

**Renewable Energy & Human Rights Benchmark 2023
Company Profile**

Company name Energias de Portugal (EDP)
Sub-sector Project developer
Overall score 32.0% weighted average

Section score	Weighting	For section
48.5%	20%	1. UNGP core indicators
19.7%	40%	2. Salient human rights risks
0.0%	20%	3. Serious allegations
71.9%	20%	4. ACT assessment as conducted by the World Benchmarking Alliance*

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found here: business-humanrights.org

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

Detailed assessment

1. UNGP core indicators based on the 2022 CHRB methodology (20% of total)

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company states that it is 'committed to respecting and enforcing all internationally recognized human and labor rights'. [Human Rights Policy, 07/2021: edp.com] Met: Universal Declaration of Human rights (UDHR): The Company states that 'it conducts its activity according to the United Nations instruments, in particular the Universal Declaration of Human Rights'. [Code of Ethics, 10/2022: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commitment to UNGPs: The Company states that human rights policy implementation is ensured through 'the adoption of operational procedures that include applying human and labor rights criteria when establishing investment partnerships, implementing a Due Diligence system ensuring the United Nations Guiding Principles on Business and Human Rights, as well as the OECD Guidelines for Multinational Enterprises'. [Human Rights Policy, 07/2021: edp.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The Company states that its human rights commitment includes 'applying the ILO Declaration on Fundamental Principles and Rights at Work and related conventions and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy'. [Human Rights Policy, 07/2021: edp.com]

* For information on the ACT methodology and scoring criteria please refer to the [World Benchmarking Alliance](https://worldbenchmarkingalliance.org).

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			<ul style="list-style-type: none"> • Met: Explicitly lists all four ILO core principles: The Company reports that 'within the scope of the International Labour Organisation instruments, EDP implements the Tripartite Declaration of Principles on Multinational Enterprises and Social Policy, including the Eight Fundamental Principles and Rights at Work, which aim to guarantee Trade Union Freedom and Collective Bargaining, the elimination of Forced or Compulsory Labour, the effective abolition of Child Labour, the elimination of discrimination in Employment and Occupation, respect for the rules on Working Time, the protection of Health and Safety at Work, the guarantee of payment of a minimum wage and the special rights of indigenous peoples'. [Code of Ethics, 10/2022: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to ILO core principles: See below, the supplier code includes requirements in each ILO core area. • Met: Explicitly lists all four ILO core principles for suppliers: The Company states in its Supplier Code of Conduct that labour commitments include 'a) Respect freedom of association and the collective bargaining of their workers, establishing mechanisms of dialogue free from any reprisals or discrimination. b) Ensure and promote the respect for free labor, based on fair and transparent contracts for workers, refusing to use and be complicit with forced labor, unjustified restrictions on free movement, misappropriation of documents and remuneration and human trafficking. c) Respect diversity, promoting equality and non-discrimination [...]. f) Prevent any form of child labor, under national regulations and ILO 138 of the International Labor Organization.' [Supplier Code of Conduct, 12/05/2017: edp.com]
A.1.4	Commitment to remedy	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to remedy adverse HRs impacts: The Company states that its action principles for human and labour rights include 'avoid adverse impacts that may arise from business operations or relationships, ensuring remediation in the event of their occurrence and undertaking not to retaliate against accusations, and cooperating in initiatives that promote access to remediation through legitimate judicial or non-judicial mechanisms'. [Human Rights Policy, 07/2021: edp.com] • Met: Expects suppliers to make this commitment: The Human Rights policy states that 'The EDP Group implements its strategic commitments to respect all internationally recognized human and labour rights, identified in article 6, through the application of the following action principles: e) avoid adverse impacts that may arise from business operations or relationships, ensuring remediation in the event of their occurrence and undertaking not to retaliate against accusations, and cooperating in initiatives that promote access to remediation through legitimate judicial or non-judicial mechanisms; h) Extend the same commitments to its business partnerships and suppliers, working towards to extend these same commitments to their supply chains and their partnerships.' [Human Rights Policy, 07/2021: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment to collaborate with judicial or non-judicial mechanisms: As indicated above, the action principles in the human rights policy include 'cooperating in initiatives that promote access to remediation through legitimate judicial or non-judicial mechanisms'. [Human Rights Policy, 07/2021: edp.com] • Not Met: Commitment to work with suppliers on remedy: The Human Rights policy states that 'The EDP Group implements its strategic commitments to respect all internationally recognized human and labour rights, identified in article 6, through the application of the following action principles: i. Work with its partners and suppliers to mitigate adverse impacts that are directly linked to its operations, products, or services through its own mechanisms or through cooperation in the development of third-party non-judicial solutions'. However, this subindicator looks for a commitment to cooperate in remediation, while current evidence seems to refer to mitigation. [Human Rights Policy, 07/2021: edp.com]
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company states that 'To ensure effective management of respect for Human and Labor Rights established in this Policy, the EDP Group: a. Establishes the Human Rights Working Committee, chaired by a director of the EBD, managed by the corporate director responsible for Human and Labor Rights, and made up of the corporate directors with assigned responsibilities in the area of this policy, that is, ethics, sustainability, compliance, legal, auditing, management and labour relations, procurement and supplier management, prevention and safety, risk, and stakeholder management.' However, the EBD refers to Executive Board of Directors, composed of CEO/CEP from

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>different EDP business. It is not considered as a Supervisory board level responsibility. Evidence is in use for other indicators. [Human Rights Policy, 07/2021: edp.com]</p> <ul style="list-style-type: none"> • Not Met: Describes HRs expertise of Board member: The Company has provided comments that 'To ensure effective management of respect for Human and Labor Rights established in this Policy, the EDP Group: a. Establishes the Human Rights Working Committee, chaired by a director of the EBD, managed by the corporate director responsible for Human and Labor Rights, and made up of the corporate directors with assigned responsibilities in the area of this policy, that is, ethics, sustainability, compliance, legal, auditing, management and labour relations, procurement and supplier management, prevention and safety, risk, and stakeholder management'. However, no explicit evidence found that the Company has a board level responsibility with human rights expertise to oversee human rights issues. Current evidence refers to executive level. [Human Rights Policy, 07/2021: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement. [Human Rights Policy, 07/2021: edp.com]

B Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Met: Senior responsibility for HRs implementation and decision making: The Human Rights working committee described below is 'chaired by a director of the EBD [Executive Board of Directors]', managed by the corporate director responsible for Human and Labour Rights and made up of the corporate directors with assigned responsibilities in the area of this policy, that is, ethics, sustainability, compliance, legal, auditing, management and labor relations, procurement and supplier management, prevention and safety, risk and stakeholder management'. [Human Rights Policy, 07/2021: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments: The duties of the Human Rights Working Committee are: 'a) Assess the Annual Report and the Improvement Plan, prepared by the Human and Labor Rights corporate director, submitting it to the EBD. b) Analyze impact assessment and due diligence procedures. c) Consider and contribute to the salient Human and Labor Rights Risk Map. d) Advice on the development of performance indicators and provide an opinion on external assessments related to Human and Labor Rights. e) Analyze negative occurrences relating to Human and Labor Rights and the measures taken. f) Consider matters submitted to it by the corporate director of Human and Labor Rights'. However, the committee is made up of corporate directors, so it is not clear how day-to-day responsibility for implementing commitments is allocated. The Company has provided further comments regarding this indicator, however, no evidence found in relation to this requirement. [Human Rights Policy, 07/2021: edp.com] • Not Met: Day-to-day resources and expertise allocation in own operations: The Company has provided further comments regarding this indicator, however, no evidence found in relation to this requirement. • Not Met: Resources and expertise allocation in supply chain
B.2.1	Identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: The Company states in its Human Rights Policy that its action principles include 'identify, prevent and monitor the risks related to human and labour rights that are salient in its sector of activity, developing and keeping a Human and Labor Rights Risk Map up to date.' The Company also states in its Integrated Report that 'the analysis of the risks related to the respect for human and labour rights is carried out by assessing the country risk, the local risk and the specific risk of each activity according to the nature of the project, informed by the sector's risk map.' The Company has listed up four main risks for negative impact on human rights including failure to follow ILO Conventions, accidents at work, unemployment, and negative impact on the land. However, no evidence found on the details of the process to identify potential human rights risks and impacts in its operations. The Company has provided comments regarding this indicator, however, no evidence found in

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			<p>relation to this requirement. [Human Rights Policy, 07/2021: edp.com] & [Integrated Annual Report 2022, 31/12/2023: edp.com]</p> <ul style="list-style-type: none"> • Met: Describes process for identifying risks in business relationships: The Company has provided comments that the Company conducts double due diligence for its supply chain. The 1st step is to due diligence to the activities, which is implemented before scouting suppliers to identify country, sector, industry and specific service or good risks. The 2nd step is to due diligence to each supplier. Scouted suppliers must pass the first due diligence layer and are directly assessed through questionnaires, sharing of evidence, and for salient risks, direct verification. The Company has the in-depth due diligence process, which applies to suppliers that are exposed to clearly identified risks. The system applied by EDP consists of 3 main filters, which guide the definition of mitigation measures and control procedures. The Company has also listed six layers of due diligence. For example, the mandatory DD2 advanced ESG assessment requires that supplier is assessment against an advanced questionnaire, specific to the risk of the procured activity. Evidence, face to face, and on-site verification is carried out. [Human and Labour Rights Report 2022, 07/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement. • Met: Describes how risk identification system is triggered by new circumstances: The Company has provided comments that 'Policy implementation in field activities is ensured through the adoption of operational procedures that include, in particular, b) Carrying out and publishing human rights impact assessments (HRIA) or environmental and social impact assessments (ESIA) covering human and labour rights, prepared by independent third parties, whenever substantial infrastructure projects or closures are undertaken, or when entering new businesses or geographies.' [Human Rights Policy, 07/2021: edp.com] • Met: Describes risks identified in relation to new circumstances: The Company reports that 'in the field of new investments and infrastructures, the main risks are related to guaranteeing the rights of local communities, namely property rights, which are typically rights of use that are not embodied in full ownership, such as the situation of indigenous territories, fishing or hunting areas, protected landscapes, and land use rights. In these cases, the construction right authorised by the public authorities can be substantially challenged by the communities'. [Integrated Annual Report 2022, 31/12/2023: edp.com]
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes assessment process and discloses salient HRs risks: The Company states that human rights policy implementation includes 'carrying out and publishing human rights impact assessments (HRIA) or environmental and social impact assessments (ESIA) covering human and labor rights, prepared by independent third parties, whenever substantial infrastructure projects or closures are undertaken, or when entering new businesses or geographies'. The Integrated report indicates that 'the analysis of the risks related to the respect for human and labour rights is carried out by assessing the country risk, the local risk and the specific risk of each activity according to the nature of the project, informed by the sector's risk map'. The Company also reports that it achieved KPIs 100% in 2022 that 'it carries out human rights impact assessments on the development of infrastructure projects, following the Ruggie methodology'. [Human Rights Policy, 07/2021: edp.com] & [Integrated Annual Report 2022, 31/12/2023: edp.com] • Met: Describes how process applies to supply chain: See B.2.1. The Company has provided comments that the Company conducts double due diligence for its supply chain. The 1st step is to due diligence to the activities, which is implemented before scouting suppliers to identify country, sector, industry and specific service or good risks. The 2nd step is to due diligence to each supplier. Scouted suppliers must pass the first due diligence layer and are directly assessed through questionnaires, sharing of evidence, and for salient risks, direct verification. The Company has the in-depth due diligence process, which applies to suppliers that are exposed to clearly identified risks. The system applied by EDP consists of 3 main filters, which guide the definition of mitigation measures and control procedures. The Company has also listed six layers of due diligence. For example, the mandatory DD2 advanced ESG assessment requires that supplier is assessment against an advanced questionnaire, specific to the risk of the procured activity. Evidence, face to face, and on-site verification is carried out. [Human and Labour Rights Report 2022, 07/2023: edp.com]

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			<ul style="list-style-type: none"> • Met: Public disclosure of results of HRs risk assessment: The Company has listed up four main risks for negative impact on human rights including failure to follow ILO Conventions, accidents at work, unemployment, and negative impact on the land. The Company reports that 'in the field of new investments and infrastructures, the main risks are related to guaranteeing the rights of local communities, namely property rights, which are typically rights of use that are not embodied in full ownership, such as the situation of indigenous territories, fishing or hunting areas, protected landscapes, and land use rights. In these cases, the construction right authorised by the public authorities can be substantially challenged by the communities'. [Integrated Annual Report 2022, 31/12/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders: The Company has provided comments that the construction of renewable farms and power infrastructures always have physical impact on territories and local populations. The Company reports that some of its projects in Colombia are in Indigenous Reservations areas. The Company has local team to conduct prior consultation with Wayuu communities. Prior consultation is a mandatory process that must be carried out before the execution of a project that may affect their living conditions through a two-way dialogue with the communities. However, no evidence found on how it involves affected stakeholders in general human right assessment processes, rather than an example for some projects in specific settings. [Human and Labour Rights Report 2022, 07/2023: edp.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company states in its Human Rights Policy that its action principles include 'avoid adverse impacts that may arise from business operations or relationships, ensuring remediation in the event of their occurrence and undertaking not to retaliate against accusations, and cooperating in initiatives that promote access to remediation through legitimate judicial or non-judicial mechanisms.' However, no further evidence found on the details of system to prevent, mitigate and remediate its salient human rights issues. The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement. [Human Rights Policy, 07/2021: edp.com] • Not Met: Describes how global system applies to supply chain: The Company has provided comments that 'The EDP Group implements its strategic commitments to respect all internationally recognized human and labor rights, identified in article 6, through the application of the following action principles: a) Identify, prevent, and monitor the risks related to human and labor rights that are salient in its sector of activity, developing and keeping a Human and Labor Rights Risk Map up to date. i) Work with its partners and suppliers to mitigate adverse impacts that are directly linked to its operations, products, or services through its own mechanisms or through cooperation in the development of third-party non-judicial solutions.' However, no further evidence found on the description of the system to proactively prevents, mitigate, and remediate salient human rights issues in supply chain. [Sustainable Supply Chain Report 2022, 06/2023: edp.com] • Met: Example of actions decided on at least 1 salient HRs issue: The Company lists its action programmes directed at the most salient risks. For the risk failure to follow ILO Conventions, the Company has action programme such as extension of Due Diligence to Indirect Suppliers, the use of Solar Stewardship Initiative, and Bettercoal. For the risk accidents at work, the Company has Global PlayitSafe Programme. For unemployment, the Company has Just Transition Local Reinvestment Plans and for negative impact on the land, the Company has Local Community Development Programme. [Integrated Annual Report 2022, 31/12/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement.
B.2.4	Tracking the effectiveness of actions to respond to human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions: The Company indicates that 'On top of the due diligence measures in all its Business Units – including new projects and acquisitions, suppliers, contractors, joint ventures, agents, customers and employees – annually, the Group develops a transversal

