



Diversity, Equity, Inclusion and Belonging Policy

Provides an overview of EDP Group's approach to Diversity, Equity, Inclusion and Belonging (DEIB), outlining its principles, governance, responsibilities and implementation mechanisms to foster a fair, inclusive and accessible workplace.

Disclosure: Public



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1. VERSION HISTORY

Version	Date of Approval	Elaboration	Approval	Comment / Revoke
1	29/01/2013	Human Resources Department	Executive Board of Directors (EBD)	Initial Issuance
2	22/03/2017	Human Resources Department	EBD	Revision
3	17/05/2022	People & Organisational Development Global Unit	EBD	Revision
4	13/07/2026	People & Organization (P&O)	EBD	Revision – Revokes the version dated 17/07/2022
	Main changes: - Alignment with EDP's DEIB Strategy 2026–2028 and People Plan 2026–2028; - Strengthening of commitments, governance framework, accountability model and stakeholder responsibilities; - Enhancement of accessibility, equitable employee experiences, and monitoring and reporting mechanisms.			

2. OBJECTIVE

At EDP, Diversity, Equity, Inclusion and Belonging (DEIB) are fundamental to fulfilling EDP's purpose of creating a new energy for the planet. As a global organisation operating across diverse geographies, cultures and realities, EDP recognise that different perspectives, experiences and backgrounds strengthen its ability to innovate, collaborate and create long-term value for its people, business and society.

EDP is committed to attracting, developing, engaging, and retaining talent from diverse backgrounds and experiences, ensuring that everyone is treated fairly, has access to opportunities and feels respected, valued and empowered to contribute. EDP believes that people perform at their best when they can be themselves, share their perspectives and work in an environment built on trust, respect and collaboration.

EDP acknowledges that people may experience the workplace differently throughout their employee journey. Therefore, EDP seeks to understand and address barriers that may limit participation, development or access to opportunities, fostering an environment where all individuals can thrive and experience a guidance sense of belonging.

DEIB is embedded in the way EDP leads its people, shapes its culture and designs its policies, processes and employee experiences. By embedding DEIB principles into everyday decisions and organisational practices, EDP strengthens its ability to achieve the business objectives while fostering an environment where everyone can thrive, experience a sense of belonging and support their overall well-being.

Diversity, Equity, Inclusion and Belonging are distinct yet interconnected concepts¹ that help EDP understand how people experience the workplace, whether they feel represented, are treated fairly, have equitable access to opportunities and experience a genuine sense of belonging. Together, they support the creation of a workplace where everyone can contribute, grow and succeed, while helping EDP meet the opportunities and challenges of the energy transition.

3. SCOPE

This Policy 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”), and to all EDP employees.

The implementation of this Policy shall take into account local labour laws and regulations, as well as business requirements and operational needs, always in strict compliance with the legal and regulatory framework (including law, collective agreement, individual employment contract and any other recognised sources of labour law) applicable in each geography where the Group operates.

4. OBJECT

This Policy defines the responsibilities, governance mechanisms and practices through which EDP promotes DEIB across the organisation.

4.1. EDP Commitments

EDP is committed to fostering a workplace where Diversity, Equity, Inclusion and Belonging are embedded in its culture, leadership practices, people processes and decision-making. EDP recognises that creating an inclusive, equitable and accessible workplace is essential to attracting, developing, engaging and retaining talent, strengthening employee experience and supporting sustainable business performance. To support this commitment, EDP seeks to:

- **Promote equal opportunities:** Promote fair and equitable access to opportunities throughout the employee lifecycle, including attraction, recruitment, development, mobility, progression, recognition and retention;

¹ Details on DEIB in Definitions.

- **Foster an inclusive and respectful workplace:** Promote a workplace where people are treated with dignity and respect, feel valued for their unique perspectives and experiences, and can contribute authentically;
- **Support accessibility and remove barriers:** Identify and address barriers that may limit participation, development or progression, promoting accessible environments and equitable employee experiences across the organisation;
- **Strengthen inclusive leadership and accountability:** Encourage leaders at all levels to foster inclusive and psychologically safe environments, role model expected behaviours and support fair and informed decision-making;
- **Promote continuous improvement:** Strengthen DEIB-related practices through ongoing learning, employee feedback, monitoring and dialogue, supporting the evolution of a more inclusive, equitable and sustainable workplace.

