



EDP Group

Human and Labour Rights Policy

Sets out commitments, governance and due diligence approach to respect and protect internationally recognised human and labour rights across company's chain of activities.

Disclosure: Public

Index

- 1. VERSION HISTORY 2
- 2. OBJECTIVE 2
- 3. SCOPE 2
- 4. OBJECT 3
 - 4.1 Commitments 3
 - 4.2 Responsibilities 5
 - 4.3 Human Rights Due Diligence 6
 - 4.3.1 Risk assessment 6
 - 4.3.2 Prevent, cease, mitigate and remediate 6
 - 4.3.3 Monitoring and tracking implementation 7
 - 4.3.4 Communication, transparency and accountability 7
 - 4.4 Reporting Channels 7
- 5. FINAL PROVISIONS 8
- REFERENCES 8
- DEFINITIONS 10

1. VERSION HISTORY

Version	Date of Approval	Elaboration	Approval	Comment / Revoke
1	16/05/2017	Sustainability Department	Executive Board of Directors (EBD)	Initial Issuance
2	27/07/2021	Sustainability Department	EBD	Revision
3	26/05/2026	IR&ESG	EBD	Revision – Revokes OS 2/2022/CAE, 26 July
	Main Changes: <ul style="list-style-type: none"> – Revision based on international standards and conventions, and regulatory framework under discussion; – Stronger and clearer human rights commitments, underpinned by a risk-based due diligence approach; – Introduction of a formal Human Rights Due Diligence framework, aligned with OECD standards; – Enhanced transparency and disclosure, in line with CSRD and CSDDD requirements; – Adaptation of the policy to the new governance model. 			

2. OBJECTIVE

This Policy defines the EDP Group’s commitments and responsibilities to ensure the respect for Human and Labour Rights across business operations and throughout its chain of activities, supporting a just and inclusive energy transition.

It is grounded in the UN Global Compact principles, aligned with the UN Guiding Principles on Business and Human Rights, and supported by the main international conventions relevant to this field, and by the International Labour Organization Fundamental Principles and Rights at Work and Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy. Additionally, it sets out the governance structure and the due diligence principles that guide its implementation, drawing on the OECD Due Diligence Guidance for Responsible Business Conduct.

3. SCOPE

This Policy, as well as the duties and commitments set out therein, applies to all companies and entities that are part of the EDP Group, as well as to the structures that make up the current matrix structure, namely Platforms, Regions, Business Enablement Functions (BEFs), Global Business Services (GBS) always in strict compliance with the legal framework in the geographical areas where the Group operates and without prejudice to the necessary operational adaptations at local level. When implementing this Policy, the EDP Group undertakes to respect applicable international treaties and internationally recognised standards.

The commitments set out in this Policy extend to all individuals and groups whose human and labour rights may be affected by EDP Group's chain of activities. This includes, namely, EDP employees¹, contractors, workers in the supply chain, suppliers and other business partners, customers and local communities. The application of these commitments across business operations and the chain of activities is guided by EDP's level of involvement, leverage and due diligence responsibilities.

4. OBJECT

4.1 Commitments

The EDP Group reaffirms its commitment to respect, defend and promote fundamental human and labour rights in accordance with the international conventions, norms and guidelines referred to in chapter 0 of this Policy.

Considering the nature of EDP's activities and business relationships, EDP sets out below its key human and labour rights commitments, which apply across all regions where the Group operates, both within its own operations and throughout its chain of activities.

Child labour: EDP repudiates all forms of child labour and applies a zero-tolerance policy to any direct or indirect employment of children or adolescents in breach of applicable law, throughout its operations and chain of activities. EDP respects the legal minimum age for work and prohibits any activity that may compromise the physical or mental health, development or schooling of children and adolescents².

Forced labour: EDP does not accept any form of forced, compulsory, slavery-like or modern slavery labour and is committed to preventing and ending such practices throughout its operations and chain of activities. This includes coercion, threats, retention of identity documents, debt bondage, human trafficking or any other form of exploitation³.

Working time: EDP ensures that working hours within its operations comply with applicable labour legislation, respects legal limits, rest periods and mandatory breaks, and expects its business partners to comply with similar principles. EDP is also committed to promote employees' work-life balance and support practices consistent with the right to disconnect, recognising employees' ability to disengage from work outside established working hours⁴.