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	risks and impacts		<p>monitoring process aimed at verifying effective practices, assessing the degree of compliance with the principles and commitments assumed, particularly of the risks identified as most relevant, identifying new potential risks, developing the necessary corrective actions and taking new management decisions to change any procedures in need. This procedures assessment or monitoring process takes evidence from the ensemble of due diligences processes.’ However, no details found on how it does so (evaluate whether actions taken to face specific salient issues are being effective). [Human and Labour Rights Report 2022, 07/2023: edp.com]</p> <ul style="list-style-type: none"> • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement.
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The Company reports examples of engaging with local stakeholders in Unites States. The Community is worried about viewshed impacts when the Company implements Rolling Uplands Wind Farm. The Company ‘works its way through ongoing dialogue with project stakeholders, local authorities and attendance at public meetings. The same mistrust of the newcomers led Village of Misenheimer officials (where the Misenheimer Solar Park is being built) to delay issuing a permit on clearing trees, while waiting to become familiar with the project, and ensure EDP was abiding by environmental agency requirements. Throughout, the dialogue with the Village is ongoing, with public events hosted in the community.’ However, this sub indicator looks for examples of concerns related to human rights issues raised (human rights due diligence context). The Company has provided comments regarding this indicator, however, it is not related to stakeholder involvement on human rights issues. [Integrated Annual Report 2022, 31/12/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement.

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company states in its Human Rights Policy that its action principles include ensuring the proper functioning of a system to report occurrences and make complaints, with a guarantee of confidentiality and non-retaliation. The Company has the Ethics Channel, which is ‘accessible to all individuals, workers and citizens, and communities or organizations, that may be adversely impacted by the company or, irrespective of this, that wish to complain, denounce, clarify or expose any situation, i.e. those related to human and labour rights.’ The Company also has Whistleblowing Management Regulation Speak Up stating that ‘global and transversal channel and on the intranet at Speak Up, which can be used by stakeholders of any EDP Group company to report complaints about alleged violations of the EDP Code of Ethics, including topics such as: a) specific compliance obligations such as those laid down in Law 93 and Law 83; b) financial matters; c) situations that may constitute moral and/or sexual harassment.’ [Human Rights Policy, 07/2021: edp.com] & [Whistleblowing Management Regulation Speak Up, 02/05/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company has provided comments that the whistleblowing channels are available on the website in English, Portuguese, and Spanish. However, no evidence found how the Company ensures its workers are made aware of it through specific communications or training. [Speak Up (website), N/A: edp.com] & [Integrated Annual Report 2022, 31/12/2023: edp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes how workers in supply chain access grievance mechanism: The Company has provided comments that 'We rigorously implement a transparency policy, giving a voice to anyone who encounters conduct they believe breaches ethical principles, legislative provisions or internal standards. To enable this reporting, we provide various "Speak up" channels, which strictly follow the legal requirements regarding whistle-blowing and are easily accessible to anyone wishing to use them.' It is assumed that its suppliers can also access to its Speak Up channels. [Speak Up (website), N/A: edp.com] • Met: Expects suppliers to convey expectation to their suppliers: The Company has provided comments that 'The EDP Group implements its strategic commitments to respect all internationally recognized human and labor rights, identified in article 6, through the application of the following action principles: Extend the same commitments to its business partnerships and suppliers, working towards to extend these same commitments to their supply chains and their partnerships.' [Human Rights Policy, 07/2021: edp.com]
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company states that its Ethical Channel is accessible to all individuals, workers and citizens, and communities or organizations. [Human Rights Policy, 07/2021: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Company has provided comments that the whistleblowing channels are available on the website in English, Portuguese, and Spanish. However, no evidence found how the Company ensures its affected stakeholders are made aware of it through specific communications or training. [Speak Up (website), N/A: edp.com] • Not Met: Describes how external individuals/communities access grievance mechanism: The Company has provided comments that 'We rigorously implement a transparency policy, giving a voice to anyone who encounters conduct they believe breaches ethical principles, legislative provisions or internal standards. To enable this reporting, we provide various "Speak up" channels, which strictly follow the legal requirements regarding whistle-blowing and are easily accessible to anyone wishing to use them.' However, this subindicator looks for evidence that suppliers' external stakeholders and communities can file complaints in relation to suppliers' behaviour. [Speak Up (website), N/A: edp.com] • Not Met: Expects supplier to convey expectation to their suppliers: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement.
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement. • Not Met: Describes how remedy would be provided if no adverse impact identified: The Company states that 'the procedures established ensured that, throughout 2022, as in previous years, the EDP group was not subject to accusations or suspicions of violations of fundamental human and labour rights. However, occasional occurrences were registered and dealt with, being neither structural nor recurrent and often related to individual behaviours or situations leading to complaints that were solved within the ethical process and, when justified, gave rise to corrective measures, penalties or reinforcement of established procedures.' In its Whistleblowing Management Regulation, the Company states that if the complaint is confirmed to be well-founded, the investigation phase begins. The process includes contract with the whistleblower, urgent measures and immediate action, and then according to the complaint content, responsible department will carry out a preliminary analysis and make recommendations accordingly. It is not clear, however, how this includes a process to remedy/reparation for the complainant(s). The Company has provided comments regarding this indicator, however, core evidence was already in use. [Human Rights Policy, 07/2021: edp.com] & [Whistleblowing Management Regulation Speak Up, 02/05/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes approach to monitoring/implementing agreed remedy: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement. • Not Met: Describes approach to learning from incidents if no adverse impacts identified: The Company has provided comments that 'EDP has not caused or contributed to human rights impacts without previous FPIC process and agreement.' However, no evidence found that the Company describes its approach it would take to review and change systems, processes or practices to prevent adverse in the future.

