



Annual Evaluation Report of the Corruption Risk Prevention Plan and Related Offenses - 2025

EDP Group - Portugal



Index

I.	Framework	3
II.	Control Mechanisms	4
a)	Risk Review	4
b)	Training and Awareness	4
c)	Update of Internal Regulations	5
d)	Digitalization and Strengthening of Control Mechanisms	5
e)	Monitoring and Auditing	5
III.	Monitoring of RGPC Instruments	6
IV.	Conclusion	6
V.	Final Provisions.....	6

I. Framework

Following the approval of the National Anti-Corruption Strategy 2020–2024, Decree-Law no. 109-E/2021 was published in the Portuguese Official Gazette on 9 December 2021, establishing the National Anti-Corruption Mechanism (“MENAC”) and approving the General Regime for the Prevention of Corruption (“RGPC”).

With the purpose of preventing, detecting and sanctioning acts of corruption and related offences, the RGPC establishes, for entities subject to its application, both public and private, the obligation to adopt and implement a Compliance Program, which must include a Corruption and Related Offences Risk Prevention Plan (hereinafter “PPR”).

EDP has been maintaining and enhancing its mechanisms in this area through a Specific Compliance Program — the Integrity/Anti-Corruption Compliance Program — applicable to all EDP Group companies.

In this context, EDP, S.A. renewed, in March 2026, the certification of its Compliance Management System (ISO 37301) and Anti-Bribery Management System (ISO 37001), initially obtained in January 2022, both certifications issued by the independent entity AENOR, with the scope of certification currently extended to the entities covered by the PPR, as defined therein.

In June 2022, and in accordance with the RGPC, the PPR applicable to EDP Group entities headquartered in Portugal and subject to the respective obligation was formally approved and published.

Pursuant to the RGPC, namely regarding the requirement for periodic review and whenever relevant changes occur in the structure or activities of the entities, the version of the PPR approved and published in June 2025 constitutes the reference framework for this report.

This version reflects the work carried out within the already implemented Compliance Management System, including the identification and classification of corruption and related offences risk factors applicable to the entities covered, as identified in the PPR, as well as the respective control mechanisms and preventive and corrective measures aimed at their mitigation.

Following the publication of the PPR, and still during 2025, in the context of the EDP Group reorganization, a process was undertaken to review risk and control matrices, with a view to their consolidation and harmonization, leading to updates in risks and controls, including the review of inherent and residual risk assessments.

These updates resulted in a consolidated integrity risk matrix, which supported the revision of the PPR, whose new version is presented in conjunction with this report.

This Annual Assessment Report, referring to the year 2025, aims to fulfil with the obligation set out in the RGPC regarding the evaluation and execution of the PPR, which is available through the relevant [link](#) or accessible via the intranet or the official EDP website, including, namely, the quantification of the level of implementation of the identified preventive and corrective measures, as well as their evolution status, within a continuous improvement approach.

II. Control Mechanisms

As mentioned in the PPR, preventive and corrective measures have been implemented for all identified corruption and related offences risks, in order to reduce the likelihood of occurrence and the associated impact. Even though no need was identified to implement additional mitigation mechanisms, several Compliance initiatives were further strengthened under a continuous improvement approach.

Thus, throughout 2025, the following initiatives were carried out:

a) Risk Review

Within the scope of the evolution of the Compliance Management System and as a result of the Group's reorganization, the process of reviewing risk and control matrices was continued, aiming to ensure their proper adaptation to the new organizational context and to promote harmonization.

This review is part of a continuous improvement process and does not result from the identification of irregularities, but rather from the need to ensure the ongoing adequacy, consistency and alignment of the risk management model with the Group's organizational reality.

In this context, the work carried out throughout 2025 and concluded in 2026 supported the update of the PPR, whose new version is approved and published simultaneously with this report.

b) Training and Awareness

With regard to raising employees' awareness on corruption risk prevention, and within the training plan for 2025, several initiatives were developed with the aim of strengthening the culture of ethics and compliance within the EDP Group.

During 2025, active monitoring of the "How I Met Integrity II" training program was maintained, ensuring its proper implementation and reinforcing content and participation.

This training recreates real-life professional situations in which employees face integrity dilemmas. In each scenario, participants are challenged to apply the integrity policy and corresponding procedures, demonstrating their understanding of the core principles of these documents. Its main objective is to promote reflection on situations that may involve unlawful acts or inappropriate/unethical conduct, ensuring employees understand how to act in accordance with the EDP Group Integrity Policy.

In 2025, the "Compliance on Tour" training campaign was launched, consisting of in-person sessions where members of the Ethics and Compliance area explained key compliance policy principles to employees. These sessions were structured around practical case studies, fostering an open dialogue to ensure correct understanding of procedures.

