

We give everyone a voice

At EDP we believe that speaking openly about the concerns we have that relate to the way we act in the workplace is crucial for creating a good environment and for the commitment and empowerment of each one of us, which is essential to the performance of excellence that EDP pursues. This openness in addressing concerns or even complaints must be adopted with all stakeholders, for the sake of transparent, upright and constructive relationships.



A **frank conversation** between the parties decisively contributes to increasing the psychological security of both individuals and teams, and that its effect on results is, for employees, differentiating. However, if such a conversation is not enough, and we are faced with an experience or observation of behaviour that we believe to be in conflict with the Code of Ethics we must report it. The **report** must be comprehensive, and based in good faith; a report made in bad faith or of a slanderous nature will not be accepted and may even constitute a disciplinary offence, under the terms and for the purposes of the applicable laws and regulations.

It is desirable that the concern, request for information or claim, where employees are concerned, can be resolved through their management. Leaders have a special responsibility in listening to these concerns and acting on them, and this is a path that should be followed as it strengthens trust among everyone. However, and where this is not possible, employees – and other stakeholders likewise – may refer directly to the **Ethics & Compliance Officer** or report their concern or claim at the [Speak up Channel](#).

Through the channels available for this purpose, reporting will follow a **robust, effective and efficient management process**, supported by an independent governance model – which includes the Ethics Commissions of EDP and EDP Renováveis, and the Ethics & Compliance Officer – where the confidentiality of whistleblowers is fully ensured.

All reports may also be made anonymously. This process can be found in detail in the [Whistleblowing Management Policy](#).

The obligation of “**non-retaliation**” is an essential aspect of the process for reporting potential breaches of the Code of Ethics. In fact, EDP prohibits any form of reprisal – overt or subtle – against anyone making a report and considers that retaliation is itself a breach of the Code of Ethics and may be subject to disciplinary action. Retaliation against an employee who signals a potentially ethical situation damages the Company’s trust and reliability; on the other hand, this act may also expose the Company to serious legal risk.

At EDP we believe that the freedom to report unethical conduct, based on the essential principle of good faith, is an essential component of an open organisational culture, where employees feel supported in doing the right thing.

2.1 Relationship with Shareholders

Related information

- [Investors](#)
- [Code of Conduct for Top Management and Senior Financial Officer](#)
- [Stakeholder Relationship Policy](#)
- [Sustainability Commitments](#)
- [Financial Management Policy](#)
- [Corporate Risk Management Policy](#)
- [Whistleblowing Management Policy](#)

[Practical Cases](#) ↗
[Questions & Answers](#)