4.2. Responsibilities

DEIB is a shared responsibility across EDP. All employees are expected to contribute to a workplace where people are treated fairly, with dignity and respect, and have equitable access to opportunities. In addition, specific stakeholders are responsible for embedding DEIB principles into EDP's culture, leadership practices, people processes and decision-making.

4.2.1. Executive Board of Directors

The Executive Board of Directors (EBD) provides oversight of DEIB-related commitments, objectives and outcomes across the Group. Key responsibilities include:

- Approving DEIB policies, commitments and strategic priorities;
- Promoting DEIB as a strategic priority across the Group and supporting its integration into business strategy and decision-making processes;
- Ensuring alignment between DEIB priorities, workforce sustainability and EDP's business objectives;
- Monitoring progress against DEIB commitments and objectives;
- Ensuring that DEIB considerations are appropriately reflected in governance and decision-making processes;
- Supporting the continuous advancement of DEIB across the Group.

4.2.2. Leadership Team

The Leadership Team ensures the oversight, alignment and governance of DEIB priorities across the organisation. Key responsibilities include:

- Reviewing DEIB progress, priorities, key initiatives and emerging risks;

- Promoting alignment between global ambitions and local realities;
- Supporting organisational decision-making related to DEIB priorities and initiatives;
- Monitoring progress against strategic objectives;
- Promoting collaboration and knowledge sharing across Platforms, Regions, and BEFs to support the effective implementation of DEIB priorities.

4.2.3. Talent Management Centre of Excellence

The Talent Management Centre of Excellence (CoE) is responsible for defining, coordinating and monitoring EDP's DEIB strategy and governance framework. Key responsibilities include:

- Defining DEIB priorities, frameworks and strategic guidelines;
- Coordinating implementation across Platforms, Regions, and BEFs;
- Monitoring progress through relevant indicators and reporting mechanisms;
- Supporting governance bodies through data, insights and recommendations;
- Promoting continuous improvement of DEIB practices, taking into account employee feedback, business needs and regulatory developments.

4.2.4. P&O Centres of Excellence

P&O CoEs are responsible for embedding DEIB principles into the design and evolution of people policies, processes, frameworks and tools. Key responsibilities include:

- Integrating DEIB principles into relevant people processes and employee experiences;
- Designing and maintaining inclusive policies, tools and frameworks;
- Promoting consistency and alignment across people practices;
- Identifying opportunities to improve equity, accessibility and inclusion across employee journeys;
- Collaborating with other BEFs to address emerging DEIB-related needs, challenges and opportunities.

4.2.5. P&O Business Partners

P&O Business Partners support the translation of EDP's DEIB strategy and priorities into business and local realities. Key responsibilities include:

- Supporting leaders in embedding DEIB principles into workforce and talent decisions;
- Promoting alignment between global priorities and local needs;

- Identifying local challenges, risks and opportunities that may impact employee experience, participation and representation;
- Providing feedback and insights to support the continuous improvement of DEIB initiatives and practices;
- Supporting the local implementation of DEIB priorities and action plans.

4.2.6.GBS People Services

GBS People Services supports the consistent, efficient and scalable delivery of DEIB-related processes and services across the organisation. Key responsibilities include:

- Supporting the implementation of standardised DEIB-related processes and services;
- Supporting data quality, monitoring and reporting activities;
- Enabling efficient and consistent employee experiences across relevant processes;
- Supporting the operational implementation of DEIB initiatives, where applicable;
- Contributing to the continuous improvement of systems and processes that support DEIB objectives.

4.2.7.Business Enablement Functions

Business Enablement Functions (BEFs) such as Communication, Brand, Digital, Ethics & Compliance, and Legal & Governance support the implementation of DEIB through their respective areas of expertise. Key responsibilities include:

- Supporting communication, employer branding and awareness initiatives that promote DEIB across the organisation;
- Ensuring alignment with applicable legal, regulatory, ethics and compliance requirements;
- Supporting accessibility and inclusive experiences across digital, physical and workplace environments;
- Providing specialist expertise to support DEIB-related priorities, initiatives and decision-making;
- Collaborating with P&O teams and other stakeholders to strengthen organisational awareness, engagement and accountability.

