adequate knowledge and follow-up/use of these practices and controls, contributing to the reduction of possible weaknesses/exposure to threats.

b. the ability to detect and communicate potential threats and risks, ensuring a faster and more targeted response, and reducing the negative consequences that could arise from them, including for your safety, colleagues and third parties.

The development of a Security culture is a fundamental aspect for achieving EDP's objectives in this area, and for increasing the protection of its people and assets.

With a focus on establishing and developing the security culture, EDP promoted a set of awareness-raising actions during 2022, provided by SIS – Security Information Service, namely on:

- The Knowledge and Sensitive Information Protection Programme, which aims to alert entities in Portugal to espionage threats and raise awareness of the importance of protecting knowledge and sensitive information; and
- The Krítica programme aims to contribute to the improvement of the protection of critical infrastructures and sensitive national points against the terrorist threat.

The six awareness-raising activities carried out during 2022 had around 140 participants in Portugal, Spain and Brazil, having received largely positive feedback, with recognition of the relevance of the content shared.

Security perspectives for 2023

The year 2023 will be a year of consolidation for the security management framework at the EDP Group level, in order to implement the guidelines and principles defined in the Security Policy, also including the design and implementation of security controls and measures emanating from the Citadel project.

It is worth highlighting the goal of continuing to develop and improve the EDP Group's capacity to identify and correct security vulnerabilities, and to monitor, anticipate and respond to external threats at this level by strengthening its analytical capacity, supported by intelligence practices and resources appropriate to this theme.

The focus on standardisation of cross-cutting processes, supported by common tools, with the aim of supporting the BU security teams, SPs and CC departments in the daily management of operations, vulnerabilities and security incidents, is recognised as one of the pillars of security development at EDP, and initiatives are planned in this respect.

Assuming the development of a robust security culture as critical to the pursuit of the aims of the EDP group security, the security training and awareness programme will be established during 2023, in a first phase focused on raising awareness, which will evolve into directed initiatives appropriate for different target audiences, according to the nature of their functions.

Our drive

Our Business Continuity and Crisis Management

3

Business Continuity & Crisis Management

The management of Business Continuity has, for several years, assumed a growing relevance in a global context marked by instability and disruptions of various natures and dimensions. The ability adequately to respond to and recover from these disruptions, limiting their negative impacts, ensuring the well-being of people and the pursuit of EDP's objectives through the continuity of its most critical and priority operations, is decisive for its resilience and sustainability, adding value to its stakeholders.

On the other hand, the multiplicity of adverse situations that EDP may face as a result of its global positioning has led it to assume Crisis Management as a strategic capacity that enhances its supported and sustainable response to anomalous situations, marked by high uncertainty and with potential negative impact on its strategic and business commitments and objectives, and which require urgent attention and action to protect the life and physical integrity of people, the environment, the assets and reputation of the EDP group.

The mission of the Security & Business Continuity area of SSBC is to support the EBD in Business Continuity Management and Crisis Management at a cross-cutting level, supporting the BU, SP and CC departments in the adoption of their respective policies and associated practices.

Thus, with regard to Business Continuity and Crisis Management, SSBC maintains as its objectives:

a. The development, maintenance and implementation of the Business Continuity Policy and Crisis Management Policy, supporting the BUs, SPs and CC departments in this regard;
b. The promotion, support and monitoring of the implementation of the methodology for managing EDP group business continuity, together with the BUs, SPs and departments of the CC;
c. The dissemination of best practice in these areas, supporting the development of relevant skills;
d. The determination and monitoring of relevant metrics and indicators, promoting regular reporting to the relevant stakeholders;
e. The promotion and monitoring of the BUs, SPs and CC departments in the design and implementation of exercise programmes with a view to improving the plans and structures for responding to disruptions, crisis and pre-crisis situations; and
f. The fostering of a culture of resilience, Business Continuity and crisis management through appropriate training and awareness initiatives,

promoting the involvement of relevant internal and external stakeholders.

EDP bases its activities on the international benchmarks that oversee Business Continuity Management, especially the ISO 2230:2002 family, having established a cross-cutting governance model and application methodology in 2018 (OS 1/2018/CAE, of 27 February), also covering the principles and guidelines for Crisis Management (in alignment with the BS 11200:2014 reference[1]).

A OS 1/2018/CAE — *Crisis Management and Business Continuity: Responsibilities, Policy and Methodology* addresses the EDP group's commitment to these issues, establishing management structures at strategic, tactical and operational levels, and their respective responsibilities, scope and guiding principles, methodological approach and, in the case of crisis management, guidance on criteria for escalation and communication.

