



# **Whistleblowing Management Standard**

**Approved on 1 April 2024**

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**1. Version History**

<b>Version</b>	<b>Approval date</b>	<b>Prepared by</b>	<b>Approved by</b>	<b>Notes</b>
1	02/05/2023	C&CI/L&G/ETH	EBD	Initial Issue
2	01/04/2024	E&C	EBD	Review resulting from the reorganisation of the Ethics and Compliance areas

## 2. Purpose

The objective of this Standard is to formalise the model of governance, responsibilities and organisation of the complaint management process and the channels made available for this purpose. It also aims to implement the basic principles and rules applicable to the handling of complaints received.

## 3. Scope

This Standard applies to EDP - Energias de Portugal, S.A., as well as to companies over which EDP exercises control with its head office in Portugal, with the exception of companies controlled by EDP Renováveis, S.A., as well as the Fundação EDP.

## 4. References

This Standard is specifically underpinned by the following main internal and external reference documents:

- EDP Group Code of Ethics
- EDP Ethics Committee Regulation
- *Speak up* Whistleblowing Regulation
- EDP Group Integrity Policy
- EDP Group Compliance Standard
- Labour Code
- Law No. 83/2017 of 18 August, last amended by Law No. 99-A/2021 of 31 December, which establishes measures to combat money laundering and terrorist financing, partially transposing Directives 2015/849/EU of the European Parliament and of the Council of 20 May 2015 and 2016/2258/EU of the Council of 6 December 2016 (hereinafter Law No 83)
- Law No. 93/2021 of 20 December, which establishes general rules for the protection of whistleblowers, transposing Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of individuals reporting violations of European Union law (hereinafter Law No. 93)
- Decree Law No. 109-E/2021 of 9 December, which creates the National Anti-Corruption Mechanism and establishes a general regime for the prevention of corruption
- Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October, on the protection of individuals reporting violations of European Union law
- ISO 37002 - Whistleblowing management systems - Guidelines
- ISO 37301 - Compliance Management Systems - Requirements with guidance for use
- ISO 37001 - Anti-Bribery Management Systems

## 5. Terms and Definitions

The terms used in this Standard shall have the meaning set out below, purely for the purpose of interpreting this Standard:

- a) **PML-TF:** Prevention of Money Laundering and Terrorist Financing;
- b) **Unlawful conduct:** Any breach of law, regulation in force or EDP internal standard;

- c) **Unethical conduct:** Any breach of the principles set out in the EDP Code of Ethics;
- d) **Complaint:** Act of reporting unethical and/or unlawful conduct.
- e) **Whistleblower:** Any person lodging a complaint through the means made available for that purpose.
- f) **Obligated entities:** EDP Group companies with their registered office in Portugal with 50 (fifty) or more employees and, in certain cases, whose number of employees is lower than this threshold but whose company purpose or activity pursued nevertheless means they are obliged to provide a channel reserved for complaints in general under the provisions of Law No. 93, specifically:
- EDP Energias de Portugal, S.A. (hereinafter “EDP”)
  - E-REDES – Distribuição de Eletricidade, S.A. (hereinafter “E-REDES”)
  - SU ELETRICIDADE, S.A. (hereinafter “SU ELETRICIDADE”)
  - EDP Global Solutions – Gestão Integrada de Serviços S.A.
  - EDP - Gestão da Produção Energia, S.A.
  - EDP Comercial - Comercialização de Energia, S.A.
  - LABELLEC - Estudos, Desenvolvimento e Actividades Laboratoriais, S.A.
  - TERGEN - Operação e Manutenção de Centrais Termoeléctricas, S.A.
  - EDP Mediadora, S.A.
- g) **PML-TF obliged entities:** Entities of the EDP Group, based in Portugal, linked to the provision of a channel reserved for complaints about PML-TF, in particular:
- EDP – Energias de Portugal, S.A.
  - EDP IS – Investimentos e Serviços, Sociedade Unipessoal, Lda.
  - EDP Ventures - Sociedade de Capital de Risco, S.A.
  - EDP Mediadora, S.A.
  - EDP Global Solutions – Gestão Integrada de Serviços S.A.
  - EDPR PT - Promoção e Operação, S.A.
- h) **Retaliation:** Act or omission, including threats or attempts that directly or indirectly, occurring in a professional context and motivated by internal or external whistleblowing or public disclosure, which causes or may cause the whistleblower to unjustifiably suffer pecuniary or non-pecuniary damage. Under the general whistleblower protection regime, provided for by Law No. 93, the following acts are deemed to be retaliatory if carried out within two (2) years of the denunciation or disclosure:
- changes in working conditions;
  - suspension of employment contract;
  - negative assessment of performance or negative reference for employment purposes;