CSI. Responsible lobbying and political engagement fundamentals

Indicator Code	Indicator name	Score (out of 2)	Explanation
CSI.18	Responsible lobbying and political engagement fundamentals	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The Interest Representation policy states that 'Covering important issues that affect EDP's activities and/or Stakeholders, Interests Representation comprises activities that are carried out with the aim of participating in the processes of forming public decisions, developing interactions with various institutions at national and international level, with a view to making known to the competent entities the legitimate interests of the Company and/or the sector, which EDP believes should be considered within the scope of the aforementioned processes of forming decisions. Interests Representation includes the following activities: a) Lobbying activity: Lobbying is a legal and regulated activity in some markets in which EDP is present, notably in the United States of America and with the European Union Institutions. As such, and considering only and exclusively these markets, this Policy considers as lobbying the activity developed by the In-house Lobbyists and Lobbyists, as defined above.' 'EDP undertakes to • Pursue its activity in strict compliance with the laws and regulations in force, together with the promotion of responsible action guided by the strictest standards of Transparency, Ethics and Integrity. EDP guarantees compliance with national and international legislation applicable to each entity in the EDP Group, as well as with this Policy and other internal regulations in force, and any acts and/or omissions that constitute a breach or infringement of such rules are not tolerated. Therefore, EDP promotes a conduct that complies with the legislation in force, that is honest, upright, professional and fair conduct, and requires that the companies that constitute the Group, their employees and third parties acting on their behalf guide their behaviour in accordance with this commitment.' 'The Lobbyist shall be duly registered and communicate to EDP of any change in its registration. Whenever acting on behalf of EDP or of a company to which this Policy applies, the Lobbyist shall inform the company concerned and guide its conduct in accordance with the principles set out in this Policy, as well as the other internal regulations in force, and always in compliance with the applicable legal framework. A Lobbyist may only conduct this activity if and when it is regulated by the jurisdiction in which it operates, namely with European Union Institutions and in the United States of America.' [Interest Representation Policy, 04/07/2023: Interest Representation Policy.pdf (edp.com)] • Met: Publicly available policy statement that specifies the Company does not make political contributions: The Company states in its Integrity Policy that 'the making of contributions or the association of EDP's brand to political parties to political parties, candidates, campaigns, political candidacy structures or related persons or entities, namely through the delivery of assets or provision of services, directly or indirectly, in the name or in representation of EDP, may affect the integrity of the EDP Group entities and is, therefore, prohibited.' [EDP Group Integrity Policy, 23/05/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Met: Disclosure of expenditures on lobbying activities: The Company reports that 'for the year 2021, the lobbying costs were around 5 million euros and related particularly to the decarbonisation of the economy, electric mobility, energy efficiency and security of supply.' 'For the year 2022, the costs of representation of interests were around 6 million euros and related particularly to the decarbonisation of the economy, electric mobility, energy efficiency and security of supply'. [Integrated Annual Report 2022, 31/12/2023: edp.com] & [Sustainability Report 2021, 31/12/2023: edp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies): The Company has provided comments from Interest Representation Policy that 'EDP promotes a conduct that complies with the legislation in force, that is honest, upright, professional and fair conduct, and requires that the companies that constitute the Group, their employees and third parties acting on their behalf guide their behaviour in accordance with this commitment.' [Interest Representation Policy, 04/07/2023: Interest Representation Policy.pdf (edp.com)]

2. Salient human rights risks (40% of total)

D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.PD	Commitment to respect indigenous peoples' rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration: The Company states that 'we must acknowledge the rights of ethnic minorities and indigenous peoples where appropriate'. Commitment must include own operations and value chain. The Company has provided comments from its Human Rights Policy that 'The Policy sets out for the EDP Group's sphere of activity its commitment to respect all internationally recognized human and labor rights, namely: Understanding the Indigenous and Tribal Peoples Convention, 1989 (No. 169)'. However, no evidence found the Company has a public commitment to respect indigenous peoples' rights explicitly referencing the UN Declaration on the Rights of Indigenous Peoples. [Code of Ethics, 10/2022: edp.com] & [Human Rights Policy, 07/2021: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Description of process for identifying indigenous persons and customary lands. <p>Commitment to FPIC (in line with ILO No.169): The Company has provided comments from its Human Rights Policy that 'The Policy sets out for the EDP Group's sphere of activity its commitment to respect all internationally recognized human and labor rights, namely: Understanding the Indigenous and Tribal Peoples Convention, 1989 (No. 169)'. The Company has 2023-2036 goals that the principles of free, prior, and informed consent and shared value are applied in all new projects impacting communities. However, no evidence found on the description of process for identifying indigenous persons and customary lands. Also, FPIC seems to be a goal rather than a commitment. [Human Rights Policy, 07/2021: edp.com] & [Human and Labour Rights Report 2022, 07/2023: edp.com]</p> <ul style="list-style-type: none"> • Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The Company has provided comments that 'EDPR secured two 20-year contracts for the construction of two wind farms. The contracts refer to the Alpha (212 MW) and Beta (280 MW) onshore wind projects, which are currently being developed. Some projects, including EDPR's, are in Indigenous Reservations areas. EDPR is especially active in the region of La Guajira in which the Wayuu (an Indigenous American ethnic group) are present, and where we have a social local team of 7 people with previous specific experience in relations and prior consultation with Wayuu communities, complemented by a team of 20 contractors of which 18 are Wayuus, ensuring we have a close connection and understanding of the reality.' As stated, prior consultation is a fundamental right that ethnic groups in Colombia have in order to be able to decide on measures (legislative and administrative) or projects, works or activities that are going to be carried out within their territories, with the aim of protecting their cultural, social, and economic integrity, and guarantee the right to participation. It is a mandatory process that must be carried out before the execution of a project that may affect their living conditions through a two-way dialogue with the communities. Some commitments emerge from the prior consultation with the purpose of preventing, mitigating, correcting, or compensating the impacts generated by the project in the territories, which are determined through impact identification workshops.' The prior consultation is ongoing and the project is not completed yet. [Human and Labour Rights Report 2022, 07/2023: edp.com]
D.2.PD	Engagement with all affected communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how local communities identified and engaged in the last two years: The Company reports that it has dialogue with project stakeholders, local authorities, and attendance at public meetings during its project in the United States. However, no evidence found on the details of how it identifies and engages with affected stakeholders on a regular basis, including human rights issues. The