[1] Recently replaced by ISO 22361:2022 – Security and resilience — Crisis management

Business Continuity Policy

Business Continuity, as defined in ISO 22301:2019, constitutes the "*ability of an organisation to continue to deliver products and services, within an acceptable time frame, at a predefined capacity, during a disruption*".
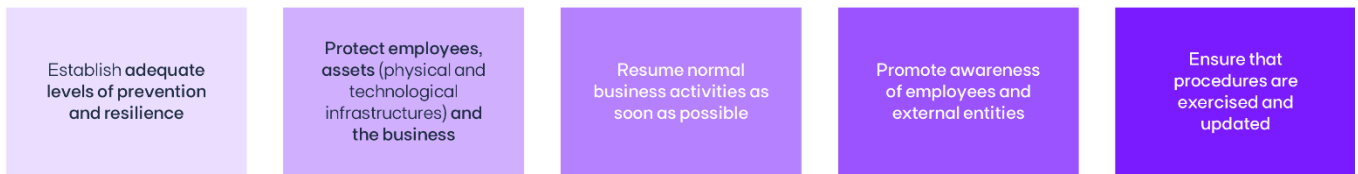
The EDP Group's Business Continuity Management Policy was determined and adopted with a view to managing its level of exposure to conditions that may result in disruption with an impact on the pursuit of its business objectives – at strategic, tactical and operational levels – providing it with the capacity to anticipate such situations, develop appropriate detection mechanisms and response and recovery strategies for its most critical and priority business processes, managing the operational, financial and reputational impacts resulting from them.

This policy is thus based on five fundamental principles:

a. Establish adequate levels of prevention and resilience in the highest priority activities to mitigate the impact of disaster or other sources of disruption through the implementation and maintenance, according to international best practice, of Business Continuity Management;
b. Protect employees, assets (physical and technological infrastructures) and the business in the event of disruption, and support the return of priority activities and their support functions within a predefined period, establishing procedures for action and communication, documented in the Management of Business Continuity;

c. Resume normal business activities as soon as possible to meet strategic, operational, contractual, legal and regulatory demands;
d. Promote awareness among employees and external entities, namely business partners, of the role to be played by all in Business Continuity Management;

e. To ensure that the procedures included in the management of Business Continuity are exercised and updated periodically, with a view to their ongoing improvement and alignment with the EDP group strategy.

Business continuity policy

| Establish **adequate levels of prevention and resilience** | Protect employees, assets (physical and technological infrastructures) and the business | Resume normal business activities as soon as possible | Promote awareness of employees and external entities | Ensure that procedures are exercised and updated |

OS 1/2018 CAE – Crisis and Business Continuity Management

Methodologically, the approach adopted by the EDP group aligns with the requirements established in ISO 22301:2019, ensuring a determination of Business Continuity strategies and plans/procedures supported by robust analysis of disruption situations´ impacts on the Business (BIA – Business Impact Analysis), considering different time intervals as well as in analysis and evaluation of the risk associated with the processes identified in BIA as being of the highest priority.

Both the analysis and planning phases (strategy design and plan/procedure development) consider four types of resources whose unavailability or limited availability result in disruptive scenarios whose response should be planned: People, Physical Infrastructures (including equipment), Technological Infrastructures (IT, OT and associated or complementary services) and suppliers (internal and/or external to the EDP group).

Critical to the success of Business Continuity planning is the carrying out of exercises or drills to confirm the suitability of the plans and procedures developed, as well as to train and empower the teams involved in their activation to act more quickly and in line with established practices. In addition, the determination of metrics and indicators with a view to the regular monitoring of the Business Continuity Management System´s various components will allow an evaluation of its success and progress, with a view to its ongoing improvement.

The multiplicity and complexity of the EDP group's activities led to the design and adoption of a semi-decentralised governance model, with the SSBC having the function of defining and guiding methodologies, monitoring the implementation and maintenance of the BCMS (Business Continuity Management System) of the BU, SP and CC departments, as well as improving the practices adopted, reporting to EBD, promotion of the topic at group level, contributing to the development of a culture of resilience, and

collaboration with national and international reference organisations.

EDP Group's Crisis Management Policy

Crisis Management is the "strategic capacity to manage an abnormal and unstable situation that threatens the strategic goals, viability or reputation of an organization".

Recognising Crisis Management as a fundamental capacity effectively to minimise any impacts and negative consequences that may arise from crisis situations or potential crisis, the EDP group formalised its Crisis Management Plan and Crisis Communication Plan (OS 4/2021/CAE – Crisis Management Policy) in 2021, determined in line with BS 11200:2014 as reference[2].

Crisis Management is assumed by EDP as a strategic activity which permits the company to anticipate and manage the impacts of serious anomalous situations characterised by high levels of uncertainty.