Working conditions: EDP guarantees the formalization of work relationships from the outset, ensuring that all employment contracts clearly outline the terms and conditions of employment, such as paid annual leave, working hours, and adherence to applicable collective labour agreements. EDP also commits to fair termination processes, with defined notice periods and procedures⁵. Open communication and support are provided throughout, ensuring compliance with legal standards and best practices.

Fair remuneration: EDP is committed to providing fair remuneration for its employees and seeks to ensure remuneration is aligned with at least a Living Wage that supports well-being and a decent standard of living, following international recognized standards and promoting it across⁶. Beyond base remuneration, EDP is committed to providing a competitive package of benefits, perks and other measures to further enhance employees' quality of life, including in vulnerable stages such as

¹ And all the affected by the Employment Lifecycle process.

² ILO Conventions Nos. 138 (1973) and 182 (1999); CRC (1989)

³ ILO Conventions Nos. 29 (1930) and 105 (1957); ICRMW (1990)

⁴ ILO Conventions Nos. 1 (1919), 14 (1921), and 106 (1957)

⁵ ILO Conventions Nos. 158 (1982)

⁶ Such as Global Living Wage Coalition or Fair Wage Network

retirement, sickness, acquired injury or unemployment. EDP also upholds pay transparency and equal pay for equal work or work of equal value, regardless of gender or any other protected characteristic⁷.

Skills development: EDP promotes the continuous development of skills and ensures equal access to training and professional growth for its employees and encourages its business partners to provide fair opportunities for skills development and professional progression for their employees⁸.

Violence and harassment: EDP recognises violence and harassment as serious human rights violations and is committed to ensure safe, respectful and inclusive working environments. EDP seeks to prevent, identify and address any potential misconduct within its operations, adopting a zero-tolerance approach to such behaviour. EDP also expects its contractors and other business partners to uphold standards of conduct consistent with this commitment throughout its chain of activities.⁹

Health, safety and security: EDP adopts rigorous measures to ensure safe and healthy working environments promoting physical and mental wellbeing of employees, ensuring adequate comfort, safety and hygiene for field teams and contractors, and extending such expectations across its business partners. EDP also seeks to ensure its activities do not pose health or safety risks to consumers and local communities¹⁰. Where security support may be required, EDP ensures that any security personnel involved act in line with internationally recognized human rights standards and that any use of force is strictly necessary, proportionate, and does not involve intimidation or physical abuse¹¹.

Freedom of Association: EDP respects and protects the right of employees to freely form, join, and participate in trade unions or other representative organizations of their choice. EDP ensures that all employees can engage in collective bargaining without interference, retaliation, or discrimination. EDP ensures equal access to opportunities within its operations and promotes inclusive and respectful practices throughout its chain of activities¹².

Diversity, inclusion and equal access to opportunities: EDP values diversity and rejects all forms of abuse and discrimination namely based on race, ethnicity, colour, sexual orientation, gender, disability, origin, migration status, religion, age or any other personal characteristic. EDP is committed to ensuring equal access to opportunities throughout the employment lifecycle and to promoting accessible, inclusive and respectful working environments for its employees, providing reasonable adjustments when relevant. EDP also expects its business partners to uphold these principles in their activities and relationships¹³.

Right to privacy: EDP respects and protects the right to privacy of all its stakeholders and commits to ensuring that personal data and private life are respected across its business operations and chain of activities, namely employees, business partners, customers and local communities, always collecting, processing, using and storing personal data in an ethical, responsible and legally compliant manner¹⁴.