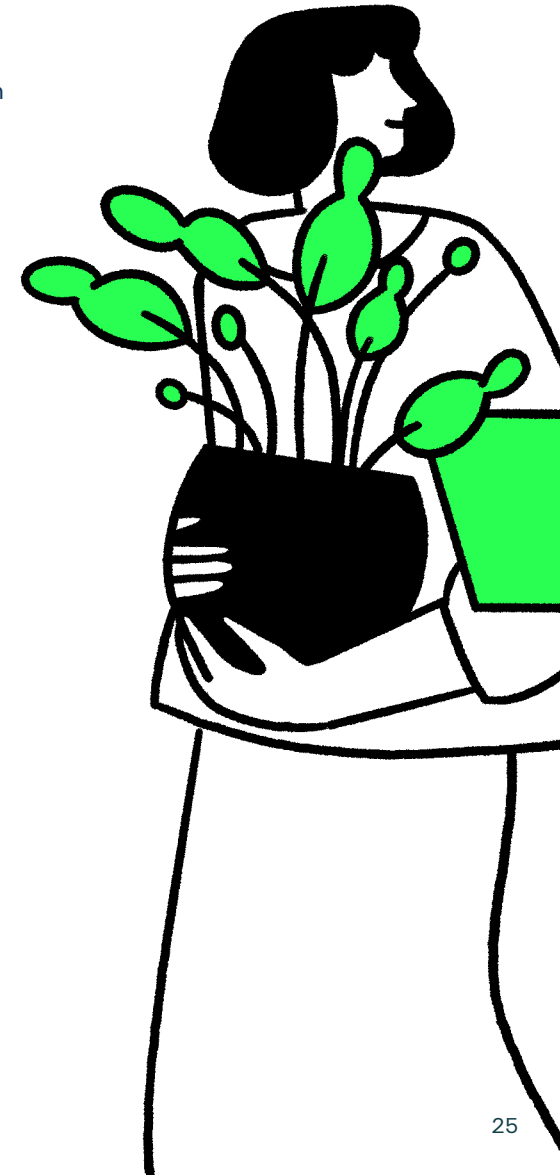
[Speak Up](#) ↗

EDP is **committed to creating value** for its shareholders.

“Shareholder value” is supported in strategic decisions that influence the sustainability of the Company’s various businesses, excellence in execution and the delivery of solid results according to plan.

Shareholder confidence, decisive for investment in the development of the Company, is thus a counterpart to the crucial choices made, such as the anticipated investment in the massive production and use of renewable energies, together with a robust sustainability policy, materialised in particular through the active contribution of various international commitments in terms of human rights, labour, the environment and the fight against corruption.

In complex and demanding contexts in which factors such as regulation, government policies and the evolution of markets and economies, among others, significantly condition the Company’s performance, EDP honours its commitments to this important stakeholder **through firm action in which integrity and transparency** are also essential.



4.5 Privacy and Personal Data Protection

Related information

[Ethics & Compliance](#)

[Personal Data Protection Policy](#)

[Whistleblowing Management Policy](#)

[Practical Cases](#) ↗
Questions & Answers

[Speak Up](#) ↗

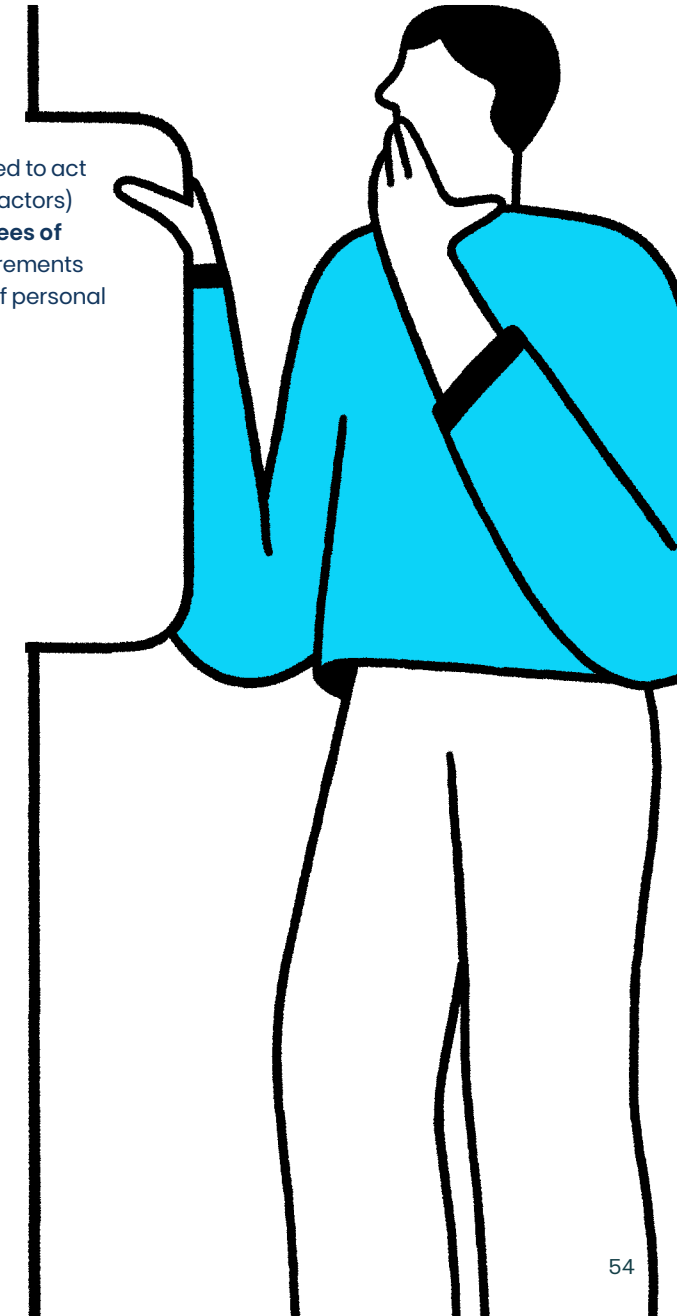
Privacy is a fundamental right.