- not converting a fixed-term contract into an indefinite contract where there were legitimate expectations of it being converted;
- non-renewal of a fixed-term contract;
- dismissal;
- blacklisting, on the basis of an agreement at sectoral level, which may make it impossible for the whistleblower in future to find employment in the sector or industry concerned;
- termination of supply or services-rendered contract.

Unless there is evidence to the contrary, a disciplinary sanction applied to the whistleblower up to two (2) years after the complaint or disclosure shall also be considered abusive. Only those who lodge a complaint in good faith and in the serious belief that the information transmitted is true, and cannot be deliberately and manifestly unfounded, benefit from the protection outlined here.

## **6. Description and Responsibilities**

### **6.1. Organisational background**

EDP is a vertically integrated multinational utility that has been cementing its presence in the global energy landscape for over 40 years and operates in more than 20 countries on 4 continents. EDP has been part of Euronext Lisbon since 1997, and EDP Energias do Brasil, S.A. and EDP Renováveis, S.A. are also listed on the stock exchange.

The EDP Group operates throughout the electricity value chain (generation, transmission, distribution and trading) and in the gas supply business. It is currently the world's fourth-largest wind power producer and more than 70% of the energy it produces is renewable.

In Portugal, the EDP Group is active in the production, distribution and supply of electricity and gas. EDP acts as a holding company, with its mission the promotion, development and management of undertakings and cross-cutting activities aimed at increasing and improving the performance of all the companies in its Group.

Although EDP's main business is to develop the traditional and renewable areas of the electricity and gas value chain, other activities are also carried out by the holding company's subsidiaries, particularly in support of the core business, as follows: industry-related consulting services, insurance mediation (non-life products), technological innovation, venture capital, real estate, engineering work, and health<sup>1</sup> care provision.

Moreover, for the purposes of supporting the EDP Group business, the Group also includes a shared services rendered subsidiary for management, consulting, administration, operation and intermediation, within the areas of general administrative support, accounting and finance, human resources, and occupational safety, hygiene and health.

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<sup>1</sup> Every year, acquired, divested, incorporated and merged companies are identified in the Group's annual report, together with any other changes to the EDP Group's consolidation perimeter, and these are published on the EDP website (<https://www.edp.com/en/investors/investor-information/results-reports#reports-and-accounts>).

## 6.2. Background to Whistleblowing within the EDP Group

The EDP Group pursues a policy of transparency and gives a voice to those who consider that certain conduct violates ethical principles, legal provisions or internal regulations.

For this reason, as part of its activity the EDP Group has established several contact channels over the years which enable anyone who so wishes to submit grievances or complaints in a safe manner.

At the end of 2021, Law No. 93 of 20 December (Law No. 93) was published. This transposed into Portuguese law Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of individuals reporting violations of European Union law.

Through the aforementioned legislation, the obligation to implement channels and procedures to ensure the safe and confidential submission of complaints on a wide range of issues was created, namely: public procurement; financial services, products and markets and the prevention of money laundering and terrorist financing; safety and conformity of products; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety, animal health and animal welfare; public health; consumer protection; protection of privacy and personal data and security of the network and information systems; the financial interests of the European Union; internal market and corporate taxation rules; violent crime, especially violent and highly organised crime; organised and economic-financial crime.

The rationale behind the new regime is that people who are working for or have professional contact with an organisation are sometimes in a privileged position to become aware of threats or actual harm arising within these organisations.

The new regime aims to strengthen the protection to be given to those who, in good faith and in a reasoned manner, decide to report non-compliant conduct, within the framework of the matters indicated above, through appropriate channels. This protection is achieved by ensuring the safe and confidential receipt and forwarding of the complaint, its proper handling in an unbiased and timely manner and, above all, by an express prohibition of retaliation, reinforced by a (rebuttable) presumption, which qualifies as retaliatory various acts which, although apparently legitimate, may constitute discriminatory conduct, in reaction to the whistleblower's actions.