4.2.8.Managers

Managers play a critical role in shaping employee experience and ensuring that DEIB principles are reflected in day-to-day decisions and behaviours. Key responsibilities include:

- Fostering inclusive, respectful and psychologically safe team environments that support employee well-being;
- Promoting equitable access to opportunities related to recruitment, development, mobility, progression and recognition;
- Identifying and mitigating potential barriers and biases in people-related decisions;
- Listening and responding to employee feedback;
- Leading by example and reinforcing inclusive behaviours within their teams;
- Contributing to a culture of accountability, collaboration and belonging.

4.2.9. Employees

Every employee contributes to creating a workplace where people feel respected, valued and included. Employees are expected to:

- Treat others with dignity, respect and professionalism;
- Value and embrace different perspectives, experiences and backgrounds;
- Reflect on their own behaviours and challenge potential biases;
- Contribute to a workplace free from discrimination, harassment and exclusion;
- Promote inclusion, collaboration and belonging through everyday interactions;
- Act in accordance with EDP's values, ethical principles, policies and expected behaviours.

4.3. Implementation Mechanisms

EDP promotes the implementation of this Policy through a governance framework designed to support accountability, collaboration and continuous improvement across the organisation.

This framework aims to ensure that DEIB principles are embedded into leadership practices, people processes, employee experiences and organisational decision-making, while taking into account the different realities, cultures and legal requirements of the geographies where EDP operates.

The implementation of this Policy is supported by governance, monitoring, reporting, learning and feedback mechanisms that enable the effective oversight, measurement and continuous enhancement of DEIB practices across the Group.

4.3.1. DEIB Council Committee

The DEIB Council Committee serves as the primary governance forum for overseeing progress and supporting the implementation of EDP's DEIB commitments, bringing together senior leaders and strategic

stakeholders to promote alignment, accountability and informed decision-making on DEIB-related priorities. The DEIB Council Committee meets periodically, at least annually, to:

- Review progress against DEIB priorities, objectives and commitments;
- Discuss emerging challenges, opportunities and trends related to DEIB;
- Promote alignment across Platforms, Regions, and BEFs;
- Support the continuous improvement and evolution of DEIB initiatives, practices and governance mechanisms.

4.3.2. Monitoring and continuous improvement

DEIB implementation is supported by relevant metrics, employee feedback, and reporting mechanisms, subject to applicable data protection legislation, which enable the ongoing assessment of progress, the measurement of outcomes and the identification of opportunities for continuous improvement. Any collection, processing, use, disclosure or reporting of personal data for DEIB-related purposes shall be conducted in accordance with applicable data protection and privacy requirements.

4.4. Listening, Feedback, and Reporting Mechanisms

Creating an inclusive workplace requires continuous dialogue and active listening. EDP promotes mechanisms that enable employees to share feedback, raise concerns and contribute to the continuous evolution of DEIB-related practices and initiatives.

4.4.1. Feedback, questions, and suggestions

Employees are encouraged to share feedback, suggestions, questions or concerns relating to DEIB through the appropriate channels available within their teams, BEFs or People & Organisation structures. Employees may also contact the Inclusion Office at inclusion.office@edp.com

Feedback received through these channels may help identify opportunities for improvement and support the continuous improvement of DEIB-related initiatives, policies, and practices.

4.4.2. Reporting inappropriate conduct

EDP is committed to maintaining a workplace free from discrimination, harassment and other forms of inappropriate conduct.

Employees who observe or experience conduct that may be inconsistent with EDP's ethical principles, Code of Ethics or applicable policies are encouraged to report such situations through the Group's Ethics Channels available in the different geographies where EDP operates.

All reports are handled in accordance with applicable procedures and confidentiality requirements.

5. FINAL PROVISIONS

Any questions regarding the interpretation or application of this Policy should be directed to the Talent Management CoE, which will provide guidance and support where appropriate.

The Talent Management CoE is responsible for monitoring the implementation of this Policy and proposing updates whenever deemed necessary. This Policy will be reviewed periodically to ensure its continued alignment with EDP's strategic priorities, workforce needs, regulatory requirements and evolving organisational context.