The legislation on personal data grants the data subjects a set of specific rights aimed at ensuring their **privacy and the protection of their personal data**.

EDP collects, processes and retains personal data to the extent strictly necessary for the achievement of its purposes.

EDP has policies and procedures to ensure the **privacy, security and protection** of the personal data of all its employees, job applicants, customers, suppliers and other subcontracted entities and stakeholders in general.

Service providers authorised to act on behalf of EDP (subcontractors) must also provide **guarantees of compliance** with the requirements of privacy and protection of personal data.



4.6 Use of Company Information

Related information

[Information Security Policy](#)

[Whistleblowing Management Policy](#)

Practical Cases 
Questions & Answers

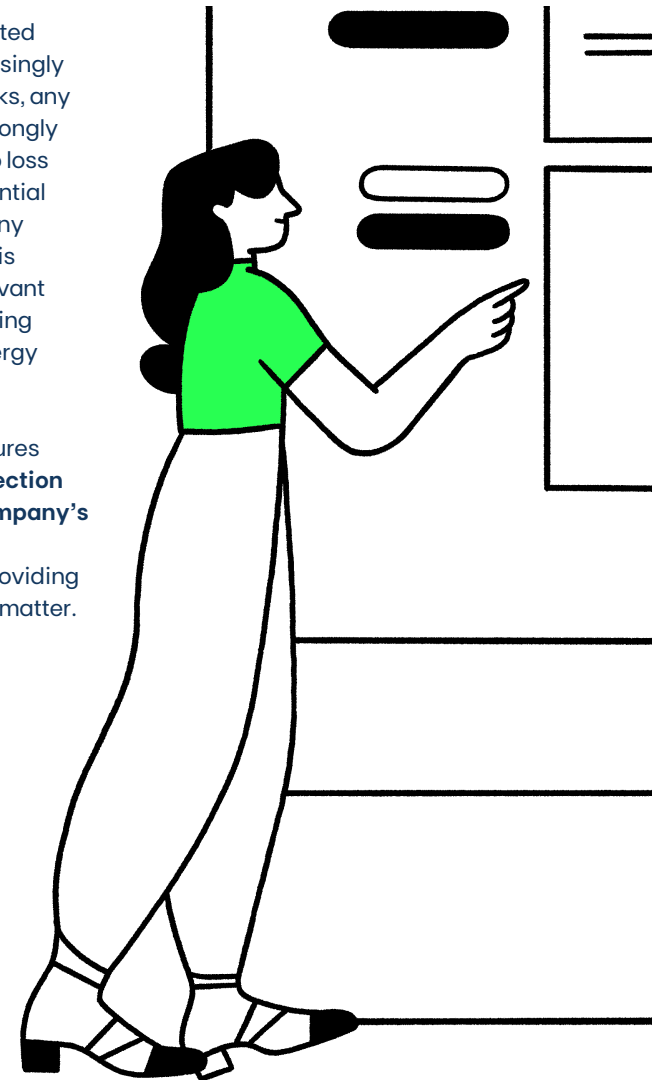
Speak Up 

Information is a fundamental business resource, so it's appropriate and responsible management is not only vital to generate added advantages over the competition in terms of innovation, institutional image and competitiveness along the value chain, but also to reduce the risk of its misuse, whether intentional or not.

Therefore, since information is an essential part of EDP's assets, we take care not only of its **confidentiality**, protecting it from disclosure to unauthorised persons, but also of its **integrity**, protecting it from undue alteration, and also of its availability, ensuring that it is accessible wherever and whenever it is needed.