In this context, a draft review of the complaints management system within the EDP Group was undertaken and, consequently, a reorganisation of the complaint channels provided within EDP. Different complaint channels were created, currently called "*Speak up Channels*".

## 6.3. Guiding Principles

The management of complaints at EDP obeys the following guiding principles:

- a) **Anonymity** - The whistleblower may, if s/he wishes, request anonymity and must select this option in the respective complaint channel. Anonymity does not preclude two-way communication between the person responsible for handling, analysing and archiving and

the whistleblower. There is also the possibility to deliver documentation supporting the reported facts, by submitting this via a field created for that purpose in the aforementioned channel.

- b) Good faith** - All communications must be made in accordance with the principle of good faith and with appropriate reasons. The deliberate and unsubstantiated use of complaint channels may constitute an offence of a disciplinary, civil or criminal nature.
- c) Confidentiality** - Communications are treated as confidential information by all those responsible for receiving and processing such communications. Knowledge of the complaint shall be limited to those who need this information to carry out the task of receiving, tracking and archiving the communications reported via the channel.
- d) Record keeping** - The record of complaints received shall be kept for at least 5 (five) years and, irrespective of such period, while any court or administrative proceedings relating to the complaint are ongoing.
- e) Abuse** - Without prejudice to the legal guarantees of non-retaliation in the event of a complaint being filed in a reasoned manner and in good faith, abusive and bad-faith use of the channels for reporting irregularities may expose the whistleblower or other persons involved to disciplinary or legal proceedings.
- f) Independence and autonomy** – All persons who have, or are suspected of having, a conflicting interest or direct or indirect involvement with the situation reported are excluded from the investigation and decision-making process. This is to ensure that the receipt, screening, analysis and filing of complaints are handled independently and impartially and guarantee the absence of any potential conflict of interest in the exercise of these functions.
- g) Protection of the whistleblower / Non-retaliation:** The protection of and non-discrimination against whistleblowers will be guaranteed and reprimands or retaliation will not be tolerated against those who, in good faith and in a reasoned manner, lodge complaints, even if the facts reported are not precise or do not give rise to any judicial proceedings. Lodging any complaint may not, therefore, in itself serve as a basis for initiating any disciplinary, civil or criminal proceedings against the whistleblower, except where the complaint is deliberately and manifestly unfounded. Similarly, no act of reprimand, retaliation, discrimination or disciplinary action shall be tolerated against anyone who refuses to engage in a particular activity on the ground that he or she reasonably considers that the activity would involve irregularities. Any such action shall be reported through available complaint channels and shall be subject to disciplinary action, in accordance with the law and the internal policies and procedures of the EDP Group. The prohibition of retaliation, in any form, extends to anyone who assists the whistleblower in the complaints procedure and whose assistance must remain confidential, including trade union representatives or workers' representatives, to any third party connected with the whistleblower who could be subject to retaliation in a



professional context, and to legal persons or similar entities owned or controlled by the whistleblower, for whom the whistleblower works or to whom the whistleblower is professionally connected.

- h) Protection of the potential wrongdoer** – Persons who are mentioned in the complaint as those who committed the offence or are associated with it shall not be denied any rights or procedural guarantees generally acknowledged, namely the presumption of innocence, the guarantees of defence in criminal proceedings and the confidentiality of their identity.

#### **6.4. Governance Model / responsibilities**

A hybrid/mixed model for the management of complaint channels and the handling of complaints received is required, involving different actors:

- a) Central / corporate whistleblowing management team** comprised by the Ethics & Compliance Officer (hereinafter “ECO”). It may involve another Ethics & Compliance Global Unit (hereinafter “E&C”) employees, such as the persons responsible for this investigation process, where a formal investigation is necessary. The EO has access to all complaints received through the different channels, whatever their nature, and will be responsible for consolidating and reporting aggregated information on the number and nature of complaints received via the different channels, their resolution, and the corrective actions pursued within that framework.