Territorial, property and cultural rights: EDP conducts its activities with respect for the territorial and property rights of local communities and for their cultural heritage, identity and ways of living. EDP recognises the distinct rights of indigenous peoples ensuring their effective, timely and informed

⁷ ILO Conventions Nos. 100 (1951) and 111 (1958); European Pay Transparency Directive (2023)

⁸ ILO Conventions Nos. 122 (1964) and 142 (1975)

⁹ ILO Convention No. 190 (2019)

¹⁰ ILO Conventions Nos. 155 (1981) and 187 (2006); ICESCR Art. 12 (1966)

¹¹ UDHR Arts. 3 and 5 (1948); ICCPR Arts. 6, 7 and 9 (1966); ILO MNE Declaration (1977); UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (notably the principles of legality, necessity, proportionality and last resort) (1990); VPSHR (2000)

¹² ILO Conventions Nos. 87 (1948) and 98 (1949)

¹³ ILO Conventions Nos. 111 (1958) and 100 (1951); ICERD (1965); CRPD (2006); CEDAW (1979);

¹⁴ ILO Convention No. 181 (1997) and all applicable personal data protection laws in all jurisdictions in which EDP operates

participation, in good faith and through their own representative processes, in decisions that may affect their lands, resources or cultural practices.¹⁵

Clean and healthy environment: EDP recognizes the right to a clean, healthy and sustainable environment and is committed to avoid and mitigate negative environmental impacts and ecosystem services degradation from within its operations and along its chain of activities. When expanding or maintaining its infrastructures, EDP also ensures that communities retain access to the basic environmental resources and ecosystem services that supported their well-being prior to EDP's presence in the region.¹⁶

Anti-corruption and bribery: EDP rejects all forms of corruption and bribery and recognises their detrimental impact on human rights. EDP upholds the highest standards of integrity and transparency across its operations and chain of activities.¹⁷

4.2 Responsibilities

EDP representatives on the governing bodies of controlled companies, whether based in Portugal or abroad, are responsible for ensuring that the necessary measures are taken and appropriate actions adopted to promote compliance with this Policy, as well as for aligning practices with the emerging requirements of the European Corporate Sustainability Due Diligence Directive (CSDDD).

To ensure the effective implementation of this Policy, the following governance structure is in place:

The **Corporate Governance and Sustainability Committee (CGSC)** of the **General and Supervisory Board (GSB)** exercise strategic oversight over sustainability-related matters, issuing opinions and recommendations, including on matters related to the respect for and protection of human rights.

The **Executive Board of Directors (EBD)** approves this Policy and is accountable for ensuring its effective implementation across the EDP Group. The EBD oversees the Human Rights Due Diligence (HRDD) system, supported by the Sustainability Committee¹⁸ and in alignment with EDP's Compliance Management System.

The BEF **Investor Relations & ESG (IR&ESG)**, in coordination with the BEFs Ethics & Compliance and People & Organization, is responsible for the operational coordination of human rights matter, namely through the management of the overall human rights' due diligence assessment process. Subject-specific matters will be governed by dedicated policies, guidelines and procedures developed by the relevant Centres of Excellence.

Regions and Platforms are responsible for ensuring the operational implementation of this Policy across geographies and business activities. Given their proximity to suppliers, customers and local communities, they play a key role in identifying, assessing and managing human and labour rights risks and adverse impacts, including through preventive, mitigating and remediation measures.

¹⁵ UNDRIP (2007), (notably Arts. 10, 11, 19, 28, 29, and 32); ILO Convention No.169 (1997); ICCPR Art 27 (1966); ICESCR Arts. 1, 11 and 15 (1966)

¹⁶ UN Resolution 76/300 (2022); ICESCR Art. 12 (1966); Convention on Biological Diversity Art.10(b) (1992); Basel Convention Art. 4 (1992)

¹⁷ OECD Anti-Bribery Convention (1997)

¹⁸ Internal committee with the responsibility of supporting the EBD in defining sustainability policies, practices and internal mechanisms, and contributing to the integrated management of EDP's ESG risks and opportunities

4.3 Human Rights Due Diligence

To support the implementation of this Policy, the EDP Group is committed to implementing a Human Rights Due Diligence (HRDD) process. This HRDD covers all relevant types of business relationships, as defined in the Scope chapter and is established as a preventive and continuous process, guided by the OECD Due Diligence Guidance for Responsible Business Conduct framework and EDP's Compliance Management System.

The HRDD process will follow a risk-based approach, structure in four main steps, which may be implemented and operationalised through subject-specific management systems already in place.

4.3.1 Risk assessment

For the application of the HRDD, human rights risks are an outward-facing approach to risk. A risk of adverse human rights impacts on employees, customers, local communities or other relevant business partners may exist when there is the potential for a behaviour that can violate this Policy.

