



Well-being Policy

Sets out EDP's approach to well-being, including the principles, commitments, governance, responsibilities and mechanisms that promote sustainable performance, flexibility and care throughout the employee experience.

Disclosure: Public

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Version History

Version	Date of Approval	Elaboration	Approval	Comment / Revoke
1	14/09/2026	People & Organization (P&O)	Executive Board of Directors (EBD)	Initial Issuance

1. OBJECTIVE

This Policy affirms EDP Group's commitment to making employee well-being an integral part of responsible business management and sustainable performance. It defines the principles and commitments that guide life-work integration, health, opportunities for personal and professional development, organizational resilience and a human-centred employee experience.

This Policy implements [EDP's Well-being Strategy](#) through a consistent Group-wide approach to well-being, life-work integration and the employee experience. It guides leadership practices, work organization, people processes, benefits and employee support, while allowing appropriate local adaptation. Well-being involves shared contributions within clearly defined roles: EDP remains responsible for providing appropriate conditions, governance and resources; leaders translate the commitments into daily practices within the scope of their role; and employees contribute to a respectful and supportive workplace.

2. SCOPE

This Policy applies to all companies and entities within the EDP Group, including Platforms, Regions, Business Enablement Functions (BEFs), Global Business Services (GBS), leaders and employees, subject to the applicable scope and requirements in each jurisdiction. It shall be implemented in accordance with applicable local law, collective bargaining agreements, regulatory requirements and mandatory employment practices, and may be adapted to relevant cultural, operational, workforce and role-specific contexts. Where such local requirements establish standards that differ from those set out in this Policy, the applicable local requirements shall prevail.

3. OBJECT

3.1 PRINCIPLES AND COMMITMENTS

At EDP, well-being is a strategic priority and an enabler of sustainable performance, organizational resilience and a human-centred employee experience. It supports the Group's ability to attract and retain talent, strengthen engagement and inclusion, manage occupational and psychosocial risks, and sustain performance through the energy transition and evolving ways of working.

EDP embeds well-being in how it leads, organizes work, makes decisions and supports people throughout the employee experience. The Group promotes healthy, safe, flexible, inclusive and trusting workplaces in which employees can contribute effectively over time while feeling respected and supported.

Well-being is a shared responsibility, but this does not transfer EDP's legal or organizational obligations to individuals. EDP remains accountable for providing appropriate working conditions and for identifying, preventing and mitigating physical, psychological and psychosocial risks, in accordance with applicable legislation. Leaders and employees are expected to contribute within the scope of their respective roles and responsibilities.

Employee well-being is multidimensional and may evolve across life stages, careers and personal circumstances. EDP addresses well-being through five interconnected dimensions:

1. **Physical** – promoting health, energy, safety and healthy working conditions;
2. **Emotional** – supporting mental health, resilience and psychological safety;
3. **Social** – strengthening connection, inclusion and belonging;
4. **Professional** – enabling growth, meaningful work and sustainable performance;
5. **Financial** – promoting financial stability, awareness and informed decisions.

These five dimensions provide the overarching framework for EDP's approach to well-being and are reflected across the four strategic commitments set out below. Implementation may be adapted to applicable legal requirements, cultural contexts, business realities, workforce needs, and role-specific conditions, while maintaining the principles and direction established by this Policy.

The following principles and commitments guide the implementation of this Policy and well-being-related decision-making across the EDP Group.

3.1.1 HUMANIZED LEADERSHIP AS A CATALYST FOR CULTURAL WELL-BEING GROWTH

Promoting employee well-being is an important leadership responsibility and an essential contributor to sustainable performance.

EDP commits to:

- embedding well-being principles in leadership practices, behaviours and decisions;
- promoting psychologically safe workplaces grounded in trust, respect and open dialogue;
- expecting leaders to model healthy, sustainable ways of working;
- preparing leaders to support employee well-being while contributing to sustainable business performance.

3.1.2 PROMOTE DIGITAL WELL-BEING

Technology, flexibility and evolving work practices offer significant benefits but require mindful use to protect employee well-being and sustainable performance.

EDP commits to:

- promoting healthy digital habits and responsible technology use;
- encouraging work practices that enable focus, recovery, collaboration and sustainable performance;
- fostering a culture that respects flexibility, personal boundaries and the right to disconnect, in accordance with applicable local laws and arrangements;
- adapting ways of working to evolving business and employee needs while supporting life-work integration.