Additionally, the initiative "Ethics in Action: A Practical Guide to the Code of Ethics" was launched, providing a clear and accessible approach to the Code of Ethics, highlighting its importance in building a work environment based on integrity, transparency and respect.

Beyond these initiatives, awareness and sensitization actions on Ethics and Compliance topics were carried out, including the celebration of the International Anti-Corruption Day and the Global Ethics Day.

Furthermore, the process of identifying internal training needs was maintained, resulting in online sessions on integrity policies and procedures, targeted at areas where reinforcement was deemed necessary. These

initiatives demonstrate EDP's ongoing commitment to strengthening a culture of integrity and compliance within the organization.

c) Update of Internal Regulations

Taking into account the risk assessment and the maintenance of the effectiveness of control mechanisms, as well as the experience gained in the application of the various internal Compliance regulations (codes, policies, standards and procedures) relevant to the prevention of corruption, a set of internal regulations was updated during 2025, notably: the Code of Ethics, the Code of Conduct for EDP Group Top Management and Senior Financial Officers of the EDP Group, the Integrity Policy and the Third-Party Integrity Due Diligence Procedure.

Additionally, with the aim of strengthening control mechanisms related to third-party management and improving the effectiveness of corruption risk assessment and mitigation through intermediaries, a transversal Procedure on Agreements with Intermediaries was approved, ensuring that business relationships with intermediaries comply with applicable legal requirements and best practices in transparency, ethical conduct and integrity.

d) Digitalization and Strengthening of Control Mechanisms

In 2025, EDP strengthened the digitalization of Compliance processes, namely using artificial intelligence-based solutions and the development of digital tools to support the processes for the prevention of risks of corruption and related offences.

In this context, the implementation of Mind4Compliance stands out, enabling automated and structured access to relevant regulatory documentation, as well as the generation of consistent and well-grounded responses, contributing to the standardization of criteria and reducing the risk of misinterpretation and misapplication of rules.

In parallel, the "Compliance Processes" application was developed, centralizing the management of requests related to integrity matters, ensuring greater traceability, control and consistency in the application of defined procedures.

These initiatives contribute to strengthening prevention mechanisms, namely through improved information quality, progressive automation of data collection for monitoring indicators, and increased efficiency and robustness of implemented controls.

e) Monitoring and Auditing

In addition to the continuous monitoring and supervision of implemented mitigation measures, between October and November 2025, with a view to reinforcing the monitoring of their effective implementation and within the scope of the procedure for maintaining the Anti-Bribery Management System (ISO 37001) certification, an internal audit was carried out on the Integrity Compliance Program / Anti-Bribery Management System.

This audit aimed to (i) identify potential compliance gaps with standards, including reviewing the adequacy of the risk and control matrix, (ii) test implemented controls/mitigation measures based on a defined testing plan to assess their adequacy and effectiveness, and (iii) identify recommendations or improvement opportunities.

It was concluded that:

- The Integrity Compliance Program / Anti-Bribery Management System is aligned with ISO 37001 requirements;
- The methodology adopted for identifying corruption risks and assessing impacts is adequate;
- The tested controls/mitigation measures were considered adequate and effective.

Similarly, in March 2026, AENOR conducted the external audit for maintaining certification of the Compliance and Anti-Bribery Management Systems, confirming their implementation in accordance with ISO requirements, with no non-conformities identified.

III. Monitoring of RGPC Instruments

Within the scope of monitoring the instruments provided under the RGPC — namely the Code of Conduct, the Corruption and Related Offences Risk Prevention Plan, the Whistleblowing Channel and the Training Program — their functioning was monitored throughout 2025.

This assessment concluded that no irregularities were identified in the Code of Conduct, the Risk Prevention Plan or the Training Program, and therefore no corrective measures were required.

Regarding the whistleblowing channel, no irregularities were identified in the process of receiving, recording and handling reports, ensuring confidentiality, independence and non-retaliation, in line with the EDP Whistleblowing Management System.

IV. Conclusion

Overall, based on the continuous monitoring of control mechanisms/risk mitigation measures implemented under the PPR, as well as the results of internal and external audits carried out by independent entities on the Integrity Compliance Program, it can be concluded that, in all material respects, the identified preventive and corrective measures are adequately and effectively implemented.

Accordingly, the residual risk assessment of the risk factors identified in the PPR remains at acceptable levels, with no high-risk situations identified.

V. Final Provisions

The publication of this Annual Evaluation Report is ensured for the employees of the EDP Group, through the intranet and the official EDP website.