The ECO should also take note of the complaints made through the channel for the Prevention of Money Laundering and Fight against Terrorist Financing, which is managed by the respective Responsible for Regulatory Compliance, in accordance with the provisions of Law No. 83. All complaints regarding matters monitored under the EDP Compliance Management System, in particular relating to Law No. 83 and Law No. 93, and financial matters, shall be reported by the ECO to the Executive Board of Directors (“EBD”) and to the Financial Matters Committee/Audit Committee (“FMC/AC”) as part of the monitoring of the EDP Compliance Management System.

Complaints associated with situations that may constitute bullying and/or sexual harassment are submitted to a preliminary analysis by the ECO and, after confirming its classification, send it for parallel analysis by the Labour section of the Legal & Governance Global Unit (“L&G”), without prejudice to the investigation to be carried out on the ethical component.

- b) Internal team, belonging to each obliged entity:** within the *Speak up* channels of the Obligated Companies, a person responsible for the company must be identified and direct interaction with the whistleblowers must be carried out, whenever possible, by someone belonging to the company concerned.

In exceptional cases where this is not possible, communications should be underwritten institutionally by the company concerned. Specific responsible persons will have access to the

complaints received regarding the matters provided for in the general whistleblower protection regime approved by Law No. 93. In the case of regulated companies, those responsible will also have access to complaints concerning subjects covered by their codes of conduct.

Members of the centralised team, as well as the head of each company, are formally appointed by their Boards of Directors as being responsible for handling complaints received via their respective channels and are given internal responsibility for the exercise of such functions.

- c) **Management body of each obliged entity:** implementing acts (such as decision-making on disciplinary action, resolution or contractual termination, or equivalent measures) arising from the complaint management process conducted by the management team of each channel, and formed by the central and internal team, shall be carried out by the management body of the entity concerned.
- d) **EDP Ethics Committee:** after the analysis and processing of the complaints submitted about allegedly unethical behaviour, by the respective management team of each channel (formed by the central team and the internal team), a proposal for an opinion will be addressed by the ECO to the EDP Ethics Committee, and contain the results of the analysis/investigation carried out. The EDP Ethics Committee is responsible for assessing the complaints received, expressing its opinion on the conclusion/resolution and issuing the recommendations deemed relevant, addressed to the competent bodies of the companies concerned, where applicable.
- e) **Financial Matters Committee / Audit Committee:** with regard to complaints submitted on financial matters, the FMC/AC may, where it deems appropriate, recommend to the ECO or the C&IC, depending on the subject, the pursuit of actions complementary to those foreseen in the investigation process presented by them. The ECO is informed of the deliberation taken by the Ethics Committee, including the results of the analysis/investigation carried out and corresponding final motions for resolutions.
- f) **E-REDES Compliance Committee:** With regard to complaints falling within the competence of the E-REDES Compliance Committee (in particular relating to matters covered by the E-REDES Code of Conduct), the ECO informs this Committee of the decision taken by the Ethics Committee (if applicable), as well as the results of the analysis/investigation carried out and corresponding final motions for resolutions.
- g) **Compliance Officer for the Prevention of Money Laundering and the Fight against Terrorist Financing:** Complaints on issues covered by Law No. 83 that concern obliged entities under the Law will be forwarded to a specific autonomous channel and will be accessed by the designated Responsible for Regulatory Compliance for PML/TF. Under internally defined procedures, this person will pursue the respective investigation process autonomously and independently, without prejudice to the knowledge of these complaints by the ECO. With regard to the intervention of the investigation team in matters which have given rise to the reporting of suspicious transactions to the Central Bureau of Investigation and

Prosecution/Financial Intelligence Unit of the Judicial Police, compliance with the non-disclosure obligation laid down in that legal act should be ensured. In addition, the reporting of serious facts complained of should be made to the supervisory body, when appointed, or to the administrative body.

#### 6.5. Types of reporting channels:

Depending on the facts complained of, the model relies on the provision of differentiated channels, and any complaint received on a channel not intended for that purpose, taking into account the subject matter, or received by means other than the established channels, should be forwarded to the relevant *Speak Up* channel in order to ensure it is properly processed. The *Speak up* channels are as follows:

##### a) EDP and Corporate *Speak Up* Channel:

Global and transversal channel, available at <https://www.edp.com/pt-pt/sobre-nos/edp/speak-up> and on the intranet at [Speak Up | Page \(edp.com\)](#), which can be used by stakeholders of any EDP Group company to report complaints about alleged violations of the EDP Code of Ethics, including topics such as: a) specific compliance obligations such as those foreseen in Law No. 93 and Law No. 83; b) financial matters; and c) situations that may constitute bullying and/or sexual harassment.