In a permanently interconnected world, namely with the increasingly frequent use of social networks, any incorrect, inappropriate or wrongly timed information can lead to loss of value and generate substantial negative consequences for any company's image. At EDP, this fact becomes even more relevant as it is responsible for managing and safeguarding critical energy infrastructures.

EDP has policies and procedures that allow the adequate **protection and management of the Company's information** and that of its stakeholders in addition to providing training to employees on this matter.



4.7 Use of Assets

Related information

[Information Security Policy](#)

[Whistleblowing Management Policy](#)

The assets, whether tangible or intangible, of companies or third parties entrusted to us include the multiple and diverse resources that are made available to employees to carry out their daily work, including in the hybrid or remote model.

We have a duty to **protect and responsibly use the resources in our care**, including for example computers, vehicles, intellectual property and our own time, knowing that if misused or wasted, they adversely affect our individual and collective performance and therefore the value of the Company.

EDP has policies and procedures that ensure **the management of its own property assets** and those of third parties entrusted to it, with a view to **safeguarding their value**.



[Practical Cases](#) ↗
Questions & Answers

[Speak Up](#) ↗

Examples

Question:



I was asked to analyse a possible future investment by EDP in a new region from the perspective of my area. The following day, I was tipped off by a colleague that I would have to give feedback that same day, as the decision was about to be made at the Investment Committee level since the project had an above average return. Should I shorten the procedures, skipping some analyses, in order to give an answer within that period?

Answer:

No. Any new investment option should be carefully considered. It must always be ensured that all risks, which can be discerned at the time of decision making, are analysed and taken into account. If you are unable to respond within the set time frame, you should provide all the information and analysis you have available, warning transparently that it has not been possible to complete the analysis process. Informed decision-making is crucial to ensuring the success and sustainability of EDP's investments.

Question:



When analysing a potential partner of EDP in a new business, my team's study took into account several risk criteria, namely financial and profitability ones. Should I also ensure the ethical and integrity assessment of the elements that make up the partner's future management team if the deal comes to fruition?

Answer:

Yes, and indeed EDP already takes this analytical aspect into account. The risk assessment of the partnership from the ethics and integrity standpoint is essential, so that any new relationship with third parties does not compromise EDP's reputation from any point of view. Economic Performance robustness is also based on the pillar of Ethics and integrity in business. It is essential to ensure that all EDP partners maintain the highest standards of ethics and integrity, thereby ensuring sustainability and trust in business.

Examples

Question:



Our email distribution Service Provider has informed us that a significant number of emails to Customers have been sent to switched email addresses. I do not yet have information on what caused this error. Should I report it?

Answer:

Yes. Whenever you become aware of an incident involving personal data and even if you do not yet have all the information on it, you should report it immediately to Ethics & Compliance.

Question:



I know that one of our partners urgently needs to hire an accountant and I know that one of our clients has exactly the right profile. As it is for the benefit of the customer, can I provide their data to that partner?

Answer:

No. The personal data we have access to shall not be processed for purposes other than the purpose for which it was collected, unless there is explicit consent of the data subject or other legal grounds for doing so.

Question:



I am preparing a campaign of commercial offers to our customers, which includes gifts for personal use, and I think that it would be ideal to make the corresponding selection in an automated way, based on profiles and personal information. Can I do this?

Answer:

No. Profiling and automated individual decision-making are only possible if there is explicit consent of the data subject or other legal grounds for doing so.

Question:



I want to send a surprise birthday present to a colleague's house. I have asked the people management area to give me the address and they told me they can't do that because it would be "violating the colleague's right to privacy". As I think this is excessive, should I report it?

Answer:

You should not report it. The answer you received is the correct one because we have to comply with the employee's right to protection and privacy of personal data, and its disclosure for purposes other than those that motivated its initial collection is not allowed.

Examples

Question:



I was invited to teach at a University, and I think it would be interesting if my students could analyse EDP's marketing campaigns. Can I discuss campaign strategies in class?