The crisis management plan, of a markedly strategic nature and cross-cutting the EDP group, defines guidelines, strategies, structures and pre-defined formal escalation channels, enhancing the ability to collect, process and structure information in a transparent and appropriate way for decision making, especially in challenging circumstances characterized by a high degree of uncertainty.

In turn, the crisis communication plan establishes the features and guidelines for the operationalisation of a fundamental component of crisis management – effective communication, which ensures the delivery of transparent, consistent and coherent messages, in a timely manner and to the right internal

and external target audiences, using the most appropriate means and channels, about the actions developed by the EDP group for crisis management.

Crisis management at the EDP group foresees the existence of four phases, namely:

- Preparation/prevention phase: business-as-usual situation, during which activities for crisis management are planned, with the goal of reducing the probability of negative consequences for the organisation in the event of a crisis or potential crisis situation; Regular activities include awareness-raising actions, promotion of crisis management exercises and drills, and review/update of plans and structures to reflect improvements;
- Pre-crisis phase: an unstable situation of potential crisis with anticipated negative impact, during which actions are developed to monitor the situation and contain and/or minimise possible negative consequences for the EDP group. This situation can develop into a crisis situation; however, a crisis situation may also arise without a pre-crisis situation;
- Resonse (to crisis) phase: a crisis situation in which actions are put in place to deal with actual need and their consequence, including crisis communication, coordination by the EDP group´s crisis management office;
- Improvement phase (post-crisis): situation of return to business-as-usual state (or other desired state), after a crisis situation, which includes the analysis of lessons learned and the implementation of improvement opportunities identified.

The BU, SP and CC departments with operational capacity have been developing and/or adapting their management and communication plans in crisis in order to ensure they are in line with EDP group plans, formulating channels and the escalation process for this purpose.

[2] Recently substituted by ISO 22361:2022 – Security and resilience — Crisis management

Business Continuity & Crisis Management during the year 2022

During 2022, the focus of Business Continuity was the consolidation of Business Continuity management practices and support for the BU, SP and CC departments that were implementing for the first time, or revising, their BCMS.

It is worth mentioning the significant step taken towards strengthening the capacity of SSBC and the teams in the analysis, planning, operationalisation and monitoring of Business Continuity, taking on the search for a digital solution that allows for the optimisation of effort and resources involved in these activities. In the procurement phase, this solution takes as its main aim the support of the management and improvement of the BCMS, in accordance with the ED group´s

BC methodology, enabling the teams to ensure that the processes established in this context are carried out. Being a complex process, a pilot will first be carried out with the direct involvement of 3 teams (including SSBC), during 2023, with the subsequent, progressive integration of the other BU, SP and relevant CC departments, in dedicated streams.

Russian-Ukrainian conflict

The Russian-Ukrainian conflict marked the year 2022 and the activity of the Security & Business Continuity area in the field of crisis management, leading to the activation of additional means for tracking and monitoring the development and impact of this conflict on the EDP group, in accordance with prior action in the crisis management plan for the pre-crisis situation.

Starting intensive monitoring of this situation´s development, a monitoring group was established that includes various departments of EDP, S.A.´s corporate centre and the Business Units, especially those that have a presence in the region. This monitoring is carried out at the level of topics such as the physical security of people and assets, cybersecurity, Business Continuity, risk management, supply chain, energy management, finance, regulation and stakeholders, compliance, communication and social support.

This monitoring group, under the coordination of the SSBC, meets regularly and is responsible for ensuring reporting to the EBD regarding the main risks existing at any given time, changes in the environment and the state of implementation of the defined risk management measures, as well as measures proposed for adoption

The presence of EDP Renewables and, more recently, EDP Comercial, in countries bordering the conflict zone has led to the adoption of a set of immediate measures aimed at safeguarding their people in these regions and the people of the EDP group originating in Ukraine and Russia who are in other operations, as well as assets under construction and in operation, including evacuation plans.

Alongside analysis and following up the sitution for EDP´s various divisions, organisations specialised in geopolitical conflict management have been appointed to provide greater knowledge about potential developments and thus anticipate EDP´s response to potential risks or threats. Considering the possible scenarios of the conflict´s development, an evaluation of the most relevant risks and impacts for EDP was developed, besides the main risk management and impact mitigation measures, which is subject to frequent revision and updating.

The uncertainty associated with the unfolding conflict persists into 2023 with the continuation of monitoring efforts and the adoption of measures to mitigate risk and associated impacts

Development of the Business Continuity & Crisis Management culture

EDP, through the Security & Business Continuity department, continues to promote a set of initiatives that aim to ensure the strengthening of its resilience culture, across all geographies and taking into consideration the importance of people in the management of disruptions, crisis and pre-crisis situations.