##### b) Specific *Speak up* Channels

###### Regulated Companies (E-REDES and SU Eletricidade):

Specific channels for regulated companies to report complaints relating to alleged breaches of the EDP Code of Ethics, internal policies, codes and regulations, as well as related to the matters set out in Law No. 93 and Law No. 83, or the Code of Conduct within the respective company; available at:

- Speak up E-REDES: <https://www.e-redes.pt/pt-pt/speak-e-redes> and on the intranet, at [Speak Up | Page \(edp.com\)](#); and
- Speak up SU ELETRICIDADE: <https://sueletricidade.pt/pt-pt/page/2791/damos-voz> and on the intranet, at [Speak Up | Page \(edp.com\)](#).

##### c) Other obliged companies

Complaint channels specific to obliged entities (except EDP, E-REDES and SU Eletricidade) which, according to Article 8 of Law No. 93, must have their own internal complaint channel for reporting queries and/or complaints about alleged infringements related to the matters provided for in Law No. 93 and only within the confines of the respective company. For all matters not covered by Law No. 93, stakeholders of these obliged entities must use the *Speak Up* Corporate Channel. These channels can be accessed through the following links:

- EDP Global Solutions - <https://www.edp.com/pt-pt/sobre-nos/edp/speak-up> and on the intranet at [Speak Up | Page \(edp.com\)](#);
- EDP Produção - <https://www.edp.com/pt-pt/sobre-nos/edp/speak-up> and on the intranet at [Speak Up | Page \(edp.com\)](#);
- EDP Comercial - [Who we are | EDP](#) and on the intranet at [Speak Up | Page \(edp.com\)](#);

- Labelec - <https://www.edp.com/pt-pt/sobre-nos/edp/speak-up> and on the intranet at [Speak Up | Page \(edp.com\)](#);
- Tergen - <https://www.edp.com/pt-pt/sobre-nos/edp/speak-up> and on the intranet at [Speak Up | Page \(edp.com\)](#);
- EDP Mediadora - <https://www.edp.com/pt-pt/sobre-nos/edp/speak-up> and on the intranet at [Speak Up | Page \(edp.com\)](#).

## 6.6. Risk Management

In addition to the risks underlying the different matters subject to a complaint, for which the existence of a reporting/complaint mechanism is in itself a risk mitigation mechanism, the risks inherent in the complaint management process itself should be considered in the abstract.

Therefore, the risks of non-compliance with the legally established requirements on complaint management should be taken into account under the different applicable legal regimes (notably whistleblower protection, prevention of corruption, prevention of money laundering and the fight against terrorist financing).

Mitigation of these risks is achieved by defining guiding principles in accordance with point 6.3 and specific procedures that meet these legal requirements as outlined below.

### Complaint Management Process:

In addition to this Standard, the complaint management process and the management of the risks associated with it are covered by the following Standards:

- EDP Group Code of Ethics;
- EDP Group Integrity Policy;
- Complaint Management Procedure;
- EDP Group Suspicious Operations Reporting Procedure (PML/TF)
- *Speak up* Whistleblowing Regulation (for public disclosure);
- PML-TF Irregularities Reporting Regulation.

These Standards systematise the complaint management process and should be reviewed periodically to ensure that they remain in compliance, including with obligations resulting from existing legislation.

Standards, policies and procedures can be accessed via the relevant publication in the Organisation Manual, available on the EDP intranet.

## 6.7. Resources, Training and Communication

### Resources

EDP ensures that employees involved in the complaint management process are competent and aware of the relevance and importance of their activities in the complaint management process and how they contribute to achieving their performance and effectiveness objectives. Attendance records and evidence of competencies are kept for the training sessions held on the subject.

### Training

With regard to the management of complaints, cross-departmental and specific training shall take place, in particular:

- Cross-departmental training in e-learning format to inform all employees of the channels available and the principles and rules associated with the complaint management process;
- Specific face-to-face or e-learning training for professionals responsible for monitoring/handling complaint procedures.