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Company has provided comments regarding this indicator, however, core evidence was already in use for indicators below. [Human and Labour Rights Report 2022, 07/2023: edp.com]</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of engagement with communities: The Company has provided comments that in its projects in Colombia, the Company is active in the region of La Guajira in which the Wayuu (an Indigenous American ethnic group) are present. The Company has a social local team of 7 people with previous specific experience in relations and prior consultation with Wayuu communities, complemented by a team of 20 contractors of which 18 are Wayuus, ensuring we have a close connection and understanding of the reality. The Company conducts prior consultation before the execution of a project that may affect their living conditions through a two-way dialogue with the communities. In its wind farm projects in Brazil, on 05/27/2022 EDPR successfully won the bid for two Power Purchase Agreements of 15 years in the Brazilian renewable energy auction (A-4 2022) to sell clean energy produced by 93 MW in a wind farm with 124 MW of total installed capacity. These wind farms are in the municipality of Pocinhos, in the state of Paraíba, and are scheduled to start construction in December 2023. The municipality of Pocinhos forms part of the region of Pólo da Serra da Borborema, comprising 15 municipalities in this mountainous region of the interior of the Northeast area of Brazil. Three municipalities of the Paraíba state fall within the Wind Power Generation and Transmission Lines of the Serra da Borborema Project. As a result of this diagnosis, the departments of Environment, Social and Public Affairs & Community Relations drew up an action plan to be executed throughout 2023, which included initiatives addressing education and improvement of school environment, cultural events throughout the year, sports events, etc. However, no information found on the details of engagement with communities in the Brazilian case. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Examples of engagement refer to marginalised groups and provide additional detail: The Company has provided comments regarding this indicator, however, core evidence was already in use for indicator above. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues: The Company has provided comments regarding this indicator, however, core evidence was already in use for indicator above. • Not Met: Describes how stakeholders views influenced company's HRs approach: The Company has provided comments regarding this indicator, however, core evidence was already in use for indicator above.
D.3.PD	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to identify benefit and ownership sharing • Not Met: Commitment includes right to decide own priorities for communities <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing • Not Met: Disclosure how affected communities participated in decision-making
D.4.PD	Local wind & solar energy access, affordability	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Actions taken to support access and affordability of renewable energy in the value chain: The Company has provided comments that in its wind farms in Colombia, 'the projects are expected to have several other benefits for the local communities, such as local job creation (currently, 60% of the labour force is from the Department of La Guajira), and access to renewable electricity supply through "solar communities" in some areas. resulting from the agreements made with the communities and in our efforts to support their development, we committed to a budget of 66 billion COP (~15 million USD) for 30 years with the objective of increasing the quality of life of local communities and contribute to their continued socio-economic development.' However, no evidence found of actions carried out including not only its operations but value chain. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Including a timebound actions plan and reporting targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Public support for government policies addressing energy access: The Company has provided comments that 'we are committed to promoting Access to Energy (A2E) in developing countries, focusing on regions with no connection to the electricity grid, and helping communities to break their poverty cycle.' So far, the Company has launched 4 edition projects of the A2E Fund to support renewable energy projects that promote the environmental, social, and economic development of rural communities in developing countries. The Company also

Indicator Code	Indicator name	Score (out of 2)	Explanation
			carried out a study on energy poverty together with ISEG. However, no evidence found on a public support for government policies and actions to address energy access challenges (or whether these actions are firstly promoted by governments).

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.PD	Respect for land and natural resource tenure rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect land ownership/natural resources as in VGGT. Discloses how identifies legitimate tenure holders.: The Human rights policy states that 'Policy implementation in field activities is ensured through the adoption of operational procedures that include, in particular: b) Carrying out and publishing human rights impact assessments (HRIA) or environmental and social impact assessments (ESIA) covering human and labour rights, prepared by independent third parties, whenever substantial infrastructure projects or closures are undertaken, or when entering new businesses or geographies'. However, core evidence is already in use and not related with the indicator here. No evidence found of a commitment to respect land and natural resources ownership as set out in the VGGT and discloses the process by which it identifies legitimate tenure holders. [Human Rights Policy, 07/2021: edp.com] • Not Met: Disclosure of locations of projects including numbers in urban, rural, natural areas: The Company has provided comments that its power generation (hydroelectric, thermoelectric, wind and solar) and electricity transmission and distribution activities have the greatest impact on biodiversity. The Company has listed its projects in Portugal and Spain, which have impact on bird protection, ecological flows, and natural capital. The Company also commented the location of its subsidiary companies. However, no evidence found on the quantitative data of projects including numbers in urban, rural, and natural areas. [Integrated Annual Report 2022, 31/12/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Extends expectation to business relationships • Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose
E.2.PD	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to follow IFC PS 5 for physical and economic displacements • Not Met: Commitment not to relocate without FPIC and to providing compensation <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Publishes statistics on numbers affected by relocations (current and planned projects) • Not Met: Publishes regular reviews of living conditions after relocation • Not Met: Description of approach to physical and economic displacement