3.1.3 PROMOTE MENTAL HEALTH AND BURNOUT PREVENTION

Mental health and the prevention of burnout, excessive workload and psychosocial risks are essential to protecting employees and sustaining organizational performance. EDP seeks to identify, assess and mitigate burnout and psychosocial risks through appropriate and reasonable preventive measures, responsible work design, early identification of risks and access to available professional support, in accordance with applicable law and having regard to the relevant circumstances.

EDP commits to:

- identifying, assessing and managing stress, workload, burnout and other psychosocial risks through appropriate preventive measures, in accordance with applicable law;
- integrating psychosocial risk assessment and preventive measures into relevant occupational health, safety and people management processes;
- building leadership awareness and capability to recognize potential well-being concerns, respond appropriately within the scope of their role and direct employees to available professional support;
- providing access to appropriate and confidential professional support;
- supporting employees during difficult periods and facilitating sustainable reintegration after stress-related absences, in accordance with applicable legislation and local arrangements.

3.1.4 ENSURE A HOLISTIC WELL-BEING APPROACH ACROSS LIFE DIMENSIONS

EDP applies a holistic approach that recognizes the interconnected physical, emotional, social, professional and financial dimensions of well-being. These dimensions are addressed throughout the employee experience through initiatives, resources and support mechanisms that evolve with employees' needs across life stages, professional journeys and personal circumstances, while remaining aligned with business requirements and local contexts.

EDP commits to:

- embedding well-being considerations throughout the employee lifecycle and relevant people management practices;
- supporting employees through key life moments, transitions and personal circumstances (which may include parenthood, caregiving responsibilities, health-related situations, disability-related needs, career transitions, critical personal circumstances and retirement), while promoting access to appropriate well-being resources and support mechanisms;
- supporting the delivery of initiatives, programmes and support mechanisms guided by common global principles and reference standards, subject to applicable law, eligibility criteria, business requirements and local implementation arrangements;
- fostering a culture of care, inclusion, belonging and shared responsibility, reinforced through employee engagement, communication and continuous listening.

3.2 IMPLEMENTATION MECHANISMS

EDP implements this Policy through a governance and operating model that integrates well-being into leadership, work practices, employee support, benefits, communication and people processes.

Implementation is supported by:

- global well-being and benefits frameworks, reference standards, guidelines and annual priorities, subject to applicable local requirements and implementation arrangements;
- local adaptation and implementation by Regions, Platforms and P&O teams;
- employee listening through surveys, focus groups and feedback channels;
- communication that increases awareness, accessibility and understanding of well-being resources;
- monitoring relevant indicators, usage data and employee feedback; and
- continuous improvement informed by data, business needs, regulatory developments and external benchmarks.

The People & Organization (P&O) CoE Compensation, Benefits, Well-being and Labor Relations owns the global policy, strategy and frameworks and coordinates their implementation. Delivery is shared with GBS Well-being & Occupational Health, GBS Compensation & Benefits, Regions, Platforms, local P&O teams and relevant Business Enablement Functions, in accordance with the accountabilities set out in section 3.3.

3.3 RESPONSIBILITIES

Effective implementation requires clear accountability across governance, leadership and operations. EDP applies a shared-responsibility model that aligns strategic direction, global coordination and local execution.

(i) Executive Board of Directors (EBD)

- Approves this Policy;
- Sets the Group's strategic direction for life-work integration and employee well-being;
- Oversees implementation and promotes integration of its principles into leadership and people management practices.

(ii) General and Supervisory Board (GSB)

- Within its statutory and internal governance responsibilities, monitors and assesses matters relating to corporate governance, sustainability and internal codes of ethics and conduct, and may issue opinions or recommendations on those matters.

(iii) Corporate Governance and Sustainability Committee (CGSC)

- As a specialised committee of the GSB, supports and monitors the definition and implementation of relevant sustainability policies and strategies, including, where relevant, matters relating to organisational culture, leadership and employee well-being.
- Reports to the GSB and may issue recommendations to the GSB and the EBD in accordance with its Internal Regulations.

(iv) CoE Compensation, Benefits, Well-being & Labor Relations

- Defines global life-work integration and well-being strategies, frameworks and guidelines;
- Ensures alignment with the well-being Strategy and People Plan;
- Integrates well-being into leadership practices and people management processes;
- Reviews and updates the Policy based on employee insights, business needs and external developments.

(v) Global Business Services (GBS People Services, Well-being & Occupational Health)

- Implements well-being initiatives, employee support services and related programs;
- Supports the consistent delivery of benefits, programs and employee support mechanisms, subject to applicable law, eligibility criteria, business requirements and local implementation arrangements;
- Monitors relevant data, participation and impact indicators to support continuous improvement.