Adverse impacts are identified, assessed and prioritized based on their severity and likelihood, taking into account the nature of the potential impact and the stakeholder groups affected. The process is put in place in an iterative and increasingly in-depth review.

The HRDD assessment is informed either by direct engagement with stakeholders or by indirect sources that may flag some potential concerns. Key instruments will be put in place to both support the assessment and monitor the effectiveness of the process, as further described in section 4.3.3.

Whenever applicable, these assessments are conducted under management systems in place, such as the Health & Safety Management System and Environmental Management System, and the Anti-Bribery Management System, all implemented in accordance with ISO 45001, ISO14001, and ISO 37001 respectively.

4.3.2 Prevent, cease, mitigate and remediate

The HRDD process is implemented as a preventive and continuous-improvement mechanism, aiming to avoid causing or contributing to adverse impacts on stakeholders, and to prevent impacts that are directly linked to EDP's operations, products or services, as well as throughout its chain of activities.

To ensure a proactive and systematic approach, prevention actions shall include the following key elements:

- 1) Have clear internal responsibilities for managing HRDD risks at senior and operational levels.
- 2) Have policies, guidelines and enforceable procedures, when needed, for all material topics to support prevention, mitigation and remediation of adverse impacts.
- 3) Apply internal HRDD guidance to ensure consistent identification, assessment and treatment of risks.
- 4) Leverage and reinforce existing management systems, ensuring they continuously evolve to address emerging risks.
- 5) Build internal capacities through targeted training and awareness initiatives for employees and management.
- 6) Map and engage stakeholders at an early stage to understand expectations, collect relevant insights and ensure informed decision-making throughout the business activity.

Whenever adverse impacts are identified, an action plan will be put in place for cease such impacts immediately, and a timely and fair mitigation plan is established to prevent future occurrences. If the adverse impact is identified in the company's supply chain, a corrective action plan will be proposed, with contract termination being used only as the last resource.

EDP will remedy any adverse impact directly linked to its operations to the extent within its control and, when applicable, support the provision of proportionate remediation mechanisms or cooperate with legitimate remediation mechanisms needed to address an adverse impact occurring along the company's chain of activities. For potential material risks, preventive and mitigation action plans will be put in place, and such risks are monitored more frequently.

4.3.3 Monitoring and tracking implementation

EDP's HRDD system will be monitored periodically, whenever there are reasonable grounds to believe that risks and impacts have changed, and benefits from in-depth analysis to assess the effectiveness of the process, in alignment with the Compliance Management System:

The following instruments support the risk assessment and monitoring processes:

- Speak-up channels and local stakeholder engagement mechanisms, which provide early signals of potential issues.
- Audit and inspection results, offering evidence of how human rights commitments are being implemented.
- Feedback from supplier engagement processes, gathered throughout the supplier lifecycle—from initial assessment to contract execution and closure.
- Environmental and social performance indicators, which help identify trends, emerging risks and material impacts.

4.3.4 Communication, transparency and accountability

EDP maintains communication channels at global and local levels to enable meaningful stakeholder engagement and ensure that information shared through these processes is duly acknowledged and appropriately considered in decision-making.

EDP publicly discloses relevant human rights information in a transparent, regular and accessible manner. This includes information on its human rights' due diligence processes, identified actual and potential risks, measures taken to prevent, mitigate or remediate adverse impacts, and the outcomes of these efforts. Such disclosures are aligned, where applicable, with EU sustainability reporting and due diligence requirements, including CSRD and CSDDD.

This information is made available on EDP's website, in its Annual Report, or through other appropriate communication channels.

4.4 Reporting Channels

EDP maintains secure, confidential and accessible reporting channels for employees, suppliers and other business partners, customers, local communities and other stakeholders to report unethical practices, such as human rights violations or breaches of legal and internal rules. These channels are available 24/7, allow anonymity and are managed to ensure impartial investigation, with safeguards against retaliation. All reports are handled through a structured process of investigation, response,

corrective and remediation actions where applicable. At project level, EDP also ensures the availability of local reporting channels and contact points.

Any potential violation of this Policy may be reported through EDP's "Speak-Up" channel in [edp.com](https://www.edp.com).