Answer:

Campaigns are commercial products and assets of the Company which, moreover, may involve copyright. As such, they may not be used for other purposes without prior authorisation.

Question:



I just found out today, overhearing a conversation between two directors, that the chances of a major project I'm working on being cancelled are high. No one has told me anything yet, but as my contract is up soon, I don't think it will be renewed. Can I post on my LinkedIn page saying that I might be available soon to take up a new professional challenge, because the project I am working on might be cancelled?

Answer:

As an employee, you have a duty of loyalty to EDP and must not disclose information about its organisation, production methods or business. So, although you may be concerned, you cannot talk about the possibility of cancellation of the project you are working on to anyone, not least because it is a confidential matter that has not yet been publicly disclosed.

Question:



I need to finish and send off for validation a report of a very important project I am involved in, however I am working in a public place and only have access to the data network that is available here. Should I connect to send the report as soon as possible?

Answer:

You should not connect to that network as it is an unprotected network and the information it carries could be accessed inappropriately. If there is no other alternative, you should favour mobile data over public networks.

Question:



I realized today that my domestic worker was very attentive to my weekly team meeting, which we conduct remotely. I don't know if he have overheard anything inappropriate on other occasions, particularly confidential information that I regularly discuss as part of my job. What should I do?

Answer:

Some sensitive information may have been unintentionally shared with third parties. You should have a serious conversation with your domestic worker, ascertain any information that may have been shared, and ensure that your remote workspace has the necessary conditions to guarantee the confidentiality required for your duties. Considering the hybrid work model at EDP, it is also your duty to pay special attention to all individuals who may coexist in your remote workspace, ensuring that privileged, confidential, and/or sensitive information remains secure.

Examples

Question:



Can I take home a piece of Company equipment that nobody uses anymore and that I could use?

Answer:

No. Even if the item is at the end of its useful life, it should not be made available to anyone without proper authorisation. Even if the item is at the end of its useful life, it should not be made available to anyone without proper authorisation. All goods belong to the Company's assets, regardless of their current use.

Question:



I inadvertently destroyed a set of documents and afraid of what might happen to me, I chose not to tell anyone. Now, my line manager is asking me about these documents, saying that they were sent to EDP, but that there is no record of their receipt. What should I do?

Answer:

You will have to report that you unintentionally destroyed them and face the consequences. Not having reported the destruction of the documents at the time is serious, but not owning up to your mistakes, making it impossible to repair them and mitigate the consequences, is inadmissible.

Glossary

Definitions of Stakeholders

EDP, EDP Group or Company:

Set of companies that are in a controlling relationship with EDP Energias S.A., regardless of whether their head offices are in Portugal or elsewhere.

Stakeholders: People, entities or groups that may affect or be affected by EDP's activities, products or services and the performance associated with them, including, but not limited to, employees, shareholders, customers, suppliers, counterparties, business partners, competitors, public and regulatory authorities, patrons, and local communities.

Shareholders: Natural or legal persons that hold shares in EDP S.A. or EDP Renováveis, S.A.

Customers: Natural or legal persons to whom EDP provides services or sells products, both through a regulated regime and in liberalised markets.

Employee: The natural person hired by any of the EDP Group companies, on a permanent or temporary basis, under an employment contract or professional internship contract.

Communities: Civil society organisations, institutions and entities representing citizenship, customers, business segments, media, research institutes, promotion and social development organisations.

Competition: It regulates all economic activity developed in the market economy, concerning the interplay of forces established between the supply and demand of goods or services, and regulates the behavior of economic agents, prohibiting the adoption of practices that have the purpose or effect of preventing, distorting, or restricting competition in the market.

Suppliers: Individuals or entities that supply products or provide services to EDP. This includes service providers. Including service providers.

Other Definitions

Environment: Natural environment in which an organisation operates, including the air, water, soil, natural resources, flora, fauna, people, external space and their interrelationshipsⁱ.

Supply Chain: Sequence of activities or partners which contribute with products or services to the organisationⁱⁱ.