(vi) Communication, Brand and Investor Relations & ESG BEFs

- Support internal and external communication of EDP's life-work integration commitments, programs and initiatives;
- Ensure communications are clear, accessible and aligned with EDP's employer brand, sustainability narrative and reporting priorities;
- Support disclosure of relevant aggregated information on employee support programs, reach, participation and impact, subject to confidentiality and data protection requirements.

(vii) Ethics & Compliance, Legal & Governance, Safety, Security & Business Continuity BEFs and relevant BEFs

- Support compliance with applicable legal, ethical, occupational health and safety requirements;
- Provide relevant technical guidance on the design, implementation and review of initiatives under this Policy;
- Support the identification and management of risks and impacts relating to employee well-being, working conditions, and occupational health and safety.

(viii) Regions and Platforms

- Adapt and implement this Policy locally, reflecting applicable legal, cultural and operational contexts;
- Ensure compliance with local requirements and internal guidelines;
- Identify and address risks and opportunities relating to employee well-being and working conditions;
- Align local practices with global principles.

(ix) Leaders at all levels

- Model well-being in daily decisions and team practices;
- Promote sustainable performance, psychological safety and healthy ways of working;
- Promote sustainable workload management, taking into account business requirements, individual circumstances and healthy working boundaries;
- Direct employees to available resources and support mechanisms, where appropriate, during significant life events, transitions and challenges.

(x) All employees

- Contribute to a respectful, inclusive and supportive work environment;
- Make appropriate use of available well-being resources, programmes and initiatives;
- Respect colleagues' boundaries, dignity and confidentiality.

3.4 MONITORING, REPORTING AND CONTINUOUS IMPROVEMENT

EDP encourages employees to share feedback, questions and suggestions related to well-being through leaders, People & Organization, GBS Well-being channels and other locally available mechanisms.

The P&O CoE Compensation, Benefits, Well-being & Labor Relations coordinates monitoring of implementation and effectiveness using proportionate qualitative and quantitative information. Inputs may include employee surveys, well-being and psychosocial risk assessments, aggregated support-program insights, participation and awareness indicators, focus groups, leadership and local implementation feedback, and external benchmarks.

These insights are used to identify risks and improvement priorities, strengthen accountability, adapt support mechanisms and assess whether the Policy remains relevant and effective across roles, geographies, life stages and workforce needs.

To support the effective and responsible monitoring of this Policy:

- Monitoring and reporting activities shall use aggregated or effectively anonymised information wherever this is appropriate and compatible with their purpose. Where pseudonymised data is used, it shall continue to be treated as personal data and processed in accordance with applicable data protection requirements and EDP's internal privacy policies and procedures.
- Any collection, access, processing, analysis, use, disclosure, reporting or retention of personal data relating to well-being, health, employee support programmes or related initiatives shall be carried out in accordance with applicable data protection laws and EDP's internal privacy policies and procedures. Personal data shall be processed only where necessary, proportionate and legally justified, and shall be limited to what is adequate and relevant for the applicable purpose.
- Health-related information is managed in accordance with applicable legal requirements and professional confidentiality obligations and may be subject to additional protections or restrictions under local legislation.
- No employee shall be subject to retaliation, discrimination or other unjustified adverse treatment because they provide feedback, participate in well-being initiatives or access available support mechanisms.

Where appropriate, EDP may disclose aggregated information on well-being priorities, employee support programs, participation, awareness, usage and impact through internal and external reporting channels, subject to applicable confidentiality, data protection and reporting requirements.

4. FINAL PROVISIONS

The P&O CoE Compensation, Benefits, Well-being & Labor Relations is responsible for coordinating implementation monitoring and reviewing this Policy at least every three years, or earlier when required by regulatory, strategic, organizational, business or workforce developments.

This Policy does not create individual contractual rights, guaranteed benefits or enforceable employment conditions beyond those provided by applicable law, collective bargaining agreements, employment contracts or applicable local company policies.

Eligibility, availability and access to specific benefits, programmes and support mechanisms may vary according to applicable local legal requirements, business needs, employment status, job requirements and other objective, reasonable and non-discriminatory criteria.

Where applicable local law, collective bargaining agreements, regulatory requirements or mandatory employment practices establish standards that differ from those set out in this Policy, the applicable local requirements shall prevail.

Any material inconsistency between this Policy and applicable local legal requirements shall be referred to Legal & Governance and People & Organization for review, assessment and appropriate resolution.