REFERENCES

External References

United Nations

- [Universal Declaration of Human Rights \(1948\)](#)
- [International Convention on the Elimination of All Forms of Racial Discrimination](#)
- [Convention on the Elimination of All Forms of Discrimination against Women \(CEDAW\)](#)
- [Convention on the Rights of Persons with Disabilities \(CRPD\)](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [United Nations Sustainable Development Goals \(SDGs\)](#), particularly:
 - SDG 5 – Gender Equality
 - SDG 8 – Decent Work and Economic Growth
 - SDG 10 – Reduced Inequalities

International Labour Organisation (ILO)

- [ILO Convention No. 100 – Equal Remuneration Convention](#)
- [ILO Convention No. 111 – Discrimination \(Employment and Occupation\) Convention](#)

European Union

- [Corporate Sustainability Reporting Directive \(CSRD\)](#)
- [European Accessibility Act](#)
- [EU Pay Transparency Directive](#)

Global Standards and Reporting Frameworks

- Global Reporting Initiative (GRI)

- GRI 405 – Diversity and Equal Opportunity
- GRI 406 – Non-discrimination
- Other sustainability and governance frameworks adopted by EDP, where applicable

Internal References

- EDP Code of Ethics
- EDP Group Human and Labour Rights Policy
- EDP Business Plan 2026-2028
- People Plan 2026-2028
- DEIB Strategy 2026-2028
- Well-being Strategy 2026-2028
- Other people-related policies and procedures applicable to employee experience, talent management, accessibility and equal opportunities

DEFINITIONS

The following definitions are intended to support a common understanding of key concepts related to DEIB across EDP Group.

Accessibility: The design of environments, systems, technologies, services and processes in a way that enables all people, including persons with disabilities, to participate fully, independently and equitably;

Belonging: A sense of connection, acceptance and being valued within a group, team or organisation. Belonging reflects the extent to which individuals feel respected, supported and able to contribute authentically;

DEIB: An abbreviation for Diversity, Equity, Inclusion and Belonging;

Diversity: The variety of characteristics, experiences, perspectives and backgrounds that make individuals unique. Diversity may include, among others, age, ethnicity, nationality, gender, disability, religion, sexual orientation, educational background, professional experience, and ways of thinking;

Disability: A long-term physical, sensory, intellectual, cognitive or mental condition which, in interaction with environmental, social or organisational barriers, may affect a person's full and effective participation in society and the workplace on an equal basis with others;

Discrimination: Any distinction, exclusion or disadvantageous treatment based on personal characteristics or circumstances that, directly or indirectly, limits equal access to opportunities, rights or participation;

Equity: The principle of ensuring fair treatment, access, opportunities and advancement for all individuals, while recognising and addressing barriers that may affect people differently;

Human Rights: The fundamental rights and freedoms inherent to all human beings, regardless of nationality, gender, age, ethnicity, religion, disability, sexual orientation or any other characteristic;

Inclusion: The creation of an environment where all individuals feel welcomed, respected, supported and empowered to participate and contribute fully;

Inclusive Leadership: A leadership approach that values diverse perspectives, promotes participation, encourages open dialogue and creates conditions for all individuals to contribute and thrive;

Inclusive Workplace: A workplace where all employees feel respected, valued, supported and able to contribute, develop and succeed regardless of their background or personal characteristics;

Intersectionality: The way in which different aspects of a person's identity and lived experience may interact and create unique experiences of advantage, disadvantage or discrimination;

LGBTQIA+: An abbreviation that broadly refers to lesbian, gay, bisexual, transgender, queer/questioning, intersex, asexual and other diverse sexual orientations, gender identities and gender expressions;

Neurodiversity: The recognition that neurological differences are a natural part of human diversity and should be respected and valued in the same way as other forms of diversity;

Psychological Safety: A work environment where individuals feel comfortable expressing ideas, asking questions, sharing concerns and acknowledging mistakes without fear of negative consequences;

Race and Ethnicity: Social and cultural dimensions associated with ancestry, heritage, ethnic origin, nationality or other shared cultural characteristics;

Unconscious Bias: Attitudes, assumptions or stereotypes that influence judgement, decisions and behaviours in ways that may occur without conscious awareness;

Workforce Sustainability: The organisation's ability to attract, develop, engage and retain a diverse workforce with the skills, capabilities and wellbeing required to support long-term business performance and future workforce needs.