5. FINAL PROVISIONS

This Policy will be reviewed every three years or whenever there are circumstances that require this document to be amended. The review process may be initiated by any of EDP's BEFs represented in the Sustainability Committee. In such cases, the review shall be conducted by the proposing area, under the oversight of the IR&ESG BEF, in coordination with the BEF whose activities relate to the subject under review.

REFERENCES

Internal

- EDP Group Code of Ethics
- EDP Supplier Code of Conduct
- Stakeholder Relationship Policy
- EDP Local Stakeholder Engagement Policy
- Group EDP Environmental Policy
- Group EDP Diversity, Equity, Inclusion and Belonging Policy
- EDP Group Integrity Policy
- Whistleblowing Management Policy
- Group EDP Occupational Health and Safety Policy
- EDP Personal Data Protection Policy.

External

Due diligence and governance frameworks:

- 1) UN Guiding Principles on Business and Human Rights (2011)
- 2) OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023)
- 3) Directive (EU) 2024/1760 on Corporate Sustainability Due Diligence Directive (CSDDD) (2024)

International Bill of Human Rights, including:

- 4) Universal Declaration of Human Rights (UDHR) (1948)
- 5) International Covenant on Civil and Political Rights (ICCPR), (1966)
- 6) International Covenant on Economic, Social and Cultural Rights (ICESCR), (1966)
- 7) UN General Assembly Resolution 76/300 – Human right to clean, healthy and sustainable environment (2022)

Instruments protecting vulnerable persons and groups, including:

- 8) the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), (1965)
- 9) Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1979)
- 10) Convention on the Rights of the Child (CRC) (1989)
- 11) International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (ICRMW) (1990)
- 12) Convention on the Rights of Persons with Disabilities (CRPD), (2006)
- 13) Declaration on the Rights of Indigenous Peoples (Art. 10; 11; 19; 28; 29; 32) (UNDRIP), (2007)
- 14) Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (1990)
- 15) International Labour Organization (ILO) Declaration on Fundamental and Technical Principles and Rights at Work (1998, amended 2022):
 - a) Freedom of association and the effective recognition of the right to collective bargaining (Nos. 87 and 98)
 - b) Elimination of all forms of forced or compulsory labour (Nos. 29 and 105)
 - c) Effective abolition of child labour (Nos. 138 and 182)
 - d) Elimination of discrimination in respect of employment and occupation (Nos. 100 and 111)
 - e) Safe and healthy working environment (Nos. 155 and 187, Protocol 2002)
 - f) ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (ILO MNE Declaration) (1977)
 - g) Elimination of violence and harassment in the world of work (No. 190)
 - h) Respect for labour standards on working time (Nos. 1, 14 and 106)
 - i) Guarantee of payment of a living minimum wage (No. 131)
 - j) Respect for Freedom of Choice of Employment (No. 122)
 - k) Equal development and use of capabilities for work (No. 142)
 - l) Convention on Indigenous and Tribal Peoples (No. 169)
 - m) Private Employment and Data Protection (No. 181)
 - n) Employment Protection and unfair dismissal (No. 158)

European human rights and *social acquis*

- 16) European Convention on Human Rights (1950)
 - 17) Revised European Social Charter (1996)
- EU Labour Law Acquis
- 18) European Pay Transparency Directive (2023)
 - 19) Global Living Wage Coalition
 - 20) The Fair Wage Network

- 21) The Voluntary Principles on Security and Human Rights (VPSHR) (2000)
- 22) Convention on Biological Diversity (Art. 10b) (1992)
- 23) Basel Convention (Art. 4) (1992)
- 24) OECD Anti-Bribery Convention (1997)

DEFINITIONS

EDP supports this Policy in the following definitions, based on the different international standards used as references and, whenever necessary, adapted to the reality of the company.

