



Responsible AI Policy

Defines the rules and responsibilities for the responsible use of Artificial Intelligence within the EDP Group. It ensures ethical, secure and compliant AI use in line with applicable regulation and EDP's values.

Disclosure: Public

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Version	Date of Approval	Elaboration	Approval	Comment / Revoke
1.	27/05/2025	DGU	EBD	Initial Issuance
2	18/05/2026	DGU	EBD	Revision – Revokes the SO 11/2025/EBD, of 27/05/2025
	Main changes: <ul style="list-style-type: none"> – Clarifies the Policy as the primary governing document, strengthens alignment with a risk based regulatory approach, reinforces governance and oversight across the AI lifecycle, and recognizes the need for structured documentation and monitoring to be detailed in specific standards. 			

2. OBJECTIVE

This Policy establishes the strategic, governance and control Artificial Intelligence Management System (AIMS) for the development, acquisition, implementation and responsible use of Artificial Intelligence (AI) within the EDP Group, as AI evolves and becomes increasingly integrated into different areas of the Group’s activities, operations, and processes. It sets out principles, general guidelines and lines of responsibility that support a structured and progressive alignment with (i) the applicable internal controls and governance model, (ii) the relevant legal and regulatory framework, including the European Artificial Intelligence Act and the General Data Protection Regulation, and (iii) the EDP Group’s strategy, reflecting its vision of leading the energy transition and creating superior value with a strong focus on sustainability.

In this context, the Responsible AI Policy operationalizes the EDP Code of Ethics in the context of AI and establishes a comprehensive AIMS that:

- Supports the strategic pillars of the EDP Group: accelerated and focused growth, ESG excellence, a distinctive portfolio, and superior value creation for stakeholders;
- Promotes the ethical, fair and trustworthy use of AI, ensuring transparency and accountability in AI-supported processes, including automated decision-making;
- Ensures the security, privacy and protection of the data used by AI Systems and AI Assets;
- Mitigates legal, operational and reputational risks associated with the use of AI, while maximizing its benefits; and
- Fosters AI innovation aligned with the EDP Group’s values, mission and sustainability commitments.

3. SCOPE

This Policy applies to all AI Systems and AI Models developed, acquired, integrated or used by the EDP Group, covering all Platforms, Regions, Business Enablement Functions, Global Business Services, other structures and all entities and subsidiaries within EDP Group, including their respective technological platforms.

This Policy also applies to all employees (permanent or temporary), members of governance bodies, and third parties (including service providers, contractors or their personnel) who, in the course of their duties, develop, access, use, integrate or interact with the EDP Group's AI Systems, regardless of the legal nature of their relationship.

The application of the Policy is carried out proportionally to the level of risk, the purpose of the system, and the role played by the relevant EDP Group entity within the system's lifecycle. In the event of a conflict with mandatory local legislation, the applicable legal provision shall prevail. Whenever higher standards are required, such standards shall be observed, with the involvement of the relevant functions, including Legal & Governance (L&G) and Ethics & Compliance (E&C).

4. OBJECT

i. Principles of Conduct

EDP's development, acquisition, implementation and AI use is guided by a set of key principles that reflect the Company's values, EDP's Code of Ethics and international norms for trustworthy AI, ensuring compliance with applicable AI legal requirements:

Respect for Human Rights and Social Well-being: AI Systems must uphold dignity, autonomy, safety, and fairness, particularly in high-risk scenarios.

Non-Discrimination and Fairness: AI Systems must be designed, developed, trained and used in a way that prevents unjustified bias and discrimination, promoting fairness, inclusion and equal treatment, in accordance with applicable legislation.

Privacy and Data Protection: Whenever they involve the processing of personal data, AI Systems must comply with the applicable legal and regulatory framework on data protection and cybersecurity, ensuring data quality, integrity, security and adequacy throughout the entire lifecycle.

Transparency and Explainability: AI Systems must be designed and used in a manner that enables appropriate levels of transparency, traceability and explainability, proportionate to the risk and context of use, ensuring adequate understanding of their functioning and outputs.

Human Oversight and Control: AI Systems are designed to ensure appropriate human oversight, particularly in critical or high-impact decisions, and to address risks arising from use outside of the intended purpose, intentional misuse, or unintentional misuse. Qualified individuals can review, intervene or override AI-supported outcomes when necessary, ensuring that decisions affecting individuals are not taken without meaningful human involvement.

Cybersecurity, Reliability and Safety: AI Systems must be robust, reliable and secure, used only for their authorized purpose and aligned with cybersecurity policies and internal practices. Their boundaries, capabilities and limitations must be clear to prevent misuse, unintended expansion or unforeseen impacts. EDP also ensures resilience to vulnerabilities and cyberattacks, protecting model integrity through safeguards that are independent and complement data privacy requirements.

Innovation and Accountability: The use of AI must support the EDP Group's innovation strategy while ensuring responsible governance, adequate documentation, traceability, and control and response mechanisms proportionate to the level of risk.

Environmental Digital Sustainability: AI Systems are designed and used with consideration for their environmental and social impact, supporting EDP Group's sustainability ambitions. EDP promotes

energy, water and carbon efficiency in AI and data infrastructure operations, in line with its decarbonization strategy.

Training and Awareness: The EDP Group promotes continuous training and appropriate awareness initiatives on the legal, ethical, social and security risks associated with AI, strengthening literacy and a culture of responsibility in its use.

ii. Responsible AI Operating Model

EDP's AIMS defines the governance framework and lifecycle activities to ensure ethical and compliant AI use, under the oversight of the Responsible AI Committee.

a) Governance Structure

The governance model ensures a structured, consistent, and accountable management of AI use throughout the entire lifecycle of AI Systems within the EDP Group.