REFERENCES

INTERNAL POLICIES

This Policy is interrelated and supported by the following Group Policies:

- [EDP Group Code of Ethics](#)
- [Group EDP Diversity, Equity, Inclusion and Belonging \(DEIB\) Policy](#)
- [Human and Labor Rights Policy](#)
- [Group EDP Health and Safety Policy](#)

COMPLEMENTARY DOCUMENTS AND FRAMEWORKS

- Global Benefits & Perks Framework and Report
- Well-being Strategy 2026/2028
- Employee Assistance Program / Support Lines
- Right to Disconnect Guidelines
- Hybrid Work Model Guidelines
- People Plan 2026/2028

EXTERNAL REFERENCES

This Policy aligns with internationally recognized frameworks and standards on human rights, labour rights and responsible business conduct.

In particular, it supports EDP's commitment to:

- the Ten Principles of the United Nations Global Compact;
- the International Labor Organization's Fundamental Principles and Rights at Work; and
- the World Health Organization's (WHO) [Well-being Framework](#);
- the WHO International Classification of Diseases (ICD-11) – [Burn-out](#) (QD85).

These references guide EDP's approach to life-work integration, aligning global standards, business priorities and employee well-being.

5. DEFINITIONS

The following definitions support a common understanding of the concepts used throughout this Policy, based on international standards and adapted to EDP's context.

Life-Work Integration	EDP's approach to supporting employees in sustainably balancing professional and personal responsibilities through leadership practices, flexible ways of working, healthy digital behaviours, employee support mechanisms and well-being initiatives.
Employee Engagement	Employee engagement reflects employees' emotional and intellectual commitment to EDP, demonstrated through enthusiasm for their work, positive contributions to organizational culture and alignment with the Group's goals. EDP regularly monitors engagement and listens to employees through surveys and other feedback channels, using their views on happiness, well-being and related matters to inform continuous improvement.
Benefits & Perks	Benefits and perks are employee offerings provided in addition to base salary, such as health coverage, retirement plans, well-being programs, flexible spending accounts and other support measures. Aligned with EDP's well-being strategy, they address employees' physical, emotional, social, professional and financial well-being, while responding to diverse needs and helping attract, engage and retain talent.
Burnout	Burnout is an occupational phenomenon resulting from chronic workplace stress that has not been successfully managed. It is characterized by feelings of energy depletion or exhaustion, increased mental distance from one's job, or feelings of negativism or cynicism related to work, and reduced professional efficacy. This definition is aligned with the World Health Organization (WHO) International Classification of Diseases (ICD-11).
Employee Assistance Program (EAP)	Confidential professional support for employees and, where applicable, their families, addressing personal, emotional, psychological, legal, financial or social challenges in line with local arrangements.
Employee Support Programs	Company-sponsored initiatives, services, benefits, perks and workplace arrangements that support employees' physical, emotional, social and financial well-being and help them balance professional, personal, family and caregiving responsibilities. Programs may be adapted to local needs, legal requirements and workforce priorities.
Global Benefits Framework	The Group-wide framework that defines common principles, governance and reference standards for designing, delivering and evolving employee benefits. It includes the Global Minimum Package and Global Benefits, with implementation subject to applicable law, eligibility criteria, business requirements, local arrangements, market practices and workforce needs.

Global Benefits	The broader portfolio of benefits defined at Group level, which may include the Global Minimum Package and additional benefits made available across eligible geographies or employee populations, subject to applicable implementation conditions.
Global Minimum Package	The minimum set of employee benefits, perks and support measures established by EDP as the common Group-wide foundation for employee well-being and experience. While EDP aims to promote broad and consistent availability of this package across geographies, implementation remains subject to applicable law, local requirements, eligibility criteria and operational arrangements. Regions and countries may supplement this package with additional Global Benefits and/or local benefits.
Psychological Safety	A work environment in which individuals can voice ideas and concerns, ask questions and acknowledge mistakes without fear of unjustified adverse consequences. Psychological safety fosters trust, open dialogue, collaboration and learning, enabling effective teamwork, innovation and sustainable performance. It does not eliminate the need for professional accountability, performance management, constructive feedback or legitimate business decisions.
Sustainable Performance	The ability to deliver business results while preserving employees' health, energy, engagement and capacity to perform over time.
Ways of Working & Flexibility	Work practices, models and arrangements that enable collaboration, autonomy, productivity and well-being, while reflecting business needs, role requirements and local regulations.
Well-being	A holistic, multidimensional concept encompassing physical, emotional, social, professional and financial dimensions and supporting employees' health, development and capacity for sustainable performance.