Training is regularly monitored by reviewing data on participation rates, and managers receive a report every month detailing the compulsory training that has yet to be completed by each member of the team.

### Communication

Communication is established to give information about the *Speak up* channels and their complaint management process, both internally and externally. The internal communication tools used are: e-mails sent by top management, information on the company's intranet, publications on the internal social network, training and awareness-raising meetings.

In addition, external communication initiatives are held in this area, notably through the websites of different companies, as well as through information provided in the EDP Group's Annual Integrated Report.

## **6.8. Monitoring**

The complaint management process shall be monitored specifically through:

- Implementation and recording of evidence of the defined procedures being followed in the handling of different complaints by the various coordinators involved;
- Regular assessment of possible opportunities for improvement in the process by the various stakeholders;
- Consolidation and analysis by the E&C of aggregated information on all complaints received via the different channels, classifying the different types of complaints received, as well as their origin, the results of the analysis carried out and the nature of corrective actions taken.

## **6.9. Internal audit**

In addition, in order to assess the design, effectiveness and compliance of the complaint management process, with regard to both compliance with internal standards and the applicable legal framework, and to identify possible anomalies or opportunities for improvement, internal audits may be carried out by the Internal Audit Global Unit in accordance with its annual internal audit plan, or by an external body contracted for that purpose, including:

- i. A review of the alignment of the process and defined procedures with the applicable legal requirements;

- ii. A review of compliance with the procedures defined in the handling of complaints received.

In this context, the audit testing methodology shall cover:

- obtaining and reviewing the description of implemented procedures and relevant documentation;
- walkthrough analysis of the procedures implemented in order to verify the adequacy of their design;
- obtaining and analysing evidence for the handling of complaints selected for random testing, in accordance with defined procedures.

The size of the occurrence samples selected for testing should be defined by the auditor, to provide a reasonable level of assurance as to the completion/outcome of the test.

Where applicable, follow-up of audit results and possible opportunities for improvement should be carried out, to identify the relevant corrective action and the person responsible for implementation.

#### 6.10. Reporting

EDP adopts a reporting model based on the principle of transparency and reliable reporting on the operation and effectiveness of the complaint management process.

Reporting of information on the complaint management process is submitted periodically to the EDP Ethics Committee, to the EBD and FAC/AC, in accordance with their respective information needs and competencies, but also whenever there are situations of special significance, in the shortest possible time.

#### 6.11. Continuous improvement

Continuous improvement aims to ensure the sustainability of the complaint management process in a continuous and consistent manner, which is why the principles, rules and procedures applicable to this process are regularly reviewed.

In addition, action plans are created and implemented if necessary to address opportunities for improvement identified.

To trigger an improvement action, the following main sources of information are considered:

Origin	Information source
Process monitoring	<ul style="list-style-type: none"> <li>• Analysis of the adequacy and effectiveness of the process by the departments involved (e.g., response times, aggregated information production, consistent handling of complaints, etc.)</li> <li>• Result of critical analysis by top management</li> </ul>
Audits	Results / recommendations of audits carried out

## **7. Final provisions**

### **7.1. Non-compliance**

The EDP Group requires its employees to comply with and enforce the law and regulations in force, as well as the rules of conduct and other provisions laid down in internal regulations.

Non-compliance with these standards shall be sanctioned internally, and appropriate disciplinary and/or legal measures shall be taken where applicable.

The potential administrative offence liability of EDP Group entities does not exclude the individual liability of natural persons holding administrative, managerial, leadership or supervisory positions, representatives, employees or other permanent or temporary staff.

In applicable and contractually foreseen situations, non-compliance with the law, regulation or internal regulations in force by persons or by third parties with whom the EDP Group companies have a relationship (suppliers, service providers, customers, business partners, partners or others) may result in the suspension or termination of the contractual relationship.

### **7.2. Frequency of review of Standard**

The E&C, in conjunction with the L&G, is responsible for reviewing this Standard every two years or whenever there are relevant changes in the applicable legal framework and in the context of the activities carried out by EDP, and also whenever new circumstances arise that demonstrate that it is not adequate. It must submit the proposed changes for the approval of the EBD of EDP.