Of the various initiatives, the organisation of another annual meeting on Business Continuity is especially noteworthy, with the participation of the BUs, SPs and departments of the CC having responsibilities at this level, with the main aim of sharing experience, lessons learned and initiatives, as well as promoting cooperation among them. In addition to Business Continuity issues, crisis management initiatives are addressed, as well as Safety and Security whenever relevant.

In parallel, the publication of quarterly newsletters was assured, especially focused on Business Continuity and crisis management, and also incorporating Security and Safety issues, developed in collaboration with the BU and SP teams and the CC departments, in order to disseminate the main news and developments on these topics at EDP level.

National Critical Infrastructures

Directive 2008/114/EC defines "critical infrastructure" as "an asset, system or part thereof located in Member States which is essential for the maintenance of vital societal functions, health, safety, security, economic or social well-being of people, and the disruption or destruction of which would have a significant impact in a Member State as a result of the failure to maintain those functions".

In Spain and Portugal, EDP is responsible for a set of critical infrastructures, which include electricity generation and distribution infrastructures (physical and control facilities), as well as related customer service activities, which were identified in the bringing of Directive 2008/114/EC into Spanish and Portuguese legislation.

It should be noted that a new European directive, Directive (EU) 2022/2557 of the European Parliament and of the Council of 14 December 2022 on the resilience of critical entities (repealing Directive 2008/114/EC with effect from 18 October 2024), has recently been approved and is waiting to be brought into national law.

Due to the diversity of critical infrastructures under its responsibility, EDP has proactively adopted strategies to respond to a variety of risks, such as physical risks (e.g. fires, earthquakes, atmospheric events, including extreme events) and technological risks (including, but not limited to, cybersecurity risks for operating and information systems).

In addition, the measures and tools adopted to mitigate these risks are diverse and of distinct character, adjusted to its infrastructures´ peculiarities, necessarily including physical security (safety and security aspects), technological security and cybersecurity, as well as business continuity management, leveraged by a strong component of training and exercises. For each of the critical infrastructures, EDP has developed the respective operator's safety plan, supported by conclusions resulting from their risk analyses and the set of measures implemented, in line with those laid down in Directive 2008/114/CE and with the recently revised national legislation DL 20/2022 (repealed DL 62/2011).

Additionally, it is important to mention the role assumed by EDP in promoting the adoption of management best practice for critical infrastructures in the sector, through their dissemination but also through cooperation with external bodies, participating in exercises and workshops related to the topic.

Also in this context, and following the approval of the Sendai Framework for Disaster Risk Reduction 2015-2030, EDP has participated in the National Platform for Disaster Risk Reduction (PNRRC) in Portugal, under the aegis of a sub-committee coordinated by ANEPC (National Authority for Emergency and Civil Protection). We highlight participation in the development of the Handbook on "Good Practices for Critical Infrastructure Resilience – Private Sector and State Business Sector", framed within the PNRRC activities for the Triennium 2015-2017, available on the PNRRC website.

Business Continuity & Crisis Management outlook, 2023

> **Having reached a high level of maturity in terms of Business Continuity, EDP will continue to consolidate its capacity to respond to and recover from disruptive situations in its various geographies during 2023.**

During 2023, EDP will continue with some of the initiatives and projects originated in 2022, at the same time focusing on the development of new initiatives with the intent of consolidating and strengthening Business Continuity and crisis management practices at EDP.

Starting to set up the digital solution chosen to support of Business Continuity management will be one of the main activities to be developed during 2023. The implementation of a pilot project, with a limited scope, will make it possible to deepen knowledge of this solution and establish procedures to be followed for the effective incorporation of the NCMS of the various BU, SP and CC departments.

EDP's dependence on external service providers and suppliers worldwide has led to the strengthening of its capacity to monitor the risks and threats to its supply chain, the aim of

ongoing improvement being the safeguarding of redundancy and contingency mechanisms in contracts.

Being a year of consolidation for Business Continuity and crisis management practice, the development of a crisis management exercise programme, with a view to confirming and strengthening its capacity to respond to crisis and pre-crisis situations, is assumed by EDP as a strategic objective for 2023. In parallel, its aim is also to promote and monitor, together with the BUs, SPs and CC departments, the setting up of Business Continuity management exercises, taking them as critical to the success of the BCMS and ensuring the timeliness and adequacy of continuity plans and procedures in order to enable the various teams to respond better to real disruption situations and identify the improvements to be adopted.

The strengthening of resilience culture at EDP, supported by the effective management of crisis and Business Continuity, continues to be a critical aspect, and the development of a training and awareness-raising programme on these issues is planned, following on from the initiatives already in place, such as the newsletter, knowledge-sharing sessions and e-learning training, complementing them with additional proposals.