- **1st Line: AI Asset Owners & Delivery Teams** – responsible for AI Asset registration and compliance during development, deployment and acquisition.
- **2nd Line: Responsible AI (RAI) Specialist, L&G and E&C** – defines risk assessment methodology and ensures regulatory alignment.
- **3rd Line: Internal Audit** – conducts periodic reviews and lifecycle assurance.

The **Responsible AI Committee** provides oversight of AI governance and AIMS, promotes Responsible AI awareness, approves Risk Treatment Plans, and ensures cross-business alignment with EDP's ethical and regulatory commitments.

b) Risk-Based Activities

The EDP Group adopts a risk-based approach for the development, acquisition, implementation and use of AI Systems, applied transversally across their entire lifecycle.

To operationalize responsible AI use, EDP applies a set of structured activities that guide the full AI lifecycle - from initial assessment through to monitoring and documentation. These activities ensure that AI Systems are deployed safely, ethically, and in compliance with internal and external requirements.

- **Purpose Assessment:** Classifies AI use cases based on intended purpose and risk level (Unacceptable, High, Medium, Low) reflecting their impact and alignment with applicable legislation.
- **Readiness Review:** Conducted prior to deployment to ensure the required safeguards and controls are in place. Where gaps are identified, a Risk Treatment Plan must be submitted and approved before deployment.
- **Monitoring & Maintenance:** AI Systems are continuously monitored and updated as needed.
- **Documentation & Inventories:** All AI Assets are registered, version-controlled, and documented in the central inventory.

The EDP Group does not develop, acquire, implement or use AI Systems whose use is prohibited under applicable AI-related laws and regulations, including the European AI Act.

The risk classification criteria, applicable activities and operational risk-management mechanisms are defined in specific internal standards and procedures.

5. FINAL PROVISIONS

The AIMS and related policies are subject to ongoing review and continuous improvement. The AIMS is periodically assessed to ensure its continued adequacy, effectiveness and alignment with the applicable legal framework, evolving regulatory expectations and the context of the EDP Group's activities.

E&C is responsible for coordinating regular reviews of the AIMS, in coordination with L&G and DGU, including proposing updates when relevant changes occur or when new elements indicate the need for improvement. Any material changes are submitted for approval by the EDP Executive Board of Directors and communicated to relevant stakeholders.

Any questions regarding the interpretation or application of the AIMS or related policies should be directed to E&C, which will provide guidance on the appropriate course of action in coordination with L&G and DGU. Users remain responsible for staying informed of updates or changes.

Compliance with the Policy, Monitoring and Reporting

The EDP Group establishes appropriate mechanisms to monitor compliance with this Policy. Non-compliance with this Policy may give rise to disciplinary, civil, administrative or criminal liability of the infringer, as applicable.

Whenever a breach of this Policy is identified, the EDP Group shall adopt appropriate and proportionate measures to cease the situation, mitigate its impacts, and prevent recurrence, including, where applicable, access restrictions, corrective actions, and other consequences provided under applicable legislation and internal regulations.

Any employee, member of the governing bodies, or third party who identifies or suspects conduct that is not compliant with this Policy or applicable AI legislation must report it through the reporting channels made available by the EDP Group.

REFERENCES

- Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016
- OECD Principles on Artificial Intelligence
- ISO/IEC 42001:2023 — Artificial Intelligence Management System (AIMS)
- EDP's Code of Ethics
- Responsible AI Standard

DEFINITIONS

Other operational terms used in this Policy, including roles and procedural concepts, are defined in the Responsible AI Standard.

- **Artificial Intelligence (AI):** A set of technologies based on computational systems that, for human-defined objectives, generate outputs, such as content, predictions, recommendations or decisions, with varying degrees of autonomy, and which may influence physical or virtual environments.

- **AI Model:** A computational construct, trained on data to perform specific tasks and generate outputs such as predictions, classifications, recommendations or content, which can be integrated into one or more AI Systems.
- **AI System:** A machine-based system designed to operate with varying levels of autonomy that, for human-defined objectives, infers from input data how to generate outputs, such as predictions, content, recommendations or decisions, which may influence physical or virtual environments. The qualification of a solution as an AI System for the purposes of this Policy is made solely for internal governance, risk management and compliance purposes.
- **AI Asset:** Practical and integrated application of AI used within the EDP Group to support professional activities, processes or decisions. For the purposes of this Policy, the term AI Asset is an internal governance category and may include, individually or cumulatively, AI Systems and/or AI Models.
- **AI Asset Lifecycle:** The set of phases through which an AI Asset passes, from design, development or acquisition, implementation, use, monitoring, significant modification and discontinuation.
- **Employees and Third Parties:** All individuals who, within the scope of their professional relationship with the EDP Group, including employees, members of governance bodies, service providers and suppliers, access or interact with the EDP Group's AI Systems, regardless of the legal nature of their relationship.
- **AI Inventory:** A centralized record of the AI Assets used within the EDP Group, intended to ensure governance, traceability, monitoring and compliance support.
- **Unacceptable Risk:** AI Systems that manipulate behavior, exploit vulnerabilities, or result in harmful or discriminatory outcomes, and whose use is prohibited under applicable legislation.
- **High Risk:** AI Systems that may significantly impact individuals' rights, safety, or access to essential services, or are used in critical or regulated domains.
- **Medium Risk:** AI Systems that interact with individuals or generate or manipulate content, potentially affecting transparency, perception, or trust.
- **Low Risk:** AI Systems not classified as Unacceptable, High, or Medium Risk, with limited impact on individuals' rights, safety, or decision-making.