Business Partner	Any entity with which EDP has a direct or indirect business relationship and whose activities are connected to EDP's operations, products or services. This includes suppliers, contractors, service providers, intermediaries, joint venture partners and other entities involved in EDP's chain of activities ¹⁹ .
Child labour	Any work carried out by a person below the legally permitted minimum age that interferes with compulsory education or is harmful to a child's health, safety or development. It includes all hazardous work and the worst forms of child labour ²⁰ .
Chain of activities	Includes EDP's operations, subsidiaries and relevant upstream business partners related to the production of goods or the provision of services, and downstream business partners related to the distribution, transport, and storage of the product ²¹ .
Due Diligence	Systematic process for companies to identify, prevent, mitigate and remedy to human rights violations or environmental impacts in their operations and supply chains ²² .
Employment Lifecycle	Includes recruitment, promotion, training, remuneration and termination.
Freedom of association and collective bargaining	The right of workers and employers to freely establish, join and participate in organisations of their own choosing, without interference, coercion or retaliation, and to engage in collective bargaining to determine terms and conditions of work. These rights enable workers and employers to act collectively to promote and defend their legitimate economic and social interests ²³ .
Forced labour	Any work or service exacted from a person under threat, coercion, intimidation or abuse of power, and for which the person has not offered themselves voluntarily. Forced labour includes practices such as debt bondage, modern slavery, human

¹⁹ Aligned with CSDDD (2024)

²⁰ Aligned with ILO Conventions, Nos. 138 (1973) and 182 (1999)

²¹ Aligned with CSDDD (EU) 2024/1760 (2024)

²² Aligned with CSDDD (EU) 2024/1760 (2024)

²³ ILO Conventions Nos. 87 (1948) and 98 (1949)

	trafficking for labour exploitation, restriction of freedom of movement, retention of identity documents, and other forms of involuntary labour ²⁴ .
Harassment	Form of violence and harassment that includes unwanted conduct, or a threat thereof, whether occurring once or repeatedly, that aims at, results in, or is likely to result in physical, psychological, sexual, or economic harm, including gender-based violence. ²⁵
Human rights	The universal, inherent and indivisible rights and freedoms to which all people are entitled by virtue of being human. They encompass civil, political, economic, social and cultural rights and aim to protect human dignity, equality and freedom, ensuring that all individuals can live and work in conditions of respect, safety and justice ²⁶ .
Human Rights Risks	Risks that a company’s activities or business relationships may cause, contribute to, or be directly linked to adverse impacts on people’s human rights. These risks are assessed based on the severity and likelihood of harm to people ²⁷ .
Labour Rights	Labour rights are the fundamental rights and protections related to work and employment that ensure fair, safe and dignified working conditions. They include, among others, the rights to freedom of association and collective bargaining, the elimination of forced and child labour, equality and non-discrimination in employment, fair remuneration, reasonable working hours, safe and healthy working conditions, and respect for workers’ dignity ²⁸ .
Living Wage	A remuneration sufficient to enable workers and their families to meet their basic needs and achieve a decent standard of living, including food, housing, healthcare, education, transport and other essential needs. A living wage differs from statutory minimum wages, which may not adequately reflect the cost of living or ensure a dignified life ²⁹ and is used by EDP as a guiding benchmark, considering each jurisdiction’s local wage-setting practices and labour market conditions.
Local communities	Groups of people living in, or having a close social, cultural, economic or environmental connection to, a specific territory that may be affected by business activities or projects. This includes indigenous peoples, traditional communities, and other local populations such as neighbourhoods, villages and towns ³⁰ .
Pay transparency	Practice of openly disclosing information on pay structures, salary ranges, criteria for progression, and the factors determining compensation decisions, enabling workers to understand how pay is set and identify potential inequalities ³¹ .

²⁴ ILO Conventions Nos. 29 (1930) and 105 (1957)

²⁵ ILO Convention No. 190 (2019)

²⁶ UDHR (1948); ICCPR (1966); ICESCR (1966)

²⁷ OECD DDGRBC (2018); CSDDD (EU) 2024/1760 (2024)

²⁸ ILO Declaration on Fundamental Principles and Rights at Work (1998); ICESCR Art. 6, 7 and 8 (1966)

²⁹ ILO Convention No. 131 (1970); OECD Guidelines for Multinational Enterprises (2011)

³⁰ ILO Convention No. 169 (1989); UNDRIP (2007)

³¹ ILO Convention No. 100 (1951)

Reinforced by recent EU directive on pay transparency, which aim to prevent discrimination and support equal pay for work of equal value.