Whistleblower: A natural person who denounces or publicly discloses an infringement on the basis of information obtained in the course of their professional activity, regardless of the nature of that activity and the sector in which it is carried out. The following may be deemed to be whistleblowers: a) Employees in the private, social or public sector; b) Service providers, contractors, subcontractors and suppliers, as well as any persons acting under their supervision and direction; c) Shareholders and persons belonging to administrative or management bodies or supervisory bodies of legal persons, including non-executive members; d) Volunteers and interns, paid or unpaidⁱⁱⁱ.

Sustainable Development:

Development that meets the needs of the present without compromising the possibility for future generations to meet their own needs^v.

Business Ecosystems: Network of organisations – including suppliers, distributors, customers, competitors, government agencies, etc. – involved in the delivery of a specific product or service through competition and cooperation. Each entity present in the ecosystem affects and is affected by the others, creating a constantly evolving relationship, in which flexibility and adaptability are determining characteristics.

“Extended” company: A company that carries out its activity relying not only on the provision of work and the knowledge of its employees, but also on the active collaboration of suppliers and partners in general and who are required, in turn, to undertake various commitments which include respect for the Code of Ethics, the Supplier Code of Conduct and other Policies and Codes of Conduct of the various business units of the parent company.

Entrepreneurship: Activity that involves the discovery, evaluation, and exploitation of opportunities to introduce new goods and services, ways of organising, markets, processes and raw materials through organising efforts that previously had not existed^v.

Equity: The notion of having fair treatment and equal access to opportunities within an organisation or system, and the effort to identify and eliminate inequalities and barriers^{vi}.

Rule of law: Legal and political systems, structures and practices, which condition a government’s actions to protect the rights and freedoms of citizens, maintain law and order, and encourage the efficient functioning of a country^{vii}.

Confidential and sensitive information: Information and documentation not available to the public regarding the entire activity of the Company, particularly regarding the businesses, research and development, customers, related parties and employees.

Integrity: Behaviour and actions consistent with a set of moral and ethical principles and standards of conduct, adopted both by individuals and by institutions, which create a barrier against corruption^{viii}.

Assets: Multiple and diversified resources, tangible or intangible, of companies or third parties one is entrusted with, examples of which are: Company money; Company products; computer systems and software; phones; photocopiers; Company vehicles; working hours of employees and their respective work products; tickets to performances or sporting events; patented information; registered trademarks of the Company.

Precautionary Principle: Moral and political principle that determines that if an action can cause irreversible public or environmental damage, in the absence of an irrefutable scientific consensus, the burden of proof lies on the side of those who intend to perform the act or action that may cause the damage. Its application in the area of the environment is mainly concerned with preventing possible harmful and irrecoverable effects, caused by actions that, although may not be scientifically and empirically proven to cause such damage, as a precaution, if there is no evidence of negative impacts, the action should not take place.

Retaliation: Application of reprisal or revenge; act or omission, including threats or attempts, that, directly or indirectly, occurring in a professional context, causes or may cause, unjustifiably, material or non-material damage.

Transparency: Openness to decisions and activities which affect society, the economy and the environment and willingness to ensure one's communication in a clear, accurate, timely, honest and complete manner^{ix}.

- ⁱ NP ISO 26000 Guidelines on Social Responsibility
- ⁱⁱ NP ISO 26000 Guidelines on Social Responsibility
- ⁱⁱⁱ Lei n. 93/2021 establishing the general regime for the protection of whistleblowers | Law No. 93/2021 | DRE
- ^{iv} Report of the World Commission on Environment and Development: Our Common Future, United Nations
- ^v Report of the World Commission on Environment and Development: Our Common Future, United Nations
- ^{vi} Política de DEIP | Diversidade, Equidade, Inclusão e sentido de Pertença no Grupo EDP, 2022
- ^{vii} NP ISO 26000 Guidelines on Social Responsibility
- ^{viii} NP ISO 26000 Guidelines on Social Responsibility
- ^{ix} NP ISO 26000 Guidelines on Social Responsibility

Code of Ethics

Our Energy