F. Security and conflict-affected areas (incl. responsible mineral sourcing)

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas: The Company has provided comments that 'EDP doesn't source from conflict-affected and/or high-risk areas, but request from suppliers'. Regarding operational procedures, the Company states in its Human Right Policy that 'The obligation to apply conflict minerals regulations and ensure import minerals and metals come from responsible sources.' However, no evidence found explicit commitment to address the heightened human rights risks associated with operations in conflict-affected and/or high-risk areas, in line with the recommendations of the UN Working Group on business and human rights. [Human Rights Policy, 07/2021: edp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens: The Company has provided comments that it has due diligence process for its suppliers and is extending due diligence to indirect suppliers. In this area, the photovoltaic panels sector is a priority, insofar as it is a strategic technology in EDP's business plan and is exposed to geopolitical conflict, is affected by accusations of forced labour, customs controls, price rises and logistical disruptions, generating significant medium/long term uncertainty. However, no evidence found on the steps the Company takes to assess and mitigate these risks with a conflict-sensitive lens (applying conflict-sensitive lens to any operation or sourcing that may be affected by high risks of conflicts). [Sustainable Supply Chain Report 2022, 06/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How stakeholders are involved in the process to mitigate risks: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement.
F.2.PD	Evidence of security provider human rights assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Regularly conducts risk assessment regarding security forces: The Company has provided comments that 'EDP doesn't employ security forces and EDP does not hire the services of security forces either' (although this statement has not been found in public sources). However, the Human Rights Policy states that 'Policy implementation in field activities is ensured through the adoption of operational procedures that include, in particular: Applying requirements for assessment, contracting, training, auditing, and exclusion of suppliers regarding human and labor rights practices. Specially for supply chains that are internationally recognized as being at risk, suppliers shall be bound to the following obligations: - obligation to certify contractors that provides infrastructure security'. However, it is not clear how it assesses eventual contractors that provide infrastructure security either. [Human Rights Policy, 07/2021: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to Voluntary Principles on Security and HRs • Not Met: If applicable, discloses use of private security providers and uses only ICoCA members. <p>If direct employment of security, commitment to follow ICoCA itself.: The Company has provided comments regarding this indicator, however, core evidence was already in use for indicator above. Not clear that the Company requires contractors that provide infrastructure security to be ICoCA members.</p>
F.3.PD	Responsible sourcing of minerals: Arrangements with suppliers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Statement on OECD Guidance aligned due diligence: The Company has provided comments that 'The EDP Group is committed to respecting and enforcing all internationally recognized human and labor rights, identified in article 6. This commitment means: c) Operate a human and labor rights management system that is active and present in all its activities, implementing the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and the Directive of the European Parliament and of the Council on Corporate Due Diligence and Corporate Accountability.' [Human Rights Policy, 07/2021: edp.com] • Met: Requirement on OECD Guidance aligned due diligence in contracts/codes with suppliers: The Company has provided comments that 'Applying requirements for assessment, contracting, training, auditing, and exclusion of suppliers regarding human and labor rights practices. Specially for supply chains that are internationally recognized as being at risk, suppliers shall be bound to the following obligations: The application of a Human and Labor Rights Policy and a Due Diligence system implementing the United Nations Guiding Principles on Business and Human Rights, as well as the OECD Guidelines for Multinational Enterprises.' [Human Rights Policy, 07/2021: edp.com] <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on risk assessment and improving DD <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Disclosure of supply chain mapping: The Company has provided comments with its Human and Labour Risk Maps. The map indicates EDP country's ranks, country's ranks, based on the frequency and severity of incidents registered by RepRisk, that are related to the alternative energy sector, ordered from high risk to low risk. However, no evidence found on the information of names and address of its first-tier suppliers and below-first tier suppliers. [Human and Labour Rights Report 2022, 07/2023: edp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.4.PD	Responsible sourcing of minerals: Risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes risk identification and disclosure in line with OECD Guidance: The Company has provided comments on the risk map for core suppliers. The map lists risk scales for each business activity regarding potential issues. Potential issues include human rights issues, such as child labour, inhibition of collective bargaining/association rights, etc. However, no evidence found on the processes for identifying and prioritising risks and impacts in its supply chain as set out in the OECD Guidance. [Human and Labour Rights Report 2022, 07/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expectation of suppliers to disclose supply chain mapping • Not Met: Risk identification process covers all minerals
F.5.PD	Responsible sourcing of minerals: Risk management in the mineral supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Suppliers using minerals in equipment provided to describe steps taken to respond to risks in supply chain: The Company has provided comments on the engagement process with strategic suppliers in sustainability matters, including human and labour rights. during the qualification phase, the Company shares its ESG priorities with suppliers in order to assess their performance, analyse their contribution to the EDP Group's goals and identify potential risks. EDPR includes ESG clauses in the contracting phase. However, evidence is not related to the steps suppliers take to management and respond to risks identified in their mineral supply chain. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Those suppliers to describe monitoring of risk prevention/mitigation measures: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement. • Not Met: Those suppliers to disclose significant improvement over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How suppliers and affected stakeholders engaged on strategy • Not Met: Processes cover all minerals

G. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Commitment to respect the rights of human rights and environmental defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement. • Not Met: Expectation on business partners in value chain to make this commitment: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Description of how working with HRDs to create safe and enabling environment

H. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.PD	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Discloses quantitative H&S information (injury rates or lost days, and fatalities): The Company reports that accidents at work were 28, fatalities were 0, frequency rate were 1.13 per million hours worked for its employees, and total lost days due to accidents were 1,594 in 2022. [Integrated Annual Report 2022, 31/12/2023: edp.com] • Not Met: Expectation extends to relevant business relationships: The Company reports that accidents at work were 105, fatalities were 5, frequency rate were 2.18 per million hours worked for its contractors in 2022. However, no evidence found the Company has quantitative information requirements for supply chain, going beyond direct contractors. The Company has provided comments from its Safety Security & Business Continuity Report, which reports quantitative data for employees and service providers. The Company has commented that 'EDP reports quantitative information on injury rates and lost days for all relevant suppliers'. However, no evidence found of data beyond contractors, and formal requirement for suppliers to report such quantitative information. [Integrated Annual Report 2022, 31/12/2023: edp.com] & [Safety, Security & Business Continuity Report, 31/12/2022: edp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Sets targets for H&S performance (including injury rates or lost days and fatalities): The Company has target 2025 to achieve severity index (employees and contractors) less than 150 and fatal accidents (employees and contractors) 0. [Integrated Annual Report 2022, 31/12/2023: edp.com] • Not Met: Met targets or explains why not or how improve H&S management systems: The Company has provided comments that it has targets set for 2022 for each geography. For example, in Portugal, it has 20 objectives and 95% of it was achieved. However, no further evidence is available on the details of each health/safety objective and reporting against it. [Safety, Security & Business Continuity Report, 31/12/2022: edp.com]
H.2.PD	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: The Company states in its Supplier Code of Conduct that it 'ensures and promotes the respect for free labour, based on fair and transparent contracts for workers, refusing to use and be complicit with forced labour, unjustified restrictions on free movement, misappropriation of documents and remuneration and human trafficking.' However, no evidence found board level responsibility for overseeing forced labour in supply chain. Evidence must include how experiences of affected stakeholders inform board discussions. The Company has provided comments, however, core evidence is already in use for senior responsibility above. [Supplier Code of Conduct, 12/05/2017: edp.com] • Not Met: Suppliers to have these arrangements in place <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: The Company states that 'the photovoltaic panels sector is a priority, insofar as it is a strategic technology in EDP's business plan and is exposed to geopolitical conflict, is affected by accusations of forced labour, customs controls, price rises and logistical disruptions, generating significant medium/long term uncertainty.' The Company has an action plan for 2023 to extend the practice of due diligence to indirect suppliers. The Company has provided comments that 'Forced and child labour risks are analysed at top management level, management procedures and training are implemented. Direct suppliers and subcontractors are qualified by EDP and 3rd parties to assure that indirect suppliers are also compliant with the fundamental human rights. Suppliers are screened, assessed, audited before and during the contract. Contracts include human rights rules, transparency, and traceability clauses. Contracts include obligations and expectations for second tier suppliers. Once the contractual relationship has been established, the Company also monitors, audits, and evaluates the performance of its critical suppliers. EDP is currently discussing with its suppliers exposed to risks, modifying contractual clauses, requesting equivalent commitments and the principle of independent auditing. However, no evidence found of proactive work conducted to mitigate risk of forced labour in own operations and supply chain, for example through capability building, workshops, collaboration with others, etc. Current evidence seems to focus in formal requirements and compliance-monitoring. [Integrated Annual Report 2022, 31/12/2023: edp.com] • Not Met: Factors to be considered when ending a business relationship
H.3.PD	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts: The Company states in its Supplier Code of Conduct that it 'ensures adequate remuneration to workers, in accordance with current legislation and collective labour agreements, when applicable, which shall be paid on time, respecting the minimum wages established in each country, paying overtime and other compensation, social security contributions and taxes that are due.' However, no evidence found on explicit requirement of paying in full. [Supplier Code of Conduct, 12/05/2017: edp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes work with suppliers on paying workers regularly, in full and on time: The Company has provided comments that 'The Licensing/Qualification of the supplier will be dependent on: Absence of debts to the Social Security, the Tax Authority or to workers, namely overdue wages'. During the carrying out of the contract, the performance of suppliers must be assessed in accordance with the EDP Group's Assessment Model. The assessment model shall take into account various aspects, including ethics, human and labour rights. However, no evidence found that how the Company helps/influences its suppliers to pay workers in full and on time, rather than stopping licensing once overdue wages are detected. [Sustainable Supply Chain Report 2022, 06/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain: The Company has provided comments that as the result of 2022 Due Diligence to critical Suppliers Tier 1 and Tier 2, the number of non-compliant suppliers against international covenants is 0. However, no evidence found explicit assessment of numbers affected by failure to pay in full, and on time in its supply chain beyond those cases considered critical (formal requirements don't seem to cover payment in full). [Sustainable Supply Chain Report 2022, 06/2023: edp.com] • Not Met: Analysis of trends demonstrating progress: The Company has provided comments regarding this indicator, however, core evidence was already in use for indicators above.
H.4.PD	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts • Not Met: Describes working with suppliers on free movement of workers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain • Not Met: Capacity building to enable suppliers to cascade forced labour policies down supply chain
H.5.PD	Freedom of association and collective bargaining	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Company states in its Supplier Code of Conduct that it 'respects freedom of association and the collective bargaining of their workers, establishing mechanisms of dialogue free from any reprisals or discrimination.' The Company's human rights policy and code of ethics contains commitments regarding freedom of association and collective bargaining. Finally, the Code of ethics states that 'we must not Determine nor constrain any type of decision based on discriminatory factors, namely [...] political or ideological beliefs, trade union membership, or on the basis of job, activity or professional category'. [Human Rights Policy, 07/2021: edp.com] & [Supplier Code of Conduct, 12/05/2017: edp.com] • Not Met: Describes work with suppliers on FoA/CB: The Company has provided comments that 'Through the Due Diligence system implemented by EDP, suppliers are qualified, and, during the contractual relationship, they are monitored through inspections, reports, audits, and performance assessment. Depending on the verified performance, EDP proposes to suppliers the development of competences, for example the obtaining of certifications, and improvement programs, whenever the performance results are below expectations. This process is monitored by the contract manager who uses the sustainability team to support suppliers. The holding of workshops with suppliers is a current activity, as well as the sharing of training instruments and the invitation to participate in associations that promote sustainability.' However, no evidence found on the details how the Company works to support the practices of its suppliers specifically in relation to freedom of association and collective bargaining. [Sustainable Supply Chain Report 2022, 06/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement. • Not Met: Analysis of trends demonstrating progress: The Company has provided comments regarding this indicator, however, no evidence found in relation to this requirement.
H.6.PD	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The Company mentions 'respecting the minimum wages established in each country' in its Supplier Code of Conduct. However, paying over a minimum wage does not imply paying a living wage. [Supplier Code of Conduct, 12/05/2017: edp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes work with suppliers on living wage, beyond tier 1 suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to regularly review definition of living wages with relevant trade unions

I. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Environmental impact assessment and remediation	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Conducts public EIA and CIA for renewable energy projects: The Company states that 'environmental impact studies have been carried out for EDP Spain network installation projects which, due to their delineation throughout the protected areas, are subject to an environmental assessment by the competent body.' In future assessments, the Company will also be expected to explain or demonstrate under what circumstances it undertakes Cumulative Impact Assessments for its renewable energy projects in order to meet this criteria. [Integrated Annual Report 2022, 31/12/2023: edp.com] • Not Met: Assessments comply with Espoo Convention and/or the EU Environmental Impact Assessment Directive and fulfil certain standards <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Reports on compliance with government-mandated remediation fund requirements • Not Met: Reports on how an entity guarantees payment for environmental restoration or compensation
I.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Expectation for suppliers to conduct regular public life cycle assessments (including risks related to raw material sourcing, waste, and decommissioning): The Company states in its supplier management section of its Integrated Report 2022 that it has action plan 2023 for suppliers to 'promote Environmental Product Declaration (EPD) after life cycle assessment (LCA) following applicable product category rules (PCRs) and ISO 14025 standard.' However, no evidence found the Company has a requirement for its suppliers to conduct regular public LCA of its primary technologies as per ISO 14040. [Integrated Annual Report 2022, 31/12/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to have action plans to address adverse impacts identified

J. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Anti-corruption due diligence and reporting	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to prohibiting bribes to public officials: The Company states in its Code of Ethics that 'EDP prohibits the practice of corruption and bribery, actively or passively, through acts or omissions, including the creation and maintenance of situations of favouritism through facilitation payments or other irregularities.' The Company also states in its Integrity Policy that 'the EDP Group adhered to the 10 principles of the United Nations Global Compact, which includes the Anti-Corruption principle and within which companies must work to fight corruption in all its forms' and 'any practice or conduct that may configure, assist or appear any of the situations below are, in particular, strictly forbidden, a) corruption, b) bribery, including facilitation payment.' The Company has comments that there are various types of corruption, but the following are the most relevant for the purposes of integrity policy. - Passive corruption (of a public official or holder of political office): The request, receipt or acceptance of the promise, directly or indirectly, of any undue advantages, for their own benefit or that of third parties, for the practice or abstention from the practice of an act in the exercise of their functions, contrary or not to the duties of the position, even if prior to that request, receipt or acceptance of the promise; - Active corruption (of a public official or holder of political office): The promise to deliver or delivery, directly or indirectly, of undue advantages, for their own benefit or that of third parties, so that an official or holder of political office practices or refrains from performing an act in the exercise of their functions, contrary or not to the duties of office, even if prior to that promise or delivery. [Code of Ethics, 10/2022: edp.com] & [EDP Group Integrity Policy, 23/05/2023: edp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Expectation extends to relevant business relationships: The Company states in its Supplier Code of Conduct that its compliance commitments include 'not to pursue, permit, consent to or collude with any activity, practice, or conduct likely to constitute or appear to be an act of bribery and/or corruption, criminally punishable under applicable law. Also, to institute procedures and implement necessary and appropriate measures aimed at preventing their occurrence.' The Code applies to 'applies to entities that supply or intend to supply goods and services to any of the EDP Group companies'. However, there is not an explicit commitment prohibiting bribes to foreign public officials according to international standards. [Supplier Code of Conduct, 12/05/2017: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Reports on any complaints on corruption and bribery: The Company reports that 'one incident relating to corruption and bribery remained open in 2021, and 20 new cases were registered in 2022. Among the total incidents recorded, the analysis of 14 cases had been completed, by the end of 2022, of which two were found justified. These two cases triggered disciplinary actions against the contractors involved and an awareness-raising action was promoted among the respective teams'. [Integrated Annual Report 2022, 31/12/2023: edp.com] • Not Met: Reports that no such complaints were made
J.2.PD	Payments to governments & contract transparency	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Publishing a tax CbCR in line with GRI 207-4, or discloses payments made to governments at project-level including for purchase or rent of land or natural resources related to its renewable energy projects: No information has been identified in the company's public policies and reports. In future assessments, the Company will be expected to demonstrate it publishes a tax CbCR and a report on its payments to governments at project level, including for purchase or rent of land or natural resources related to its renewable energy projects • Not Met: Disclosure of terms, contracts, agreements for those payments <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI

K. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The Company has provided comments that total 5,714 hours of training for Ethics were conducted in EDP Group. However, no further details found on the training to its staff on all types of contracts on equality, equity, diversity, and anti-discrimination. [Human and Labour Rights Report 2022, 07/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to do the same • Not Met: Provides materials and access to resources for trainings
K.2.PD	Gender balance and sensitivity	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain: The Company states that includes requirements on non-discrimination in its Human Rights Policy, Supplier Code of Conduct, Code of Ethics, and Human and Labour Reports. The Company also has Gender Equality Plan, which is part of a broader set of initiatives developed by EDP, both globally and locally in all geographies where it operates, matching the commitments and principles it has already taken up in terms of diversity, namely by: Promoting mutual respect and ensuring equal opportunities in the face of diversity for all people at the company; Acknowledging and appreciating diversity of identity, of life experiences or of cognitive and neurological functioning, as a source for strengthening human potential, creativity, and innovation in management and business strategy; Adopting positive actions and awareness-raising measures internally and within the community, with a view to the actual implementation and effectiveness of the DEIB Policy. However, this subindicator looks for evidence of a time-bound action plan to integrate gender lens not only to policies but to practices including human rights due diligence process, risk management and remedy including supply chain. [Plan for Gender Equality, 2023: edp.com] • Not Met: Demonstrates progress through annual reporting: The Company has provided comments that it has reported percentage of female employees from 2019 to 2022. Such as in 2022, the rate of female employees was 27.5%. However,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>this subindicator looks for evidence of progress in adopting an action plan to integrate gender lens to both policies and practices in human rights including due diligence processes and risk management [Integrated Annual Report 2022, 31/12/2023: edp.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Women and non-binary people make up at least 40% of the Company's board of directors and executives, or executive board: The Company has reported that there are five members of Executive Board of Directors. Two out of them are female, which accounts for 40%. [Integrated Annual Report 2022, 31/12/2023: edp.com]
K.3.PD	Gender wage gap reporting	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap • Not Met: Timebound commitment to close gender wage gap • Met: Reports information at company level across multiple pay bands: The Company states that it has launched DEIB (Diversity, Equity, Inclusion, and Belonging) Global Policy, as well as an updated Gender Equality Plan (2022/2023) and an Equal Pay Project within global compensation framework. The Company also reports that pay ratio by gender is 1.05 (F/M) at group level, 1.10 in Portugal, 0.88 in Spain, 1.08 in South American, 0.96 in North America, 0.78 in rest of the Europe, and 1.27 in APAC. [Integrated Annual Report 2022, 31/12/2023: edp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects business relationships to do the same

JT. Just transition[†]

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.1	Fundamentals of social dialogue and stakeholder engagement in a just transition	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations • Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified. • Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition. • Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.
JT.2	Fundamentals of just transition planning	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning. • Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers. • Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders • Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.
JT.3.PD	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition. • Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders. • Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders. • Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups
JT.4.PD	Fundamentals of retaining and re-and/or up-skilling workers for an inclusive and balanced workforce	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy. • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders. • Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.

[†] Assessment for this sub section has been conducted by the World Benchmarking Alliance, see: <https://www.worldbenchmarkingalliance.org/climate-and-energy-benchmark/>

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.5.PD	Fundamentals of social protection and social impact management for a just transition	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders. • Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection. • Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection. • Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.
JT.6.PD	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition. • Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition. • Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition. • Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection

M. Responses to Serious Allegations (20% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<p>According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism".</p> <p>EDP is a project developer active in the solar sector and therefore faces a risk of potential exposure to Uyghur forced labour through its solar panel supply chain. [United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": documents-dds-ny.un.org] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN experts": ohchr.org] [Sheffield Hallam University, May 2021, "In Broad Daylight - Uyghur Forced Labour and Global Solar Supply Chains": shu.ac.uk] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar value chain vulnerable to alleged forced labour in Uyghur Region, says major study": business-humanrights.org]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets	0	<ul style="list-style-type: none"> Not Met: The Company states that 'In the international organizations in which EDP participates, EDP defends the creation of an international traceability system. [...] To act against forced labor, EDP dialogues with its direct suppliers (end-user manufacturers) to establish specific contractual procedures and disclosures, which must be extended to second tier suppliers. EDP already applies traceability contractual rules, including audits, and identifies indirect suppliers, specially the local origin of silicon. [...] In addition, during this phase and during the execution of contracts, the traceability of the supply chain is a key issue to monitor and avoid potential human rights risks. The Company establishes as one of the main requirements of the agreements to know the supplier's supply chain management and to have a traceability map of the processes that take place upstream in its value chain. The localization and ownership of the upstream manufacture sites is the key factor in assuring the value chain traceability.' However, this does not indicate independently verified disclosure of the Company's full solar supply chain. [Human and Labour Rights Report 2022. 07/2023: edp.com] [EDP's response]
M(0).2	<p>If mapping identifies suppliers linked to regions where there is a high risk of forced labour including those identified by UN bodies, the company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships). The company indicates that this information is relevant to all destination markets.</p> <p>•Note: Any disengagement needs to be verified and decision-making to continue engagement with “crucial business relationships” in high-risk area needs to be explained, in line with OHCHR Guidance on Business & Human Rights in Challenging Contexts: “Where a business enterprise has determined that a relationship is indeed “crucial” within the meaning of Guiding Principle 19, and that it will be continuing with the relationship on that basis, it should be transparent with stakeholders and the public at large about the decision-making process used to arrive at that determination and the criteria used, which should be objectively reasonable.”</p>	0	<ul style="list-style-type: none"> Not Met: The Company states that it doesn't source from Xinjiang. However, it is not clear whether this statement extends to the full supply chain with independent verification. In addition, no information was found that meet the criteria on explaining how steps taken align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships) at the time this research is conducted. [EDP's response]

Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates⁴ are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of September 2023⁵.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible

⁴ Cut-off dates: 30 June 2023 for companies that did not engage with the benchmark; the expiration of the feedback period (between Aug/Sep 2023) for companies that engaged with the benchmark.

⁵ Further outreach and engagement with a subset of companies on the specific issue of exposure to forced labour risks was conducted in October 2023.

business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for electric utilities and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. **Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores** as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

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